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7 Attorneys for the People of the State of California

*Exempt from fees pursuant to  
Government Code § 6103*

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10 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
11 COUNTY OF SANTA BARBARA  
12 ANACAPA DIVISION

13 THE PEOPLE OF THE STATE OF  
14 CALIFORNIA ex rel. Ariel Pierre  
15 CALONNE, City Attorney and City  
Prosecutor of the City of Santa Barbara,

16 Plaintiff,

17 vs.

18 DARIO L. PINI; D.L.P. PROPERTIES;  
19 DARIO L. PINI, TRUSTEE OF THE  
20 DARIO L. PINI TRUST DATED MARCH  
2, 2015; NONNIE INVESTMENT, LLC;  
104 LAS AQUAJES, LLC; ALAMAR II,  
21 LLC; ALAMAR III, LLC; and DOES 1  
through 100,

22 Defendants.  
23

) CASE NO. 17CV00718

)  
) COMPLAINT FOR INJUNCTIVE RELIEF  
) AND CIVIL PENALTIES

) (California Unfair Competition Law, Bus. &  
) Prof. Code, §§ 17200 et seq.)

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1 Ariel Pierre Calonne, City Attorney and City Prosecutor of the City of Santa Barbara  
2 (hereinafter "Calonne"), on behalf of THE PEOPLE OF THE STATE OF CALIFORNIA  
3 (hereinafter referred to as "the PEOPLE"), alleges as follows:

4 INTRODUCTION

5 1. Defendant Dario Pini and his related business entities own real property consisting  
6 of hundreds of apartments, single family homes and residential hotels or motels in the City of  
7 Santa Barbara. Since the early 1980's, Pini has been actually and legally responsible for  
8 thousands of unlawful acts and neglect which have collectively damaged the health and safety  
9 of the residents of his properties and the surrounding Santa Barbara neighborhoods. Pini has a  
10 business practice of seeking out and taking economic advantage of tenants who may be unable  
11 to demand their legal rights to safe and habitable housing because of their poverty, immigration  
12 status, age, or disabilities. He routinely threatens retaliation and actually retaliates against  
13 tenants who do have the courage to complain, thereby suppressing evidence of his unlawful  
14 actions and neglect. Pini himself lives in Santa Barbara's Riviera neighborhood where he keeps  
15 his own home as, literally, a rat's nest of illegal construction, illegal storage, vermin infestation  
16 and dangerous conditions.

17 2. Pini routinely disregards judicial process, including a property maintenance and  
18 nuisance abatement remedial system delegated to a Referee appointed by this Court as a Special  
19 Master pursuant to previous litigation against Pini by the City of Santa Barbara. The City of  
20 Santa Barbara has expended hundreds of thousands of taxpayer dollars to enforce a wide array  
21 of building and safety codes against Pini. Nonetheless, his pattern and practice of unlawful  
22 action and unlawful neglect persists to this day, totally unresponsive to traditional code  
23 enforcement practices.

24 3. The children, senior citizens, disabled persons and adults of Santa Barbara who  
25 live in Pini's properties are exposed to hazardous, horrific and unconscionable living  
26 conditions, including but not limited to, rodent infestations, insect infestations, severe mold,  
27 unpermitted and hazardous electrical wiring, inoperable heating, unsanitary bathrooms, missing  
28 windows, plumbing leaks, structures so poorly maintained that they are at risk of collapse,

1 damaged floor supports, missing or inoperable smoke alarms, junk and debris creating fire  
2 hazards, unsafe stairways, inadequate ventilation, unpermitted and improperly installed water  
3 heaters, and overcrowding.

4 4. The residents of the Santa Barbara neighborhoods surrounding Pini's properties  
5 likewise suffer from the hazards and blight created by Pini's unlawful actions and neglect.

6 5. The many Santa Barbara property owners and landlords who strive to comply with  
7 the laws and regulations governing the health, safety and maintenance of their properties are  
8 competitively disadvantaged, and suffer economic harm, as a result of Pini's tactics.

9 6. The PEOPLE bring this action under California's Unfair Competition Law so that  
10 the Court can protect the residents and economy of Santa Barbara, once and for all, by  
11 enjoining Pini's unlawful practices. The PEOPLE also demand civil penalties of \$2,500 per  
12 violation, the maximum amount authorized under the Unfair Competition Law, based upon the  
13 3,245 code violations identified during warrant-based inspections of just 13 of Pini's properties  
14 during December 2016. The PEOPLE will amend this demand according to proof to seek  
15 \$5,000 per violation perpetrated against senior citizens or disabled persons. A civil penalty in  
16 excess of \$8.1 million is therefore warranted based upon the circumstances the Court must, by  
17 statute, consider when assessing the amount of the penalty. These circumstances include, but  
18 are not limited to, the:

- 19 A. Nature and seriousness of Pini's misconduct;  
20 B. number of violations;  
21 C. persistence of Pini's misconduct;  
22 D. length of time over which Pini's misconduct occurred;  
23 E. willfulness of Pini's misconduct; and,  
24 F. assets, liabilities, and net worth of Pini. (Bus. & Prof. Code, § 17206(b).)

25 These civil penalties are to be dedicated and used for the enforcement of consumer protection  
26 laws, and will be so dedicated and used for the benefit of the residents of Santa Barbara and  
27 Santa Barbara County, as applicable.

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2 PARTIES AND CHARGING AUTHORITY

3 7. At all times relevant to this Complaint, the City of Santa Barbara was and is a  
4 municipal corporation and a chartered city organized and existing under the Article XI, section 5  
5 of the California Constitution and laws of the state of California.

6 8. Calonne is the City Attorney of the City of Santa Barbara.

7 9. As City Attorney of the City of Santa Barbara, Calonne is designated by City  
8 Charter section 703 and Government Code section 72193, and exercises the powers and duties  
9 of, the full-time City Prosecutor of the City of Santa Barbara.

10 10. Joyce Dudley is the duly elected District Attorney of the County of Santa Barbara  
11 and has granted her consent to this action.

12 11. California's Unfair Practices Law, Business & Professions Code sections 17200, et  
13 seq., provides that unfair competition includes "any unlawful, unfair or fraudulent business act  
14 or practice." (Bus. & Prof. Code, § 17200; hereinafter referred to as "the UCL.") An unlawful  
15 business activity includes "anything that can properly be called a business practice and that at  
16 the same time is forbidden by law." (*People v. McKale* (1979) 25 Cal.3d 626, 632; *Olszewski v.*  
17 *Scripps Health* (2003) 30 Cal.4th 798, 827.) California courts have consistently interpreted such  
18 language broadly, and recognized that it is intended to protect consumers as well as competitors.

19 12. A long-term and ongoing pattern of failure and refusal to comply with building  
20 and housing codes constitutes an unlawful business practice.

21 13. The UCL provides that "any person who engages, has engaged, or proposed to  
22 engage in unfair competition may be enjoined" and that the court may make any order necessary  
23 to prevent unfair competition, including the appointment of a receiver. (Bus. & Prof. Code, §  
24 17203.)

25 14. Person includes "natural persons, corporations, firms, partnerships, joint stock  
26 companies, associations and other organizations of persons. (Bus. & Prof. Code, § 17201.)

27 Defendants are thus included in the definition of "person" under the UCL.

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15. Business and Professions Code section 17204 authorizes a full-time city prosecutor, in the name of the people of the state of California upon his or her own complaint, and acting with the consent of the District Attorney, to bring an action for injunctive relief.

16. Business and Professions Code section 17206 authorizes a full-time city prosecutor, in the name of the people of the state of California upon his or her own complaint, and acting with the consent of the District Attorney, to bring an action for a civil penalty not to exceed two thousand five hundred dollars (\$2,500) for each violation constituting unfair competition.

17. The remedies provided by the UCL are cumulative to the remedies and any penalties available under all other laws of the State of California. (Bus. & Prof. Code, § 17205.)

18. Defendants DARIO PINI, D.L.P. PROPERTIES; DARIO L. PINI, TRUSTEE OF THE DARIO L. PINI TRUST DATED MARCH 2, 2015; NONNIE INVESTMENT, LLC; 104 LAS AQUAJES, LLC; ALAMAR II, LLC; and ALAMAR III, LLC (“PINI”), and/or DOES 1 through 100, own real property in the City of Santa Barbara and are engaged in the business of property ownership and development, leasing and renting, and managing real property.

19. The true names and capacities of Defendants DOES 1 through 100 are unknown to the PEOPLE, and for that reason they are sued under fictitious names. The PEOPLE will amend this Complaint to allege the DOE defendants’ true names and capacities when they have been ascertained. The PEOPLE allege that each of the DOE defendants is responsible in some manner for the unlawful, dangerous, and substandard conditions on the Subject Properties set forth in this Complaint, and/or held a legal or equitable interest in one or more of the Subject Properties.

FACTUAL ALLEGATIONS

20. At all times relevant to this Complaint, PINI and/or DOES 1 through 100 held legal title to the following properties (among others) located in the City of Santa Barbara:

- A. 26 Chapala Street, Santa Barbara, California, 93101, Assessor’s Parcel Number (hereinafter “APN”) 033-102-001;

- 1 B. 102 West Cabrillo Boulevard, Santa Barbara, California, 93101, APN 033-  
2 101-007;
- 3 C. 104 Los Aguajes Avenue, Santa Barbara, California, 93101, APN 033-041-  
4 002;
- 5 D. 313 West Arrellaga Street, Santa Barbara, California, 93101, APN 027-212-  
6 005;
- 7 E. 318 West Valerio Street, Santa Barbara, California, 93101, APN 027-082-  
8 019;
- 9 F. 320 West Valerio Street, Santa Barbara, California, 93101, APN 027-082-  
10 019;
- 11 G. 320 West Mission Street, Santa Barbara, California, 93101, APN 025-292-  
12 020;
- 13 H. 329 East Carrillo Street, Santa Barbara, California, 93101, APN 029-221-  
14 015;
- 15 I. 615 San Pascual Street, Santa Barbara, California, 93101, APN 037-101-012;
- 16 J. 626-630 West Cota Street, Santa Barbara, California, 93101, APN. 037-101-  
17 020;
- 18 K. 1816 State Street, Santa Barbara, California, 93101, APN 027-032-021; and,
- 19 L. 1335 Mission Ridge Road, Santa Barbara, California, 93103, APN 019-210-  
20 005 (hereinafter, collectively, the "Subject Properties").

21 21. At all times relevant to this Complaint, PINI has operated and/or had a legal  
22 interest in businesses on the Subject Properties.

23 22. PINI and/or DOES 1 through 100 have maintained and operated the businesses on  
24 the Subject Properties in a manner which violates the California Health and Safety Code  
25 ("HSC"), the California Building Standards Code ("CBSC"), the California Fire Code ("CFC"),  
26 the California Building Code ("CBC"), the California Residential Code ("CRC"), the California  
27 Electrical Code ("CEC"), the California Plumbing Code ("CPC"), the International Property  
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1 Maintenance Code (“IPMC”), the Santa Barbara Municipal Code (“SBMC”) and other  
2 applicable laws for which City enforcement is authorized.

3 23. At all times relevant to this Complaint, PINI and/or DOES 1 through 100 have  
4 maintained and operated the businesses on the Subject Properties in a manner which includes,  
5 but is not limited to, the list of 184 examples of violations set forth in this paragraph:

6 A. **26 Chapala Street**, Santa Barbara, California, 93101, Assessor’s Parcel  
7 Number (hereinafter “APN”) 033-102-001.

- 8 i. Extensive unpermitted construction. (CBC, § 105.1.)
- 9 ii. Unsanitary and dilapidated vacant structure. (CBC, § 301.3.)
- 10 iii. Deteriorated sidewalks and driveways. (IPMC, § 302.3.)
- 11 iv. Illegal storage on exterior premises. (HSC, §§ 17920.3(a), (h), (j); CBC, §  
12 116.1; CRC, § 311.1; CFC, §§ 1030.1, 1030.2, 1030.3; SBMC, §  
13 28.87.190.)
- 14 v. Inadequate means of egress. (HSC, § 17920.3(l).)
- 15 vi. Deteriorated exterior surfaces. (HSC, § 17920.3(g)(2); CBC, § 116.1;  
16 IPMC, § 304.2.)
- 17 vii. Unsecured building. (CBC, § 116.1.)
- 18 viii. Deteriorated or inadequate flooring. (HSC, § 17920.3(b)(2).)
- 19 ix. Deteriorated, loss, or crumbling plaster. (HSC, § 17920.3(g)(3).)
- 20 x. Excessive storage. (HSC, § 17920.3(a), (h), (j); CBC, § 116.1; CRC, §  
21 311.1; CFC, §§ 1030.1, 1030.2, 1030.3.)

22 B. **102 West Cabrillo Boulevard**, Santa Barbara, California, 93101, APN 033-  
23 101-007;

- 24 i. Extensive unpermitted construction. (CBC, § 105.1.)
- 25 ii. Extensive structural damage to exterior walls. (HSC, § 17920.3(a)(14);  
26 CBC, § 116.1; IPMC, § 304.1.)
- 27 iii. Dilapidated second story deck. (HSC, § 17920.3(c); CBC, § 116.1;  
28 IPMC, § 304.10.)

- 1           iv.     Structure at risk of collapse. (HCS, § 17920.3(b)(1), (b)(6); CBC, §
- 2                     116.1; CFC, §§ 110.1.1, 701.2.)
- 3           v.     Unpermitted relocation of laundry room. (CBC, § 105.1.)
- 4           vi.    General dilapidation and lack of maintenance. (HSC, § 17920.3(a)(14);
- 5                     CBC, § 116.1.)
- 6           vii.   Handrails and guards are improperly fastened. (IPMC, § 304.12.)
- 7           viii.   Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1; CPC, § 405.1.)
- 8           ix.    Insufficient bedroom area. (IPMC, § 404.4.1.)
- 9           x.     Improper maintenance of interior walls and cabinetry. (HSC, §
- 10                    17920.3(a)(14); IPMC, §305.1.)
- 11           xi.    Hazardous electrical wiring. (HSC, § 17920.3(d); CFC, § 605.1; CEC, §
- 12                    300.4; CBC, § 116.1.)
- 13           xii.   Unpermitted electrical installations. (CBC, § 105.1.)
- 14           xiii.   Damaged bathroom facilities. (HSC, § 17920.3(a)(2), (c); CBC, § 116.1.)
- 15           xiv.   Unsanitary conditions in bathroom. (HSC, § 17920.3(b); CBC, § 116.1;
- 16                    CPC § 309.2.)
- 17           xv.    Dilapidated and deteriorating deck. (HSC, § 17920.3(c); CBC, § 116.1;
- 18                    IPMC, § 304.10.)
- 19           xvi.   Lack of adequate heating. (HSC, § 17920.3(a)(6).)
- 20           xvii.   Missing window screens. (HSC, § 17920.3(g)(2); CBC, § 116.1; IPMC, §
- 21                    304.14.)

22           C. 104 Los Aguajes Avenue, Santa Barbara, California, 93101, APN 033-041-

23           002;

- 24           i.     General dilapidation and improper maintenance. (HSC, § 17920.3(a)(14);
- 25                     CBC, § 116.1.)
- 26           ii.    Holes and structural damage to exterior walls. (HSC, § 17920.3(a)(14);
- 27                     CBC, § 116.1; IPMC, § 304.1.)

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- 1                   iii.     Partially destroyed building. (HSC, § 17920.3(a)(14); CBC, § 116.1;
- 2                                 SBMC, § 22.08.025)
- 3                   iv.     Structure at risk of collapse. (HSC, § 17920.3(b)(1), (b)(6); CBC, §
- 4                                 116.1; CFC, §§ 110.1.1, 701.2.)
- 5                   v.     Unpermitted deck. (CBC, § 105.1)
- 6                   vi.     Dilapidated and deteriorating deck. (HSC, § 17920.3(c); CBC, § 116.1;
- 7                                 IPMC, § 304.10.)
- 8                   vii.    Dilapidated exterior stairway. (HSC, §17920.3(b), (c), (k); CBC, §§
- 9                                 116.1, 1009.)
- 10                  viii.   Accumulation of rubbish, foliage, grass. (HSC, § 17920.3(c), (j); CBC, §
- 11                                 116.1; SBMC, §§ 28.87.190, 8.08.110.)
- 12                  ix.     Hazardous electrical wiring. (HSC, § 17920.3(c), (d); CFC, § 605.1;
- 13                                 CEC, § 300.4; CBC, § 116.1.)
- 14                  x.     Damaged floor supports. (HSC, § 17920.3(b)(2); CBC, § 116.1.)
- 15                  xi.     Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1; CPC, § 405.1.)
- 16                  xii.    Holes in interior walls and cabinetry. (HSC, § 17920.3(a)(14); IPMC,
- 17                                 §305.1.)
- 18                  xiii.   Missing or inoperable smoke alarm. (CFC, § 1103.7.6; CBC, §§ 420.5,
- 19                                 907.2.9.)
- 20                  xiv.    Unsecured building. (CBC, § 116.1.)
- 21                  xv.    Junk and debris creating fire hazard. (HSC, § 17920.3(g); CBC, § 116.1.)
- 22                  xvi.    Faulty Weather Protection. (HSC, § 17920.3(g); CBC, § 116.1.)
- 23                  xvii.   Unsanitary conditions in bathroom. (HSC, § 17920.3(b); CBC, § 116.1;
- 24                                 CPC § 309.2.)
- 25                  xviii.   Damaged bathtub. (HSC, § 17920.3(a)(1); CBC, § 116.1.)
- 26                  xix.    Damaged windows. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 27                  xx.    Damaged kitchen facility. (HSC, § 17920.3(a)(13); CBC, § 116.1.)
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- D. 313 West Arrellaga Street, Santa Barbara, California, 93101, APN 027-212-005;
- i. Extensive unpermitted construction. (CBC, § 105.1.)
  - ii. Excessive storage. (HSC, §§ 17920.3(a), (h), (j); CBC, § 116.1; CRC, § 311.1; CFC, §§ 1030.1, 1030.2, 1030.3.)
  - iii. Improperly maintenance interior walls. (HSC, § 17920.3(a)(14); IPMC, §305.1.)
  - iv. Damaged doorways. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
  - v. Handrails and guards are improperly fastened. (IPMC, § 304.12.)
  - vi. General dilapidation and improper maintenance. (HSC, § 17920.3(a)(14); CBC, 116.1.)
  - vii. Inadequate ventilation. (HSC, § 17920.3(a); CBC, § 116.1.)
  - viii. Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1; CPC, § 405.1.)
  - ix. Inaccessible or unavailable occupant parking. (SBMC, §§ 28.90.100, 28.90.060.)

- E. 318 West Valerio Street, Santa Barbara, California, 93101, APN 027-082-019;
- i. Partially destroyed building. (HSC, § 17920.3(a)(14); CBC, 116.1; SBMC, § 22.08.025.)
  - ii. Holes in walls. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
  - iii. Deteriorated exterior stairway. (HSC, §17920.3(b), (c), (k); CBC, §§ 116.1, 1009.)
  - iv. Unpermitted installation of water heaters. (CBC, §§ 502.0, 501.1)
  - v. Accumulation of rubbish, foliage, grass. (HSC, § 17920.3(c), (j); CBC, § 116.1; SBMC, §§ 28.87.190, 8.08.110.)
  - vi. General dilapidation and lack of maintenance. (HSC, § 17920.3(a)(14); CBC, 116.1.)

- 1           vii.    Unpermitted replacement and installation of plumbing. (CPC, § 103.1;
- 2                            CBC, § 105.1.)
- 3           viii.   Inadequate ventilation. (HSC, § 17920.3(a); CBC, § 116.1.)
- 4           ix.     Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1; CPC, § 405.1.)
- 5           x.     Damaged windows. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 6           xi.    Missing window screens. (HSC, § 17920.3(g)(2); CBC, § 116.1; IPMC, §
- 7                            304.14.)
- 8           xii.   Structural damage to interior walls due to water damage. (HSC, §§
- 9                            17920.3(a)(11), (b)(4), (b)(5); CBC, § 116.1.)
- 10          xiii.   Damaged walls. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 11          xiv.    Unsanitary conditions in bathroom. (HSC, § 17920.3(b); CBC, § 116.1;
- 12                            CPC § 309.2.)
- 13          xv.    Inadequate exists. (HSC, § 17920.3(l); CFC, § 1030.3.)
- 14          xvi.   Insufficient bedroom area. (IPMC, § 404.4.1.)
- 15          xvii.   Unpermitted installation of heaters. (CBC, § 105.1.)
- 16          xviii.   Substandard and dilapidated electrical outlets. (HSC, § 17920.3(d); CBC,
- 17                            § 116.1; CEC, §§ 404.6, 404.9.)
- 18          xix.   Lack of adequate heat. (HSC, § 17920.3(e).)
- 19          xx.    Damaged kitchen facility. (HSC, § 17920.3(a)(13); CBC, § 116.1.)
- 20          xxi.   Broken light fixtures. (HSC, § 17920.3(a), (c); CBC, § 116.1.)
- 21          xxii.   Unsecured toilet. (HSC, § 17920.3(a)(2), (c); CBC, § 116.1.)
- 22          xxiii.   Damaged doorways. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 23            **F. 320 West Valerio Street, Santa Barbara, California, 93101, APN 027-082-**
- 24            019;
- 25            i.     Insufficient and substandard bedroom area. (IPMC, § 404.4.1.)
- 26            ii.    Missing window screens. (HSC, § 17920.3(g)(2); CBC, § 116.1; IPMC, §
- 27                            304.14.)
- 28            iii.   Substandard dilapidated interior walls. (IPMC, § 305.3.)

- 1 iv. Substandard dilapidated roof. (IPMC, § 304.7.)  
2 v. Structurally damaged ceiling. (HSC, § 17920.3(a)(14), (b)(6), (b)(7),  
3 (g)(4); CBC, § 116.1.)  
4 vi. Damp uninhabitable rooms. (HSC, § 17920.3(a)(11).)  
5 vii. Severe mold. ((HSC, § 17920.3(a)(11), (j); CBC, § 116.1.)  
6 viii. Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1; CPC, § 405.1.)  
7 ix. Substandard and dilapidated kitchen facility. (HSC, § 17920.3(a)(13);  
8 CBC, § 116.1.)  
9 x. Damaged and dilapidated bathroom facilities. (HSC, § 17920.3(a)(2), (c);  
10 CBC, § 116.1.)  
11 xi. Plumbing leaks. (HSC, § 17920.3(e); CBC, § 116.1.)  
12 xii. Missing smoke detectors. (CFC, § 1103.7.5.1; CBC, §§ 420.5, 907.2.8.)  
13 xiii. Unsecured Building. (CBC, § 116.1.)  
14 xiv. Unpermitted construction. (HSC, § 1790.3(c); CBC, § 105.1.)  
15 xv. Unpermitted installation of water heaters. (CBC, §§ 502.0, 501.1)  
16 xvi. Damaged doorway. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)  
17 xvii. Hazardous and exposed electrical wiring. (HSC, § 17920.3(c), (d); CFC,  
18 § 605.1; CEC, § 300.4; CBC, § 116.1.)  
19 xviii. Lack of adequate heating. (HSC, § 17920.3(a)(6).)  
20 xix. Unsanitary bathroom. (HSC, §§ 17920.3(a)(13).)  
21 xx. Broken or missing windows. (HSC, § 17920.3(g)(2); CBC, § 116.1;  
22 IPMC, §§ 304.14, 305.3.)  
23 G. 320 West Mission Street, Santa Barbara, California, 93101, APN 025-292-  
24 020;  
25 i. Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1.)  
26 ii. Deteriorated exterior surfaces. (HSC, § 17920.3(g)(2); CBC, § 116.1;  
27 IPMC, § 304.2.)  
28 iii. Deteriorated exterior stairways. (IPMC, § 304.10.)

- 1 iv. Deteriorated sidewalks and driveways. (IPMC, § 302.3.)
- 2 v. Deteriorated glazing. (IPMC, § 304.13.1.)
- 3 vi. Missing window screens. (IPMC, § 304.14.)
- 4 vii. Graffiti. (SBMC, § 9.66.050.)
- 5 viiii. Unpermitted construction. (CBC, § 105.1.)
- 6 ix. Holes in walls. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 7 x. Hazardous electrical wiring. (HSC, § 17920.3(d).)
- 8 xi. Damaged windows. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 9 xii. Lack of adequate heating. (HSC, § 17920.3(a)(6).)
- 10 xiii. Damaged kitchen facility. (HSC, § 17920.3(a)(13); CBC, § 116.1.)
- 11 xiv. Damaged bathroom facilities. (HSC, § 17920.3(a)(2), (c); CBC, § 116.1.)
- 12 xv. Unpermitted water heater installation. (CBC, §§ 502.0, 501.1.)
- 13 xvi. Damaged doorway. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 14 xvii. Plumbing leaks. (HSC, § 17920.3(e); CBC, § 116.1.)
- 15 xviii. Severe mold. ((HSC, § 17920.3(a)(11), (j); CBC, § 116.1.)
- 16 xix. Missing smoke detector. (CFC, § 1103.7.5.1; CBC, §§ 420.5, 907.2.8.)
- 17 H. **329 East Carrillo Street**, Santa Barbara, California, 93101, APN 029-221-
- 18 015;
- 19 i. Extensive unpermitted construction. (CBC, § 105.1)
- 20 ii. Inaccessible or unavailable occupant parking. (SBMC, §§ 28.90.100,
- 21 28.90.060.)
- 22 iii. Inoperable vehicles on lot. (SBMC, § 28.90.001)
- 23 iv. Excessive storage. (HSC, §§ 17920.3(a), (h), (j); CBC, § 116.1; CRC, §
- 24 311.1; CFC, §§ 1030.1, 1030.2, 1030.3.)
- 25 v. Dilapidated exterior stairway. (HSC, §17920.3(b), (c), (k); CBC, §§
- 26 116.1, 1009.)
- 27 vi. Lack of adequate heating. (HSC, § 17920.3(a)(6).)
- 28 vii. Substandard and inadequate bedroom. (HSC, § 17920.3(a)(9).)

- 1           viii.    Damaged doorway. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 2           ix.     Lack of adequate heating. (HSC, § 17920.3(a)(6).)
- 3           x.     Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1.)
- 4           xi.     Damaged windows. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 5        **I. 615 San Pascual Street, Santa Barbara, California, 93101, APN 037-101-012;**
- 6           i.     Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1.)
- 7           ii.    Missing window screens. (HSC, § 17920.3(g)(2); CBC, § 116.1; IPMC, §
- 8                    304.14.)
- 9           iii.   Holes in exterior walls. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, §
- 10                   305.3.)
- 11          iv.    Damaged and inadequate stairway and handrail construction. (HSC, §
- 12                   17920.3(c); CBC, § 1403.4.)
- 13          v.     Damaged and deteriorated exterior columns. (HSC, § 17920.3(a)(13).)
- 14          vi.    Damaged walls. (HSC, § 17920.3(b); CBC, § 116.1.)
- 15          vii.   Extensive unpermitted construction. (CBC, § 105.1.)
- 16          viii.   Bedroom size insufficient. (HSC, § 17920.3(a)(9).)
- 17          ix.    Damaged doorway. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 18        **J. 626–630 West Cota Street, Santa Barbara, California, 93101, APN. 037-101-**
- 19        020;
- 20           i.     Rodent harborage. (HSC, § 17920.3(a); IPMC, § 302.5.)
- 21           ii.    Holes and other structural damage in exterior walls. (HSC, §
- 22                    17920.3(a)(14); CBC, 116.1; IPMC, § 304.1.)
- 23           iii.   Unsecured building. (CBC, § 116.1.)
- 24           iv.    Deteriorated damaged doors. (IPMC, § 304.15.)
- 25           v.     Lack of adequate heating. (HSC, § 17920.3(a)(6).)
- 26           vi.    Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1.)
- 27           vii.   Hazardous electrical wiring. (IPMC, § 604.3.)
- 28           viii.   Inadequate plumbing resulting in leaking. (IPMC, § 504.1.)

- 1           ix.    Extensive unpermitted construction. (CBC, § 105.1.)
- 2           x.    Missing window screens. (HSC, § 17920.3(g)(2); CBC, § 116.1; IPMC, §
- 3                304.14.)
- 4           xi.    Damaged bathroom facilities. (HSC, § 17920.3(a)(2), (c); CBC, § 116.1.)
- 5           xii.   Damaged windows. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 6           xiii.   General dilapidation and improper maintenance. (HSC, § 17920.3(a)(14);
- 7                CBC, 116.1.)
- 8           xiv.    Excessive storage. (HSC, §§ 17920.3(a), (h), (j); CBC, § 116.1; CRC, §
- 9                311.1; CFC, §§ 1030.1, 1030.2, 1030.3.)
- 10          xv.    Water damage to exterior and interior structures. (HSC, § 17920.3(a)(14);
- 11                CBC, 116.1; IPMC, §§ 304.1, 305.1.)
- 12          xvi.    Insufficient bedroom area. (IPMC, § 404.4.1.)
- 13          xvii.   Structurally damaged ceiling. (HSC, § 17920.3(a)(14), (b)(6), (b)(7),
- 14                (g)(4); CBC, § 116.1.)
- 15          xviii.   Insect infestation. (HSC, § 17920.3(a)(12); CBC, § 116.1; CPC, § 405.1.)
- 16          xix.    Damaged doorways. (HSC, § 17920.3(b); CBC, § 116.1; IPMC, § 305.3.)
- 17          xx.    Damaged and unsanitary kitchen facility. (HSC, § 17920.3(a)(13); CBC,
- 18                § 116.1.)
- 19          xxi.    Missing smoke detectors. (CFC, § 1103.7.5.1; CBC, §§ 420.5, 907.2.8.)
- 20          xxii.   Portions of ceiling likely to detach. (HSC, § 17920.3(b)(6); 304.7.)
- 21          xxiii.   Handrails and guards are improperly fastened. (IPMC, § 304.12.)
- 22          **K. 1816 State Street, Santa Barbara, California, 93101, APN 027-032-021;**
- 23            i.    Unpermitted construction. (CBC, § 105.1)
- 24            ii.    Unsanitary and dilapidated vacant structure. (CBC, 301.3.)
- 25            iii.    Excessive storage. (HSC, §§ 17920.3(a), (h), (j); CBC, § 116.1; CRC, §
- 26                311.1; CFC, §§ 1030.1, 1030.2, 1030.3.)
- 27            iv.    Hazardous electrical wiring. (HSC, § 17920.3(d).)
- 28

- 1 v. Damaged outlets. (HSC, § 17920.3(d); CBC, § 116.1; CEC, §§ 404.6,  
2 404.9.)
- 3 vi. Unsecured Building. (CBC, § 116.1.)
- 4 vii. Unsanitary conditions in bathroom. (HSC, § 17920.3(b); CBC, § 116.1;  
5 CPC § 309.2.) and,
- 6 L. **1335 Mission Ridge Road**, Santa Barbara, California, 93103, APN 019-210-  
7 005
- 8 i. Structurally damaged ceiling. (HSC, § 17920.3(a)(14), (b)(6), (b)(7),  
9 (g)(4); CBC, § 116.1.)
- 10 ii. Structurally damaged walls. (HSC, § 17920.3(a)(14), (c); CBC, § 116.1.)
- 11 iii. Dilapidated and deteriorating deck. (HSC, § 17920.3(c); CBC, § 116.1;  
12 IPMC, § 304.10.)
- 13 iv. Extensive unpermitted construction. (CBC, § 105.1.)
- 14 v. Illegal storage on exterior premises. (HSC, §§ 17920.3(a), (h), (j); CBC, §  
15 116.1; CRC, § 311.1; CFC, §§ 1030.1, 1030.2, 1030.3; SBMC, §  
16 28.87.190.)
- 17 vi. Excessive storage. (HSC, §§ 17920.3(a), (h), (j); CBC, § 116.1; CRC, §  
18 311.1; CFC, §§ 1030.1, 1030.2, 1030.3; SBMC, § 28.87.190.)
- 19 vii. Unsanitary storage. (IPMC, § 302.1.)
- 20 viii. Rodent harborage. (HSC, § 17920.3(a); IPMC, § 302.5.)
- 21 ix. Damaged outlets. (HSC, § 17920.3(d); CBC, § 116.1; CEC, §§ 404.6,  
22 404.9.)
- 23 x. Hazardous electrical wiring. (HSC, § 17920.3(d); CBC, § 116.1.)
- 24 xi. Damaged outlets. (HSC, § 17920.3(d); CBC, § 116.1; CEC, §§ 404.6,  
25 404.9.)
- 26 xii. Inaccessible or unavailable occupant parking. (SBMC, §§ 28.90.100,  
27 28.90.060.)
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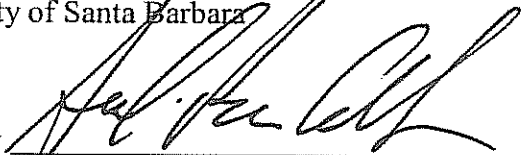
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4. For appointment of a Receiver to assume control of all of the Defendants' business properties with unlawful conditions which are located within the City of Santa Barbara in order to abate and remediate unlawful conditions;
5. For civil penalties in the amount of \$2,500 for each act of unfair competition;
6. For civil penalties in the amount of \$5,000 for each act of unfair competition perpetrated against one or more senior citizens or disabled persons;
7. For costs of suit;
8. For attorneys' fees as authorized by law; and
9. For such other and further relief as the Court deems just and proper.

DATED: February 16, 2017

ARIEL PIERRE CALONNE  
City Attorney/City Prosecutor  
City of Santa Barbara

By



Ariel Pierre Calonne  
City Attorney/City Prosecutor  
Attorneys for the People of the State of  
California