

1 DAVID CHIU, State Bar #189542
City Attorney
2 YVONNE R. MERÉ, State Bar #173594
Chief Deputy City Attorney
3 WADE CHOW, State Bar #168527
Chief Attorney
4 Neighborhood and Resident Safety Division
HUNTER W. SIMS III, State Bar #266039
5 Deputy City Attorneys
Fox Plaza
6 1390 Market Street, Seventh Floor
San Francisco, California 94102-5406
7 Telephone: (415) 554-4259 (Sims)
Facsimile: (415) 437-4644
8 E-Mail: hunter.sims@sfcityatty.org

9 Attorneys for Plaintiffs
10 CITY AND COUNTY OF SAN FRANCISCO and
11 PEOPLE OF THE STATE OF CALIFORNIA

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN FRANCISCO

14 UNLIMITED JURISDICTION

15 CITY AND COUNTY OF SAN
16 FRANCISCO, a Municipal Corporation; and
the PEOPLE OF THE STATE OF
17 CALIFORNIA, by and through David Chiu,
City Attorney for the City and County of San
Francisco,

18 Plaintiffs,

19 vs.

20 DEBRA LOI MY LA, in her individual
21 capacity and as Trustee of the DEBRA LA
22 FAMILY TRUST 2012, TENDERLOIN.
MARKET AND DELI, MOHSEN MUSED,
23 an individual, MUNASR MUSED, an
individual, SAQR ALWAJEM, an individual,
24 MOHAMMED MATHANA, an individual,
HEMED ALWAJEM, an individual,
25 ABDALJALEL ALWADI, an individual, DOE
1 through DOE 10,

26 Defendants.

Case No.

**COMPLAINT FOR INJUNCTIVE AND
DECLARATORY RELIEF AND PENALTIES**

Type of Complaint [42] Other

27
28 ///

1 The CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation, and the PEOPLE
2 OF THE STATE OF CALIFORNIA, by and through San Francisco City Attorney DAVID CHIU
3 (collectively “Plaintiffs”), file their Complaint against Defendants DEBRA LA, in her individual
4 capacity and as Trustee of the DEBRA LA FAMILY TRUST 2021, TENDERLOIN MARKET AND
5 DELI, MOHSEN MUSED, an individual, MUNASR MUSED, an individual, SAQR ALWAJEM, an
6 individual, MOHAMMED MATHANA, an individual, HEMED ALWAJEM, an individual,
7 ABDALJALEL ALWADI, an individual, and DOE ONE through DOE TEN (collectively
8 “Defendants”). PLAINTIFFS hereby allege as set forth below:

9 **INTRODUCTION**

10 1. The residents of the Tenderloin neighborhood have suffered for at least a decade due to
11 the DEFENDANTS’ illegal acts and business practices at the property located at 200 Leavenworth
12 Street, San Francisco, California, on the corner of Turk and Leavenworth Streets. DEFENDANTS
13 operate a business at 200 Leavenworth Street that contributes to the criminal activity in the
14 Tenderloin. This action seeks to put an end to that activity.

15 2. DEFENDANTS have owned and operated the TENDERLOIN MARKET AND DELI
16 since at least 2013. Due to the illegal gambling and sale of drug paraphernalia occurring at the
17 property, the TENDERLOIN MARKET AND DELI has attracted criminal and nuisance activity to the
18 surrounding community, necessitating police intervention and adversely affecting the neighborhood
19 and the health, safety, and well-being of those who live and work in the area, as well as the general
20 public.

21 3. By allowing illegal gambling to occur at the TENDERLOIN MARKET AND DELI,
22 DEFENDANTS have maintained the property as a nuisance in violation of California Penal Code
23 sections 11225-11235 (“Red Light Abatement Law”).

24 4. By allowing illegal gambling and the sale of drug paraphernalia to occur at the
25 TENDERLOIN MARKET AND DELI, DEFENDANTS have maintained the property as a public
26 nuisance in violation of California Civil Code sections 3479-3480.

27 5. By operating, and/or allowing the operation of, the TENDERLOIN MARKET AND
28 DELI in repeated violation of applicable state and local laws and as a nuisance, DEFENDANTS have

1 also demonstrated a pattern and practice of engaging in unlawful business practices in violation of the
2 Unfair Competition Law (“UCL”), California Business and Professions Code sections 17200-17210.

3 6. California’s Gambling Control Act (“GCA”), Business and Professions Code sections
4 19800 *et seq.* was passed in 1997. While gambling establishments have existed in California for over
5 100 years, the legal gambling industry prior to 1984 was almost entirely unregulated; California law
6 outlawed certain forms of gambling and left other forms free of government oversight or regulation.

7 7. With the passage of the GCA, the California Legislature recognized that “[u]nregulated
8 gambling enterprises are inimical to the public health, safety, welfare, and good order. Accordingly,
9 no person in this state has a right to operate a gambling enterprise except as may be expressly
10 permitted by the laws of this state and by the ordinances of local governmental bodies.” Business and
11 Professions Code section 19801(d).

12 8. California has long recognized the adverse impact of gambling on individuals and
13 communities and has consequently restricted legal gambling to the California Lottery, “card rooms,”
14 casinos operated by Native American tribes, and race tracks. State law and many local ordinances
15 make virtually all other forms of gambling expressly illegal and provide local governments both civil
16 and criminal remedies to address the crime and nuisance created by illegal gambling operations. *See*
17 Penal Code Chapter 10, sections 330-337 *et seq.* and 11225-11235; San Francisco Municipal Police
18 Code sections 325-327.

19 9. In order to lawfully operate a business in which drug paraphernalia is offered, sold, or
20 given away, the business must keep and display the drug paraphernalia in a separate room, and the
21 business must exclude minors not accompanied by a parent or legal guardian from entry. *See* Health
22 and Safety Code, Chapter 6, section 11364.5.

23 **PARTIES AND SUBJECT PROPERTY**

24 10. Plaintiff CITY AND COUNTY OF SAN FRANCISCO (the “CITY”) is a municipal
25 corporation organized and existing under and by virtue of the laws of the State of California, and is a
26 city and county. The CITY brings this action under the Red Light Abatement Law, California Civil
27 Code sections 3479, 3480, 3491, 3494, and California Code of Civil Procedure section 731.

28 ///

1 11. Plaintiff PEOPLE OF THE STATE OF CALIFORNIA (the “PEOPLE”), by and
2 through David Chiu, City Attorney of the City and County of San Francisco, bring this action pursuant
3 to the Red Light Abatement Law, the Unfair Competition Law, Civil Code Sections 3479, 3480, 3491,
4 2494, and Code of Civil Procedure Section 731.

5 12. Defendant DEBRA LA is sued as an individual and in her capacity as Trustee of the
6 DEBRA LA FAMILY TRUST 2021, (“LA FAMILY TRUST”). The LA FAMILY TRUST owns the
7 property where the TENDERLOIN MARKET AND DELI is located, 200 Leavenworth Street, San
8 Francisco, California, San Francisco Assessor’s Block 0338, Lot 013 (“PROPERTY”). DEBRA LA is
9 domiciled in San Francisco, California.

10 13. MOHSEN MUSED (“MOHSEN”), MUNASR MUSED (“MUNASR”), SAQR
11 ALWAJEM (“SAQR”), MOHAMMED MATHANA (“MATHANA”), HEMED ALWAJEM
12 (“HEMED”), and ABDALJALEL ALWADI (“ALWADI”) are individuals who own, manage and/or
13 operate the TENDERLOIN MARKET AND DELI, a commercial business located at 200
14 Leavenworth Street, in the City and County of San Francisco. The TENDERLOIN MARKET AND
15 DELI is an illegal gambling business, where patrons pay to play slot machines for the chance to win
16 cash payouts. MOHSEN owns the TENDERLOIN MARKET AND DELI and is the commercial
17 tenant of the PROPERTY. MUNASR, SAQR, MATHANA, HEMED and ALWADI manage and/or
18 operate the TENDERLOIN MARKET AND DELI along with MOHSEN. Actions taken, or omissions
19 made, by MOHSEN’S employees or agents in the course of their employment or agency at the
20 TENDERLOIN MARKET AND DELI are considered to be actions or omissions of MOHSEN for the
21 purposes of this Complaint. MOHSEN and MUNASR are domiciled in Oakland, California. SAQR
22 and HEMED are domiciled in Richmond, California. MATHANA is domiciled in California.
23 ALWADI is domiciled in San Francisco, California.

24 14. Defendants DOE ONE through DOE TEN are sued herein under fictitious names.
25 Plaintiffs do not at this time know the true names or capacities of said defendants, but pray that the
26 same may be alleged herein when ascertained.

27 ///

28 ///

GENERAL ALLEGATIONS

1
2 15. The TENDERLOIN MARKET AND DELI is a commercial business located on the
3 ground floor of 200 Leavenworth Street, San Francisco, California, on a busy commercial street in the
4 Tenderloin district of San Francisco. MOHSEN, MUNASR, SAQR, MATHANA, HEMED and
5 ALWADI own and/or operate TENDERLOIN MARKET AND DELI, which has been in operation
6 since at least 2013. MOHSEN leases the commercial space from the LA FAMILY TRUST.
7 MOHSEN, MUNASR, SAQR, MATHANA, HEMED and ALWADI manage the TENDERLOIN
8 MARKET AND DELI.

9 16. The TENDERLOIN MARKET AND DELI has the appearance of a convenience store.
10 However, Defendants MOHSEN, MUNASR, SAQR, MATHANA, HEMED and ALWADI ran a
11 gambling operation in a back room where they offered electronic slot machines.

12 17. The TENDERLOIN MARKET AND DELI offered a variety of slot machines,
13 including different varieties of “spinning reel” slot machine games. The slot machines accepted cash in
14 exchange for “points” or “credits” used to play the machines. The players won or lost the games
15 depending on chance. The outcome of the games was unpredictable to the patrons. The machines
16 tracked a player’s “wins,” and winnings were paid in cash by a cashier at the TENDERLOIN
17 MARKET AND DELI.

18 18. On April 28, 2024, a San Francisco Police Department Lieutenant entered the
19 TENDERLOIN MARKET AND DELI and saw three people playing gambling machines while a store
20 employee watched. The officer saw one of the players holding cash in his hand.

21 19. On July 17, 2024, members of the San Francisco Police Department pursued a fugitive
22 into the TENDERLOIN MARKET AND DELI. The pursuing officers entered a back room of the
23 TENDERLOIN MARKET AND DELI where they saw 5 electronic gaming machines and a
24 multiplayer table game as well as patrons playing those machines.

25 20. On September 10, 2024, members of the San Francisco Police Department obtained and
26 executed a search warrant at the TENDERLOIN MARKET AND DELI.

27 21. Members of the San Francisco Police Department found significant evidence of
28 criminal activity while executing the search warrant at the TENDERLOIN MARKET AND DELI.

1 Officers seized a loaded Glock 19 pistol and an additional loaded magazine, a pistol box, 7 electronic
2 gambling machines, \$6,153 in cash, and a money counting machine. Images of the some of the
3 electronic gambling machines seized are shown below.



17 22. The TENDERLOIN MARKET AND DELI's gambling operation is illegal under Penal
18 Code section 330b, which makes it unlawful for businesses to operate or possess, and property owners
19 to allow the operation or possession of, slot machines, which it defines as follows:

20 [A] machine, apparatus, or device that is adapted, or may readily be
21 converted, for use in a way that, as a result of the insertion of any piece
22 of money or coin or other object, or by any other means, the machine or
23 device is caused to operate or may be operated, and by reason of any
24 element of hazard or chance or of other outcome of operation
25 unpredictable by him or her, the user may receive or become entitled to
26 receive any piece of money, credit, allowance, or thing of value, or
27 additional chance or right to use the slot machine or device, or any
28 check, slug, token, or memorandum, whether of value or otherwise,
which may be exchanged for any money, credit, allowance, or thing of
value, or which may be given in trade, irrespective of whether it may,
apart from any element of hazard or chance or unpredictable outcome of
operation, also sell, deliver, or present some merchandise, indication of
weight, entertainment, or other thing of value.

1 23. The TENDERLOIN MARKET AND DELI’s gambling operation also violates San
2 Francisco Municipal Police Code section 325, which provides:

3 It shall be unlawful for any person, either as owner, lessee, agent,
4 employee, mortgagee or otherwise to operate, keep, maintain, rent, use
5 or conduct, within the City and County of San Francisco, any clock,
6 tape, slot or card machine, or any other machine, contrivance or device
7 upon which money is staked or hazarded upon chance or into which
8 money is paid, deposited, or played, upon chance or upon result of the
9 action of which money or any other article or thing of value is staked,
10 bet, hazarded, won or lost upon chance.

11 24. The TENDERLOIN MARKET AND DELI also sells drug paraphernalia to individuals
12 who DEFENDANTS know will often use narcotics in plain view in front of the store. DEFENDANTS
13 sell straight glass pipes and Brillo pads that are used to ingest base rock cocaine, also known as
14 “crack.” In addition, DEFENDANTS sell glass pipes that are specifically designed to smoke
15 methamphetamine. During the September 10, 2024 search, officers observed dozens of these pipes
16 offered for sale near the cash register, which is an area accessible to minors.

17 25. Since the TENDERLOIN MARKET AND DELI has been in existence, criminal and
18 nuisance activity has plagued the area, necessitating police intervention and adversely affecting the
19 surrounding neighborhood. The neighborhood has experienced a rising number of thefts, assaults,
20 drug-related offenses and arrests of TENDERLOIN MARKET AND DELI customers wanted on
21 outstanding warrants. DEFENDANTS’ maintenance of the TENDERLOIN MARKET AND DELI
22 has interfered with the comfortable enjoyment of life and property in the surrounding community. Its
23 continued operation is a nuisance that threatens the health and safety of the neighborhood and the
24 well-being of those who live and work in the area, as well as the general public.

25 **FIRST CAUSE OF ACTION**
26 **FOR VIOLATION OF THE RED LIGHT ABATEMENT ACT BROUGHT BY PLAINTIFFS**
27 **PEOPLE OF THE STATE OF CALIFORNIA AND THE CITY AND COUNTY OF SAN**
28 **FRANCISCO AGAINST ALL DEFENDANTS**
 (Penal Code Sections 11225 -11235)

29 26. Plaintiffs PEOPLE OF THE STATE OF CALIFORNIA and the CITY AND COUNTY
30 OF SAN FRANCISCO hereby incorporate by reference paragraphs 1 through 25 above, as though
31 fully set forth herein.

1 27. DEFENDANTS operated, and/or permitted the operation of, an illegal gambling
2 establishment at the TENDERLOIN MARKET AND DELI by possessing and/or operating, or
3 permitting the sale of possession and operation of, “machine[s] or device[s]” that “may be operated,
4 and by reason of . . . hazard or chance or of other outcome of operation unpredictable by [the user], the
5 user may receive or become entitled to receive . . . [an] additional chance or right to use the slot
6 machine or device” or a “token, or memorandum . . . which may be exchanged for any money, credit,
7 allowance, or thing of value.” Penal Code section 330b(d). By possessing and/or operating, and/or
8 permitting the possession and/or operation of, these machines or devices, DEFENDANTS have
9 violated and continue to violate Penal Code section 330b(d) and San Francisco Municipal Police Code
10 sections 325-327. This illegal gambling operation constitutes a nuisance as a matter of law under
11 Penal Code section 11225.

12 28. Pursuant to Penal Code section 11230, PLAINTIFFS request that the Court order the
13 closure of the TENDERLOIN MARKET AND DELI for one year and impose civil penalties of
14 \$25,000.00 against each Defendant to prevent DEFENDANTS from continuing to maintain or permit
15 a nuisance at the PROPERTY.

16 29. Unless said nuisance is abated, the surrounding community and neighborhood, and the
17 residents and citizens of the City and County of San Francisco and the People of California, will suffer
18 irreparable injury and damage, in that said conditions will continue to be dangerous to the life, safety
19 or health of those who live and work near the PROPERTY and the general public.

20 30. PLAINTIFFS have no adequate remedy at law in that damages alone are insufficient to
21 protect the public from the present injury and harm caused by the conduct described above.

22 **SECOND CAUSE OF ACTION**
23 **FOR UNLAWFUL BUSINESS PRACTICES BROUGHT BY PLAINTIFF PEOPLE OF THE**
24 **STATE OF CALIFORNIA AGAINST ALL DEFENDANTS**
 (California Business and Professions Code Sections 17200-17210)

25 31. Plaintiff, the PEOPLE OF THE STATE OF CALIFORNIA, hereby incorporates by
26 reference paragraphs 1 through 30 above, as though fully set forth herein.

27 ///

28 ///

1 32. The PEOPLE bring this cause of action in the public interest in the name of the
2 PEOPLE OF THE STATE OF CALIFORNIA, pursuant to Business and Professions Code sections
3 17200 through 17210, in order to protect the residents and owners of properties adjoining the
4 TENDERLOIN MARKET AND DELI from the unlawful business practices committed by
5 DEFENDANTS in the operation of the TENDERLOIN MARKET AND DELI within the City and
6 County of San Francisco, State of California.

7 33. The violations of law described herein have been, and are being, carried out wholly or
8 in part within the City and County of San Francisco. The actions of DEFENDANTS are in violation
9 of the laws and public policies of the City and County of San Francisco and the State of California,
10 and are inimical to the rights and interest of the general public.

11 34. DEFENDANTS are now engaging in and, for a considerable period of time and at all
12 times pertinent to the allegations of this Complaint, have engaged in, unlawful business practices
13 prohibited by California's Unfair Competition Law by managing and operating, and/or allowing the
14 management and operation of, the TENDERLOIN MARKET AND DELI in violation of the following
15 laws:

- 16 • Penal Code sections 11225-11235 by allowing illegal gambling to occur at the
17 TENDERLOIN MARKET AND DELI;
- 18 • Penal Code section 330b by possessing and/or operating, or permitting the possession
19 and/or operation, of slot machines or devices (as defined in Penal Code section
20 330b(d)) at the TENDERLOIN MARKET AND DELI;
- 21 • San Francisco Municipal Police Code sections 325-327 by operating and/or keeping
22 slot machines or their equivalent at the TENDERLOIN MARKET AND DELI.
- 23 • Health and Safety Code section 11364.5 for unlawfully keeping and selling drug
24 paraphernalia in an area accessible to minors.
- 25 • Health and Safety Code section 11364.7 by delivering, furnishing, transferring, and
26 possessing with intent to deliver, furnish or transfer drug paraphernalia, knowing or
27 under circumstances where one reasonably should know that it will be used to ingest,
28 inhale or otherwise introduce into the human body a controlled substance.

1 35. DEFENDANTS are now engaging in and, for a considerable period of time and at all
2 times pertinent to the allegations of this Complaint, have engaged in, unfair business practices
3 prohibited by California's Unfair Competition Law, Business and Professions Code sections 17000-
4 17210 by attracting patrons through the offer of illegal gambling and drug paraphernalia. These
5 customers purchase legitimate products when they come to the TENDERLOIN MARKET AND DELI
6 to gamble or to buy drug paraphernalia when they otherwise would patronize the businesses of
7 DEFENDANTS' competitors.

8 36. As a direct and proximate result of the foregoing acts and practices, DEFENDANTS
9 have received income, profits, and other benefits, which they would not have received if
10 DEFENDANTS had not engaged in the violations of the Unfair Competition Law described in this
11 Complaint.

12 37. The PEOPLE have no adequate remedy at law in that damages are insufficient to
13 protect the public from the harm caused by the conditions described in this Complaint.

14 38. Unless injunctive relief is granted to enjoin the unlawful business practices of
15 DEFENDANTS, the PEOPLE will suffer irreparable injury and damage.

16 39. By engaging in unlawful business practices described herein, DEFENDANTS are each
17 subject to civil penalties in the amount of \$2,500.00 per violation, pursuant to Business and
18 Professions Code section 17206.

19 **THIRD CAUSE OF ACTION**

20 **PUBLIC NUISANCE**

21 **(California Civil Code Sections 3479 and 3480, and California Code of Civil Procedure
22 Section 731)**

23 40. PLAINTIFFS hereby incorporate by reference all of the foregoing paragraphs, as
24 though fully set forth herein.

25 41. DEFENDANTS and their employees have sold and offered for sale paraphernalia used
26 to ingest or inhale controlled substances at TENDERLOIN MARKET AND DELI. Such conduct
27 adversely affects public health, contributes to illegal drug activity, and contributes to other criminal
28 activity.

///
28

1 42. DEFENDANTS and their employees have operated an illegal gambling operation at
2 TENDERLOIN MARKET AND DELI. Such conduct adversely affects public health and contributes
3 to other criminal activity, including violent crimes such as robbery.

4 43. As described above, DEFENDANTS are now, and for a considerable period of time,
5 and at all times pertinent to the allegations in this Complaint have been, maintaining the PROPERTY
6 in such a manner as to constitute a continuing public nuisance within the meaning of Civil Code
7 sections 3479 and 3480. The practices described above are injurious to the health and safety of the
8 residents and the community, are offensive to the senses, and interfere with the comfortable enjoyment
9 of life and property. The practices described above also affect a considerable number of people and an
10 entire community and neighborhood.

11 44. At all times herein mentioned, DEFENDANTS have had notice and knowledge that the
12 PROPERTY constituted a public nuisance because of the multiple calls for service to the PROPERTY
13 by members of the San Francisco Police Department and prior civil investigations into
14 DEFENDANTS' conduct for the same illegal actions described above, but DEFENDANTS have taken
15 inadequate steps to abate the public nuisance.

16 45. PLAINTIFFS have no adequate remedy at law in that damages are insufficient to
17 protect the public from the present danger and harm caused by the conditions described herein.

18 46. Unless these nuisance conditions are abated, the occupants and neighbors of the subject
19 PROPERTY and the residents of the City and County of San Francisco will suffer irreparable injury
20 and damage because the nuisance conditions will continue to be injurious to the continuous enjoyment
21 of life and the free use of property of the neighbors and the public.

22 PRAYER

23 WHEREFORE, PLAINTIFFS pray that:

24 **Declaratory Relief**

25 1. The PROPERTY be declared a nuisance in violation of Penal Code sections 11225-
26 11235;

27 2. DEFENDANTS be declared to have engaged in unlawful business acts and practices in
28 violation of Business and Professions Code sections 17200-17210;

1 **Injunctive Relief**

2 3. The nuisance be preliminarily and permanently abated in accordance with Penal Code
3 sections 11225-11235;

4 4. All movable property used in the maintenance of the nuisance at the PROPERTY be
5 removed and sold, pursuant to Penal Code section 11230;

6 5. The TENDERLOIN MARKET AND DELI be closed for one year, pursuant to Penal
7 Code section 11230;

8 6. In the event the Court decides that any vacancy resulting from closure will be harmful
9 to the community, in lieu of closing the TENDERLOIN MARKET AND DELI, each Defendant be
10 ordered to pay damages in an amount equal to the fair market rental value of the commercial space
11 occupied by the TENDERLOIN MARKET AND DELI for one year, pursuant to Penal Code section
12 11230;

13 7. In the event that the Court does not order the TENDERLOIN MARKET AND DELI
14 closed, all DEFENDANTS, their agents, officers, lessees, managers, representatives, employees, and
15 anyone acting on their behalf, and their heirs and assignees be preliminarily and permanently enjoined
16 from operating, conducting, using, occupying, or in any way permitting the use of the TENDERLOIN
17 MARKET AND DELI as a nuisance pursuant to Penal Code sections 11225-11235;

18 8. DEFENDANTS be enjoined and restrained from occupying or operating, and/or
19 allowing the occupation or operation of, the TENDERLOIN MARKET AND DELI while the
20 conditions described in this Complaint exist and until all of the violations at the TENDERLOIN
21 MARKET AND DELI have been abated;

22 9. DEFENDANTS be ordered to cause the PROPERTY to conform to law, and maintain
23 such structures and all parts thereof in accordance with law;

24 10. Pursuant to California Business and Professions Code sections 17203-17204,
25 DEFENDANTS, their agents, officers, lessees, managers, representatives, employees, and anyone
26 acting on their behalf, and their heirs, successors, and assignees be enjoined from operating,
27 conducting, using, occupying, or in any way permitting the use of the TENDERLOIN MARKET AND
28 DELI in the unlawful business practices described in this Complaint;

1 11. DEFENDANTS, and each of them, inclusive, be enjoined from spending, transferring,
2 encumbering, or removing from California any money received from the TENDERLOIN MARKET
3 AND DELI or in payment for the unlawful acts alleged in the Complaint;

4 **Penalties**

5 12. The Court impose civil penalties of \$25,000.00 against each Defendant pursuant to
6 Penal Code section 11230;

7 13. DEFENDANTS be ordered to each pay a civil penalty of \$2,500.00 for each act of
8 unlawful or unfair competition, pursuant to Business and Professions Code section 17206;

9 **Fees and Costs**

10 14. DEFENDANTS be ordered to pay PLAINTIFFS ' reasonable attorney's fees and costs,
11 including the cost of investigation and discovery, pursuant to Civil Code section 3496(b).

12 15. PLAINTIFFS be awarded their costs incurred herein pursuant to Code of Civil
13 Procedure section 1032; and

14 16. The Court grant such other and further relief as this Court should find just and proper.
15

16 Date: October 30, 2024

17 DAVID CHIU
City Attorney
18 YVONNE R. MERÉ
Chief Deputy City Attorney
19 WADE CHOW
Chief Attorney
Neighborhood and Resident Safety Division
20 HUNTER SIMS
Deputy City Attorneys

21
22 By: _____


23 HUNTER W. SIMS III
Attorneys for Plaintiffs
24 CITY AND COUNTY OF SAN FRANCISCO and
PEOPLE OF THE STATE OF CALIFORNIA
25
26
27
28