26

27

28

1

2

3

4

5

6

7

8

9

Superior Court of California County of Los Angeles

JUL 12 2022

Sherri R. Carter, Executive Officer/Clerk of Court By: E. Sam, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES

CITY OF SANTA MONICA, Case No. 22SMCV00192 Plaintiff, Honorable H. Jay Ford v. FINAL JUDGMENT AND INJUNCTION JONATHAN LEE et al. PURSUANT TO STIPULATION Defendant. Department: O First Amended Complaint: March 7, 2022

Plaintiff, the City of Santa Monica, through its attorneys, Douglas Sloan, the City Attorney of the City of Santa Monica and by Gary Rhoades, Deputy City Attorney; and Defendants Jonathan Lee, Leon Lee, and Jenny Lee ("Defendants"), represented by AV Law Group, PC, stipulate to the entry of this Final Judgment and Injunction without the Court taking evidence, and the Court having considered the pleadings and good cause appearing:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff have judgment against Defendants as follows:

I. INTRODUCTION

Plaintiff filed claims against Defendants under its Housing Anti-Discrimination

Ordinance. After good faith negotiations between the parties and their attorneys, the parties agreed to resolve the matter through a Stipulated Judgment against Defendants.

Court has jurisdiction of the subject matter and the parties. Venue is appropriate in this Court.

II. INJUNCTION

Pursuant to the Court's authority for equitable remedies, Defendants shall do the following:

- 1) By October 1, 2022, complete a City-approved fair housing training; and
- 2) By July 15, 2022, adopt a City-approved written fair housing policy for his rental property; and
- 3) By July 15, 2022, accept the Housing Choice Program ("Section 8") voucher of Liliana Dasic; and
- 4) To facilitate the processing of the voucher, the Defendants shall cooperate with the City's Housing Authority and complete all needed paperwork in a timely matter.

Defendants shall also obey all laws in Chapters 4.28 and 4.56 of the Santa Monica Municipal Ordinance.

This Injunction shall apply commencing the day of entry of this Judgment.

III. ENFORCEMENT OF INJUNCTION

If the Plaintiff learns of facts or allegations which if true could constitute a violation of the Injunction, notice of the potential violation shall be given to Defendants. The Defendant will have one week to dispute the alleged violation before Plaintiff pursues the violations in court.

If a court finds that Defendants has violated the Injunction after this order, then Defendants will each be subject to a minimum penalty of \$10,000.00 per violation.

IV. MONETARY RELIEF

Defendants shall deliver to Plaintiff's counsel a total of \$20,000.00 in full satisfaction of all fines, penalties, fees, assessments, restitution, unjust enrichment, damages, attorneys' fees and costs of investigation or litigation. The total amount shall be split into two payments, both in the form of a cashier's check or money order. The first payment shall be \$12,000 and delivered to Plaintiff's counsel within ten (10) days after entry of judgment. The second payment shall be \$8,000 and delivered within two (2) months after entry of judgment. Payments shall be made payable to "City of Santa Monica" and sent to the Santa Monica City Attorney's Office at 1685 Main St., 3rd Floor, Santa Monica CA 90401.

V. OTHER PROVISIONS

This judgment shall constitute an adjudication on the merits of the claims alleged in the Complaint and shall bar re-litigation of those claims.

The Parties waive the right to appeal this Judgment as to form or content.

If an ambiguity arises regarding any provision of this Judgment that requires interpretation, there is no presumption that documents should be interpreted against any party. The presumption in Civil Code section 1654 is not applicable.

Pursuant to the Court's inherent authority, the Court shall retain jurisdiction for the purpose of enforcing this Judgment and enabling any party to this Judgment to apply to the Court for such further orders and directions as necessary and appropriate to construe, carry out, enforce, interpret, or modify this Judgment, or to punish violations of this Judgment.

This Judgment shall be binding immediately upon its signing by the Court and its filing, without a Notice of Entry of Final Judgment.

The parties agree that the clerk may enter this Judgment immediately.

Dated: 7 - /2 - 2022

JUDGE OF THE SUPERIOR COURT

H. Jay Ford III

PROOF OF SERVICE 1 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 2 I declare that I am over the age of 18 years and not a party to the within action. I am employed in the 3 County of Los Angeles, State of California. My business address is: 1543 7th St., Suite 400, Santa Monica, CA 90401. On July 7, 2022, I served the foregoing document described as: 4 FINAL JUDGMENT AND INJUNCTION PURSUANT TO STIPULATION 5 on the following parties: 6 7 Gary Rhoades Deputy City Attorney 8 gary.rhoades@santamonica.gov 1685 Main St., Room 310 9 Santa Monica, CA 90401 10 BY 1st CLASS MAIL: I deposited such envelope in the mail at Santa Monica, California. The 11 envelope was mailed with postage thereof fully prepaid. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. postal service on that same 12 day in the ordinary course of business. I am aware that postal service is presumed on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal 13 cancellation date or postage meter date is more than one day after date of deposit mailing in affidavit. 14 BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the office of the addressee, or by hand to the addressee or his representative. 15 X BY ELECTRONIC SERVICE: I caused the documents to be sent to the persons at the electronic 16 service address listed above. 17 BY FASCIMILE TRANSMISSION: The facsimile machine I used complied with California Rules of Court, 2003(3) and no error was reported by the machine. Pursuant to Rule 2005(I), I caused the machine 18 to print a record of the transmission, a copy of which is attached to this proof of service. 19 _ (State) I declare under the penalty of perjury under the laws of the State of California that he above is 20 true and correct. 21 (Federal) I declare that I am employed in the office if a member of the bar of this court at whose direction the service was made 22 Executed on July 7, 2022, at Los Angeles, California. 23 1an \$ 24 25

26

27

28