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BY: [Signature] DEPUTY

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14 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN  
15

16 The People Of The State Of California, )  
17 Plaintiff, )  
18 v. )  
19 SHALINI KUMAR LATA, individually and as )  
a sole proprietor d.b.a. CENTRAL VALLEY )  
20 UST ENVIRONMENTAL SERVICES; )  
CENTRAL VALLEY UST ENVIRONMENTAL )  
21 SERVICES, a sole proprietorship, and DOES 1 )  
THROUGH 20, inclusive )  
22 Defendant(s), )  
23

Case No. CV027000 )  
COMPLAINT FOR INJUNCTION, )  
CIVIL PENALTIES AND OTHER RELIEF )  
(Business & Professions Code §17203)

24  
25 1. The authority of the Attorney General of the State of California and the District  
26 Attorney of San Joaquin County to bring this action is derived from statutory language of the State  
27 of California, specifically Business and Professions Code section 17203, 17204 and 17206, which  
28 allows for actions to be brought in the name of the People of the State of California in a superior

1 court for an injunction against any person who engages, had engaged, or proposes to engage in  
2 unfair competition and for civil penalties for each act of unfair competition.

3 2. THE PEOPLE OF THE STATE OF CALIFORNIA, by and through BILL  
4 LOCKYER, Attorney General of the State of California, and by and through JAMES P. WILLETT,  
5 District Attorney of San Joaquin County, acting to protect the public as consumers from deception,  
6 fraud, and misrepresentation, and as competitors from unlawful, unfair, and fraudulent business  
7 practices, bring this action in the public interest in the name of THE PEOPLE OF THE STATE OF  
8 CALIFORNIA and hereby allege:

9 JURISDICTION AND VENUE

10 3. The defendants transact business within the County of San Joaquin and elsewhere  
11 throughout the State of California. The alleged violations of the law, hereinafter described, have  
12 been carried out within San Joaquin County and elsewhere throughout the State of California. The  
13 alleged actions of the defendants and each of them, jointly and separately, as set out below, are in  
14 violation of the law and public policy of the State of California. Unless enjoined and restrained by  
15 an order of this court, the defendants will continue to retain the means to engage in unlawful action  
16 and practices and courses of conduct set out below.

17 DEFENDANTS

18 4. Defendant SHALINI KUMAR LATA, individually and as a sole proprietor d.b.a.  
19 CENTRAL VALLEY UST ENVIRONMENTAL SERVICES, is, and at all times relevant herein  
20 was, engaged in the business of DESIGNATED UNDERGROUND STORAGE TANK  
21 OPERATOR, located at 1918 ROSEMARIE LANE, APT. #108, STOCKTON, CALIFORNIA.

22 5. Defendant CENTRAL VALLEY UST ENVIRONMENTAL SERVICES, a sole  
23 proprietorship, a business of unknown type of organization, is, and at all times relevant herein was,  
24 engaged in the business of DESIGNATED UNDERGROUND STORAGE TANK OPERATOR,  
25 located at 1918 ROSEMARIE LANE, APT. #108, STOCKTON, CALIFORNIA.

26 6. Defendant DOES ONE through TWENTY are connected and responsible for the acts  
27 complained of below. Their real names are unknown at this time, and the People will amend this  
28 complaint at a later date when the true identities of DOES ONE through TWENTY are discovered.



1 c. Submitting Falsified ICC California UST Operator Exam Results to Certified Unified  
2 Program Agency's (CUPAs) in the State of California, including but not limited to Lake County,  
3 San Joaquin County, Sonoma County, and Yolo County.

4 PRAYER FOR RELIEF

5 WHEREFORE, Plaintiff prays for the following relief:

6 1. Defendants be immediately and permanently restrained and enjoined from engaging  
7 in or performing, directly or indirectly, any and all of the following acts:

8 a. Engaging in any of the unlawful acts of unfair competition set forth in the  
9 First Cause of Action of this complaint as well as any other violation of the Business and Professions  
10 Code sections 17200 through 17208;

11 2. For violation of the First Cause of Action, that defendants herein be assessed a civil  
12 penalty of TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00), for each act of unfair  
13 competition, in an amount according to proof, but not less than FIFTY THOUSAND DOLLARS  
14 (\$50,000.00), pursuant to Business and Professions Code section 17206;

15 3. Plaintiff recover its costs and agencies costs.

16 4. Plaintiff recover its attorney's fees.

17 5. Plaintiff have such other and further relief as the nature of the case may require and  
18 that the court deems proper to fully dissipate the effects of the unlawful and unfair acts complained  
19 of herein.

20  
21 RESPECTFULLY SUBMITTED,

22 Dated: 7/21/07

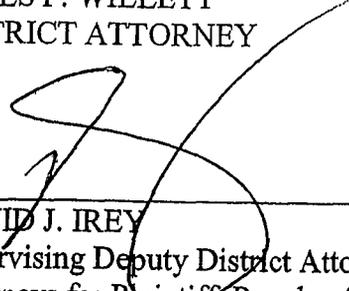
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Dated: 7/22/05

JAMES P. WILLETT  
DISTRICT ATTORNEY

  
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Supervising Deputy District Attorney  
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Dated: 7/22/05

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