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STEPHANIE BOHRER, CLERK  
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DEPUTY

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13 San Rafael, CA 94903-4189

14 *Attorneys for the People of the State of California*

15 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN**  
16 **STOCKTON BRANCH**

17 THE PEOPLE OF THE STATE OF CALIFORNIA,  
18 Plaintiff,  
19  
20 v.  
21  
22 HARMONY COMMUNITIES, INC., a California  
Corporation; PARTNERS REAL ESTATE, INC., a  
23 California Corporation,  
24 Defendants.

) No. STK-CV-UBT-2024-0007043  
) **FINAL JUDGMENT AND**  
) **INJUNCTION PURSUANT TO**  
) **STIPULATION**  
)  
) DEPT.

25  
26 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, having filed its complaint  
27 herein, through their attorneys, RONALD FREITAS, San Joaquin County District Attorney, by  
28 JENNIFER KIBBE DAY, Deputy District Attorney, and DAN DOW, San Luis Obispo County

JUL 26 2024

1 District Attorney, by KEN JORGENSEN, Deputy District Attorney, and LISA A. SMITTCAMP,  
2 Fresno County District Attorney, by ADAM KOOK, Deputy District Attorney, and LORI E.  
3 FRUGOLI, Marin County District Attorney, by ANDRES H. PEREZ, Deputy District Attorney; and  
4 REYNOLDS TILBURY WOODWARD LLP, by TORY EDWARD GRIFFIN, a licensed California  
5 attorney for Defendants HARMONY COMMUNITIES, INC., a California corporation, and  
6 PARTNERS REAL ESTATE, INC., a California corporation hereto have stipulated and consented to  
7 the entry of this Final Judgment and Permanent Injunction Pursuant to Stipulation ("Final  
8 Judgment") without the taking of proof, and without this Final Judgment being construed as an  
9 admission by Defendants of any fact, liability, issue of law, conclusion of law or violation of any  
10 statutory or regulatory law. This court having considered the pleadings and the Stipulation for Entry  
11 of Final Judgment, and good cause appearing therefore;

12 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

13 **JURISDICTION**

14 1. This court has jurisdiction of the subject matter of this action and each of the parties  
15 hereto.

16 **APPLICABILITY**

17 2. The injunctive provisions of this Final Judgment are applicable to Defendants and  
18 their respective officers, agents, brokers, representatives, successors, assignees, and all persons,  
19 partnerships, corporations, and other entities acting under, by, through, on behalf of, or in concert  
20 with Defendants, with actual or constructive knowledge of this Final Judgment. This Final Judgment  
21 is also applicable to any and all subsidiaries of the Defendants and their respective officers, agents,  
22 brokers, representatives, successors, assignees and all persons, partnerships, corporations, and other  
23 entities acting under, by, through, on behalf of, or in concert with any such subsidiary with actual or  
24 constructive knowledge of this Final Judgment.

25 **INJUNCTIVE RELIEF**

26 3. Pursuant to Business and Professions Code section 17203, Defendant PARTNERS  
27 REAL ESTATE, INC., a California corporation and its agents and brokers are enjoined for a period  
28 of five years from posting representations or statements on a multiple listing service of recreational

1 vehicles sold within mobile home parks so as to lead a reasonable consumer to believe the RV was a  
2 manufactured home regulated by HUD, in violation of California Civil Code section 1088. In  
3 jurisdictions where the listing is posted on MLS, PARTNERS REAL ESTATE shall not use the  
4 description of "manufactured" within RV listings and shall clearly identify recreational vehicles as  
5 such within the listing. In jurisdictions where the listing is posted on the California Regional Multiple  
6 Listing Service (CRMLS), PARTNERS REAL ESTATE shall clearly identify the listing as a  
7 recreational vehicle in the public remarks section of the listing.

8 **MONETARY PROVISIONS**

9 4. **Settlement Amount.** Defendant shall pay a total of \$61,000 in settlement of this  
10 matter as set forth below and pursuant to Business and Professions Code section 17206:

11 **Civil Penalties.**

12 (a) Defendant HARMONY COMMUNITIES, INC., a California corporation must pay  
13 TWENTY-ONE THOUSAND DOLLARS (\$21,000.00) as civil penalties pursuant to  
14 Business and Professions Code section 17206, which shall be distributed to the  
15 prosecuting agencies bringing this action pursuant to Government Code section 26506:

16 Office of the Fresno District Attorney	\$5,250
17 Office of the Marin District Attorney	\$5,250
18 Office of the San Joaquin District Attorney	\$5,250
19 Office of the San Luis Obispo District Attorney	\$5,250

20 (b) Defendant PARTNERS REAL ESTATE, INC., a California corporation must pay  
21 TWENTY THOUSAND DOLLARS (\$20,000.00) as civil penalties pursuant to Business  
22 and Professions Code section 17206, which shall be distributed to the prosecuting  
23 agencies bringing this action pursuant to Government Code section 26506:

24 Office of the Fresno District Attorney	\$5,000
25 Office of the Marin District Attorney	\$5,000
26 Office of the San Joaquin District Attorney	\$5,000
27 Office of the San Luis Obispo District Attorney	\$5,000

28

1 **Cy Pres**

2 (c) Defendants, jointly and severely, shall pay FIVE THOUSAND DOLLARS (\$5,000) in  
3 restitution under the doctrine of *cy pres* pursuant to Business and Professions Code §§  
4 17203 and 17535 to the Central California Legal Services, a non-profit corporation, for  
5 the purpose of providing free legal assistance relating to housing issues.

6 **Cost Recovery.**

7 (d) Defendants, jointly and severely, must pay the People for investigative and prosecution  
8 costs the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.000) which shall be made  
9 payable in four separate checks as follows:

10 Office of the Fresno District Attorney	\$2,000.00
11 Office of the Marin District Attorney	\$2,000.00
12 Office of the San Joaquin District Attorney	\$2,000.00
13 Office of the San Luis Obispo District Attorney	\$9,000.00

14 **Filing Fee.**

15 (e) Defendant is responsible for the uniform fee for filing the first paper in a civil action or  
16 proceeding in the Superior Court. The amount of the filing fee is FOUR HUNDRED  
17 THIRTY-FIVE DOLLARS (\$435.00). Said payment shall be made payable to the SAN  
18 JOAQUIN COUNTY SUPERIOR COURT and delivered to the San Joaquin County  
19 Office of the District Attorney, Consumer Fraud Unit, at time of signing.

20 5. **Delivery of Settlement Funds.** Delivery of the full amount as set forth in subsections  
21 (a), (b), (c), (d) and (e) above shall be made within 14 days from the time of signing this Final  
22 Judgment. All settlement funds shall be delivered to Jennifer Day, Office of the San Joaquin  
23 County District Attorney, 222 E. Weber Street, Stockton, CA 95202.

24 6. **Payment of litigation expenses and fees.** Defendants shall pay their own attorney  
25 fees, expert witness fees and costs, or any other costs of litigation or investigation incurred to date.

26 **EFFECT OF FINAL JUDGMENT**

27  
28 7. This Final Judgment is a final and binding resolution and settlement of all claims,

1 violations, or causes of action that were alleged by the People in the Complaint.

2 8. Jurisdiction is retained for the purpose of enabling any party to the Final Judgment to  
3 apply to the Court for such further orders and directions as may be necessary and appropriate for the  
4 construction and carrying out of the Final Judgment, for the modification or dissolution of any  
5 injunctive provisions hereof, for enforcement of compliance herewith, or for the punishment of  
6 violations hereof.

7 9. This Judgment has been reviewed by the Court, and based upon the representations of  
8 the parties, the Court finds that it has been entered in good faith and is, in all respects, fair, just, and  
9 equitable to protect the public and the individuals who may have been affected by the issues related  
10 as more fully described in the Complaint.

11 10. This Final Judgment shall go into effect immediately upon entry hereof. Entry is  
12 authorized immediately upon filing.

13 Dated: *July 31, 2024*

*George Abdallah*  
14 JUDGE OF THE SUPERIOR COURT  
15 GEORGE J. ABDALLAH, JR.  
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1 *People of the State of California v.*  
2 *HARMONY COMMUNITIES, INC., a California Corporation; PARTNERS REAL ESTAE, INC.,*  
3 *a California Corporation.*

4 San Joaquin County Case No. STK-CV-UBT-2024-0007043

5 **PROOF OF SERVICE**

6 I, Julie Sanchez, declare that I am employed in the County of San Joaquin; I am over the  
7 age of eighteen years and not a party to the within entitled cause; my business address is 222 E.  
8 Weber Avenue, First Floor, Room 101, P.O. Box 990, Stockton, CA 95201.


9 On June 21, 2024, at 8:30 AM, I served the **FINAL JUDGMENT AND INJUNCTION**  
10 **PURSUANT TO STIPULATION** in said cause, by placing a true copy thereof enclosed in  
11 sealed envelope for collection and **CERTIFIED** mailing, in the course of ordinary business  
12 practice, with correspondence of the District Attorney's Office of San Joaquin County located at  
13 222 E. Weber Avenue, First Floor, Room 101, P.O. Box 990, Stockton, CA 95201, addressed as  
14 follows:

15 **TORY E. GRIFFIN, PARTNER**  
16 **REYNOLDS, TILLBURY, WOODWARD, LLC**  
17 **11601 BLOCKER DRIVE, STE 105**  
18 **AUBURN, CA 95603**

19 I am familiar with the practice of the District Attorney's Office of San Joaquin County for  
20 collection and processing of correspondence for mailing with the United States Postal Service. It  
21 is the practice that correspondence is stamped with postage thereon fully prepaid and deposited  
22 with the United States Postal Service the same day it is submitted for mailing.

23 I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct.

25 Dated: June 21, 2024

26   
27 Julie Sanchez  
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