

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
CENTRAL DIVISION**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

CT No. M236888CE

COMPLAINT-MISDEMEANOR

JOHN IRADJ NOBEL,
dob 12/15/1939;

MAHIN NOBEL,
dob 04/02/1947;

DEV DATT NIRANJANBHAI PATEL,
dob 05/09/1983;

Defendants

PC296 DNA TEST STATUS SUMMARY

Defendant	DNA Testing Requirements
NOBEL, JOHN IRADJ	Manual review of DNA status is required
NOBEL, MAHIN	Manual review of DNA status is required
PATEL, DEV DATT NIRANJANBHAI	Manual review of DNA status is required

CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	HS17920.3(a)(6) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEV DATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
2	HS17920.3(a)(12) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEV DATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
3	HS17920.3(a)(13) NOBEL, JOHN IRADJ	Misdemeanor	6 Mos/\$1,000		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
4	HS17920.3(a)(14) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
5	HS17920.3(d) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
6	HS17920.3(k) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
7	SDMC121.0302(a) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
8	SDMC121.0302(a) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
9	SDMC121.0302(a) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		
10	SDMC54.0405(b) NOBEL, JOHN IRADJ NOBEL, MAHIN PATEL, DEVDATT NIRANJANBHAI	Misdemeanor	6 Mos/\$1,000		

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - SUBSTANDARD BUILDING-INADEQUATE HEATING

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, use, and permit the maintenance and use of a building, dwelling unit, guest room and surrounding yard and premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in such a condition that it endangers the life, limb, health, property, safety and welfare of the public and the occupants thereof, to wit: maintaining lack of adequate heating, in violation of HEALTH AND SAFETY CODE SECTION 17920.3(a)(6), a misdemeanor pursuant to Health and Safety Code section 17995.

COUNT 2 - SUBSTANDARD BUILDING - INFESTATION OF INSECTS, VERMIN, RODENTS

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, use, and permit the use of a building, dwelling unit, guest room and surrounding yard and premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in such a condition that it endangers the life, limb, health, property, safety and welfare of the public and the occupants thereof, to wit: maintaining inadequate sanitation caused by infestation of insects, vermin, or rodents, in violation of HEALTH AND SAFETY CODE SECTION 17920.3(a)(12), a misdemeanor pursuant to Health and Safety Code section 17995.

COUNT 3 - SUBSTANDARD BUILDING-VISIBLE MOLD GROWTH

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, use, and permit the maintenance and use of a building, dwelling unit, guest room and surrounding yard and premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in such a condition that it endangers the life, limb, health, property, safety and welfare of the public and the occupants thereof, to wit: maintaining visible mold growth, in violation of HEALTH AND SAFETY CODE SECTION 17920.3(a)(13), a misdemeanor pursuant to Health and Safety Code section 17995.

COUNT 4 - SUBSTANDARD BUILDING-GENERAL DILAPIDATION/IMPROPER MAINTENANCE

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, use, and permit the maintenance and use of a building, dwelling unit, guest room and surrounding yard and premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in such a condition that it endangers the life, limb, health, property, safety and welfare of the public and the occupants thereof, to wit: maintaining inadequate sanitation caused by general dilapidation and improper maintenance, in violation of HEALTH AND SAFETY CODE SECTION 17920.3(a)(14), a misdemeanor pursuant to Health and Safety Code section 17995.

CHARGES (cont'd)

COUNT 5 - SUBSTANDARD BUILDING-IMPROPER WIRING

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, use, and permit the maintenance and use of a building, dwelling unit, guest room and surrounding yard and premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in such a condition that it endangers the life, limb, health, property, safety and welfare of the public and the occupants thereof, to wit: failure to maintain wiring in a good and safe working condition, in violation of HEALTH AND SAFETY CODE SECTION 17920.3(d), a misdemeanor pursuant to Health and Safety Code section 17995.

COUNT 6 - SUBSTANDARD BUILDING-INADEQUATE MAINTENANCE

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, use, and permit the maintenance and use of a building, dwelling unit, guest room and surrounding yard and premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in such a condition that it endangers the life, limb, health, property, safety and welfare of the public and the occupants thereof, to wit: maintaining a building and portion thereof as an unsafe building due to inadequate maintenance, in violation of HEALTH AND SAFETY CODE SECTION 17920.3(k), a misdemeanor pursuant to Health and Safety Code section 17995.

COUNT 7 - USE OF A PREMISES WITHOUT A PERMIT OR VARIANCE

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain and use a premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in violation of the Land Development Code, without a required permit, contrary to permit conditions, and without a required variance, to wit: using and maintaining a structure regulated by the Land Development Code that has been erected, constructed, enlarged, altered, repaired, improved, converted, permanently relocated, and partially demolished without first obtaining a Building Permit as required by San Diego Municipal Code section 129.0202(a), in violation of SAN DIEGO MUNICIPAL CODE SECTION 121.0302(a), a misdemeanor pursuant to San Diego Municipal Code sections 12.0201 and 121.0311.

COUNT 8 - USE OF A PREMISES WITHOUT A PERMIT OR VARIANCE

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain and use a premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in violation of the Land Development Code, without a required permit, contrary to permit conditions, and without a required variance, to wit: using and maintaining the installation, alteration, addition, and replacement of any electrical wiring, device, appliance, and equipment within and on any structure and premises without obtaining an Electrical Permit as required by San Diego Municipal Code section 129.0302, in violation of SAN DIEGO MUNICIPAL CODE SECTION 121.0302(a), a misdemeanor pursuant to San Diego Municipal Code sections 12.0201 and 121.0311.

CHARGES (cont'd)

COUNT 9 - USE OF A PREMISES WITHOUT A PERMIT OR VARIANCE

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain and use a premises, located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), in violation of the Land Development Code, without a required permit, contrary to permit conditions, and without a required variance, to wit: using and maintaining a plumbing system, and a portion of a plumbing system, that has been installed, altered, added to, and replaced within and on any structure and premises, without obtaining a Plumbing Permit as required by San Diego Municipal Code section 129.0402(a), in violation of SAN DIEGO MUNICIPAL CODE SECTION 121.0302(a), a misdemeanor pursuant to San Diego Municipal Code sections 12.0201 and 121.0311.

COUNT 10 - UNLAWFULLY ALLOW GRAFFITI TO REMAIN

On or about June 7, 2017, JOHN IRADJ NOBEL, MAHIN NOBEL, and DEVDATT NIRANJANBHAI PATEL did unlawfully maintain, permit and allow graffiti to be placed upon and to remain upon a structure located at 5344 Rex Avenue, San Diego, CA 92105 (Assessor Parcel Number 472-501-08-00), within his/her control, possession and ownership when the graffiti was visible from the street and other public and private property, in violation of SAN DIEGO MUNICIPAL CODE SECTION 54.0405(b), a misdemeanor pursuant to San Diego Municipal Code sections 12.0201 and 121.0311.

NOTICE: Any defendant named on this complaint who is on criminal probation for a misdemeanor offense within the City of San Diego or the City of Poway is, by receiving this complaint, on notice that the evidence presented to the court at the trial on this complaint is presented for a dual purpose: the People are seeking a conviction on the charges and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the trial. Defenses to either or both procedures should be considered and presented as appropriate at the trial.

Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER M236888CE, CONSISTS OF 10 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on August 28, 2017.


COMPLAINANT