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THE PEOPLE OF THE STATE OF CALIFORNIA

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

PEOPLE OF THE STATE OF CALIFORNIA,)	Case No.:
Plaintiff,)	COMPLAINT - MISDEMEANOR
vs.)	
01: AROUTIN BEHZAD)	Date: March 6, 2018
D.O.B.: 07/05/1987,)	Time: 8:30 a.m.
02: ARPI AZARIAN NAMAGERDI)	
D.O.B.: 09/23/1987,)	
Defendants.)	

The undersigned declarant and complainant states that she is informed and believes, and upon such information and belief declares that Defendants AROUTIN BEHZAD and ARPI AZARIAN NAMAGERDI (hereafter referred to as DEFENDANTS), did commit the following crime(s) at and in the above-named judicial district, in the County of Los Angeles, State of California.

COUNT ONE

(Permit Required)

On or about May 11, 2016, at and in the County of Los Angeles, DEFENDANT(s) did fail to obtain the required permits at or near 1420 Valley View Road, in the City of Glendale, California (to wit: complete interior removal/destruction, including fixtures and walls without a permit) in violation of

1 **Section R105.1 of Volume IB (Chapter 1, Division II)** of the Glendale Municipal Code (Building and
2 Safety Code), **a misdemeanor.**

3 **COUNT TWO**

4 **(Faulty Weather Protection)**

5 On or about May 11, 2016, at and in the County of Los Angeles, DEFENDANT(s) did maintain
6 faulty weather protection at or near 1420 Valley View Road, in the City of Glendale, California (to wit:
7 building is substandard due to ineffective waterproofing due to lack of roof (covering)) in violation of
8 **Section 1001.8(2) of Volume V** of the Glendale Municipal Code (Glendale Building and Safety Code), **a**
9 **misdemeanor.**

10 **COUNT THREE**

11 **(Permit Required)**

12 On or about February 13, 2018, at and in the County of Los Angeles, DEFENDANT(s) did fail to
13 obtain the required permits at or near 1420 Valley View Road, in the City of Glendale, California (to wit:
14 complete demolition of potentially historic single family home with no permit) in violation of **Section**
15 **R105.1 of Volume IB (Chapter 1, Division II)** of the Glendale Municipal Code (Glendale Building and
16 Safety Code), **a misdemeanor.**

17 **COUNT FOUR**

18 **(Unlawful Acts)**


19 On or about February 13, 2018, at and in the County of Los Angeles, DEFENDANT(s) did
20 commit unlawful act of demolition of structure at or near 1420 Valley View Road, in the City of
21 Glendale, California (to wit: complete demolition of potentially historic single family home with no
22 permit) in violation of the Building and Safety Code in violation of **Section R113.1 of Volume IB**
23 **(Chapter 1, Division II)** of the Glendale Municipal Code (Glendale Building and Safety Code), **a**
24 **misdemeanor.**
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COUNT FIVE

(Demolition Permit Applicability)

On or about February 13, 2018, at and in the County of Los Angeles, DEFENDANT(s) did demolish a structure without building department issuance of permit and/or Community Development Department clearance at or near 1420 Valley View Road, in the City of Glendale, California (to wit: complete demolition of potentially historic single family home) in violation of **Section 15.22.020** of the Glendale Municipal Code, a **misdemeanor**.

Dated this 14th day of February, 2018, I declare under penalty of perjury that the foregoing is true and correct.


Declarant and Complainant
Yvette Neukian
Assistant City Attorney