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ELECTRONICALLY FILED
Superior Court of California
County of Ventura

05/14/2026

K. Bieker
Executive Officer and Clerk

By:  Deputy Clerk
Ashley Pekarek

SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

GUADALUPE A. GUZMAN; LUPE AND
CARMEN GUZMAN REVOCABLE
FAMILY TRUST DATED JULY 24, 2015;
YEISI B. GUZMAN; GUADALUPE J.
GUZMAN; OFELIA GUZMAN; SANTA
PAULA HAY AND GRAIN AND
RANCHES, LLC; and DOES 1-50,
Inclusive,

Defendants.

COURT NO. 2026CUMC066236

**COMPLAINT FOR PERMANENT
INJUNCTION; CIVIL PENALTIES
AND OTHER EQUITABLE RELIEF**

Plaintiff, The People of the State of California, by and through Erik Nasarenko, District Attorney of the County of Ventura, State of California, is informed and believes and based thereon alleges:

PARTIES AND CHARGING AUTHORITY

1. Erik Nasarenko, District Attorney for the County of Ventura, State of California, acting to protect the general public from unlawful, unfair or fraudulent business practices, brings this action in the public interest in the name of the People of the State of California pursuant to sections 17200, 17203, and 17206 of the Business and Professions Code, and pertinent sections of the Fish and Game Code and Water Code. Plaintiff, by this action, seeks to

1 enjoin defendants from engaging in the acts and practices alleged herein and seeks civil
2 penalties for defendants' violations of the above statutes.

3 2. Defendants have individually or through direction of others violated laws and
4 public policies of the State of California that would serve to protect the health, safety, rights
5 and interests of the general public as consumers, competitors and residents. Amongst
6 defendants, multiple properties were owned on and around the Wheeler Canyon Road area east
7 of Santa Paula, California. Defendants' actions at issue here include their wrongful conduct on
8 six of these properties, the properties described below as Properties 1, 2, 3, 4, 6, and 7.

9 3. Among their violations, defendants have engaged in construction and land
10 disturbance on these properties that have diverted and obstructed the natural flow of streams,
11 such as ephemeral streams, and affected surrounding habitats related to those properties.

12 4. Among their violations, defendants have engaged in construction and land
13 disturbance on these properties that have changed the bed, channel, or bank of streams, such as
14 ephemeral streams, and affected surrounding habitats related to those properties.

15 5. Among their violations, defendants have deposited or disposed of debris in
16 streams, such as ephemeral streams, and affected surrounding habitats related to these
17 properties.

18 6. Defendant GUADALUPE A. GUZMAN is an individual who owns the
19 following properties:

20 a. The property identified pursuant to AP number 062-0-070-065
21 ("PROPERTY 1");

22 b. The property identified pursuant to AP number 062-0-070-055
23 ("PROPERTY 2");

24 c. The property identified pursuant to AP number 064-0-070-025
25 ("PROPERTY 3"); and

26 d. The property identified pursuant to AP number 038-0-080-015
27 ("PROPERTY 4");

28 e. PROPERTIES 1-4 are sometimes identified separately or collectively as

1 the “Hampton Ranch” property or associated with addresses on Wheeler Canyon Road by Santa
2 Paula, California, such as (i) 3739 Wheeler Canyon Road, Santa Paula, or (ii) 4104 Wheeler
3 Canyon Road, Santa Paula.

4 7. Defendant GUADALUPE A. GUZMAN is the named owner on the deed that
5 includes PROPERTIES 1-4 and has owned these properties since on or about July 26, 2016.

6 8. Defendant LUPE AND CARMEN GUZMAN REVOCABLE FAMILY TRUST
7 DATED JULY 24, 2015 (“THE GUZMAN REVOCABLE TRUST”) is a trust that owns the
8 following properties:

9 a. The property identified pursuant to AP number 062-0-050-045
10 (“PROPERTY 6”); and

11 b. The property identified pursuant to AP number 062-0-050-055
12 (“PROPERTY 7”);

13 c. PROPERTIES 6 and 7 are sometimes identified separately or
14 collectively as the “Valestrino” property.

15 9. Defendant THE GUZMAN REVOCABLE TRUST is the owner of
16 PROPERTIES 6-7 and has owned these properties since on or about July 18, 2019.

17 10. Defendant SANTA PAULA HAY AND GRAIN AND RANCHES, LLC
18 (“SANTA PAULA HAY & GRAIN”) has been at all relevant times a California Limited
19 Liability Company, California entity number 201628410076, with a principal address in
20 Fillmore, California, in the County of Ventura.

21 11. Defendant SANTA PAULA HAY & GRAIN’s managers are responsible for
22 establishing the operational policies of SANTA PAULA HAY & GRAIN and manage, direct,
23 and participate in its operations, and directed or knowingly participated in or allowed the
24 unlawful acts or omissions alleged below, and failed to take action necessary to prevent those
25 acts and omissions despite having the authority to do so, and those managers include defendant
26 GUADALUPE A. GUZMAN and defendant YEISI B. GUZMAN.

27 12. SANTA PAULA HAY & GRAIN claims a legal and equitable interest in
28 PROPERTIES 1-4 and 6-7 and uses these properties in its business activities.

1 13. Defendants GUADALUPE A. GUZMAN, GUADALUPE J. GUZMAN,
2 OFELIA GUZMAN, and YEISI B. GUZMAN are individuals who are partners of SANTA
3 PAULA HAY & GRAIN and conducted business activities through SANTA PAULA HAY &
4 GRAIN. At all relevant times, defendants GUADALUPE A. GUZMAN, GUADALUPE J.
5 GUZMAN, OFELIA GUZMAN, and YEISI B. GUZMAN have not distinguished defendant
6 SANTA PAULA HAY & GRAIN's business activities from their own. These individual
7 defendants have treated personal and real property, which includes PROPERTIES 1-4 and 6-7,
8 without distinguishing its ownership and claim that SANTA PAULA HAY & GRAIN has a
9 legal and equitable interest in these properties.

10 14. At all relevant times hereto, defendants GUADALUPE A. GUZMAN,
11 GUADALUPE J. GUZMAN, OFELIA GUZMAN, and YEISI B. GUZMAN each were and
12 have been in a position of responsibility that allows them to influence the policies or activities
13 of SANTA PAULA HAY & GRAIN, each could have influenced any actions by SANTA
14 PAULA HAY & GRAIN that contributed to the legal violations alleged below, and each
15 directly participated in or knew and should have known of the unlawful acts or omissions of
16 SANTA PAULA HAY & GRAIN, but failed to take action necessary to prevent their
17 occurrence and these actions and inactions facilitated such violations. As such, defendants
18 GUADALUPE A. GUZMAN, GUADALUPE J. GUZMAN, OFELIA GUZMAN, and YEISI
19 B. GUZMAN are each personally liable for the acts of SANTA PAULA HAY & GRAIN, as
20 alleged herein.

21 15. The true names and capacities of defendants DOES 1 through 50, inclusive, are
22 currently unknown to plaintiff and therefore are being sued under such fictitious names.
23 Plaintiff will amend this complaint to allege the true names of DOES 1 through 50 as soon as
24 the same are known.

25 16. At all times relevant hereto, defendants, and each of them, were acting as the
26 agents of one another in doing the things herein alleged. Whenever reference is made in this
27 complaint to any act or omission by a defendant named herein, such allegation shall be deemed
28 to mean the act of each and every defendant acting individually, jointly and severally.

1 17. This Court has jurisdiction pursuant to Article 6, section 10 of the California
2 Constitution and Code of Civil Procedure sections 393, 410.10, and 395. Venue is proper in this
3 Court as the violations alleged in this complaint occurred in the County of Ventura, State of
4 California.

5 18. The Ventura County District Attorney and other government agencies have
6 entered into an agreement with defendants GUADALUPE A. GUZMAN and THE GUZMAN
7 REVOCABLE TRUST and affiliates and subsidiaries, to toll any applicable statutes of
8 limitation on claims that include those alleged in the causes of action below. As a result of this
9 agreement, the period between May 23, 2025, through and including May 23, 2026, will not be
10 included in (a) computing the time limited by any statute of limitations applicable to the causes
11 of action below; (b) determining whether any statute of limitations is applicable; or (c) support
12 of any equitable defense of laches, waiver, or similar alleged defense concerning timeliness of
13 commencing a civil action by the People.

14 19. SANTA PAULA HAY & GRAIN is presently involved in a Chapter 11
15 Bankruptcy proceeding, as the Debtor and Debtor-in-Possession. (See *In re Santa Paula Hay &*
16 *Grain and Ranches*, United States Bankruptcy Court, Central District of California, Northern
17 Division, Case No. 9:25-bk-10314-RC.) The People commence this action to enforce their
18 police and regulatory powers. The People's causes of action and instant action with respect to
19 SANTA PAULA HAY & GRAIN are not subject to the automatic stay in bankruptcy
20 proceedings pursuant to 11 U.S.C. § 362(b)(4). The People's causes of action and this instant
21 action with respect to SANTA PAULA HAY & GRAIN are not subject to removal pursuant to
22 28 U.S.C. § 1452(a) and *City & County of San Francisco v. PG & E Corp.* (9th Cir. 2006) 433
23 F.3d 1115.

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1 **FIRST CAUSE OF ACTION**

2 **Violations of Fish and Game Code section 1602**

3 **(Fish and Wildlife Protection and Conservation Laws)**

4 **Against All Defendants**

5 20. Plaintiff realleges and incorporates herein by this reference paragraphs 1 through
6 19, inclusive, as though set forth in full here.

7 21. Defendants are each a person as defined in Fish and Game Code section 67.

8 22. Defendants' conduct includes the following:

9 a. On PROPERTY 1, activities by defendants include pond construction,
10 grading of a stream, improper grading of surrounding areas, placement of fill, and vegetation
11 removal;

12 b. On PROPERTY 2, activities by defendants include dam construction,
13 grading of a stream, grading of surrounding areas, placement of fill, vegetation removal, and
14 danger of discharge;

15 c. On PROPERTY 3, activities by defendants include pond construction,
16 grading of a stream, grading of surrounding areas, and work and placement of foreign materials
17 and equipment next to the water area;

18 d. On PROPERTY 4, activities by defendants include pond construction,
19 grading of a stream, improper grading of surrounding areas, and placement of fill;

20 e. On PROPERTY 6, activities by defendants include pond construction,
21 grading near the stream and pond, and placement of foreign materials next to the stream and
22 pond; and

23 f. On PROPERTY 7, activities by defendants include pond construction,
24 grading of a stream, grading of surrounding areas, placement of fill, and vegetation removal.

25 23. Defendants did not provide the Department of Fish and Wildlife with written
26 notification of the activities described above or any of them in the manner prescribed by the
27 Department of Fish and Wildlife. At no time did the Department of Fish and Wildlife determine
28

1 that any notification of these activities was complete pursuant to Government Code section
2 65920 et seq. Nor did defendants pay requisite fees.

3 24. Current conditions on PROPERTIES 1-4 and 6-7 include remaining construction
4 and land disturbance that continue to divert and obstruct the natural flow of streams related to
5 those properties, such as ephemeral streams; construction and land disturbance that continue to
6 change the bed, channel, or bank of streams related to those properties, including ephemeral
7 streams; and other conduct affecting surrounding environs, such as deposits of debris and
8 disposed debris in and around those streams.

9 25. Defendants GUADALUPE A. GUZMAN and THE GUZMAN REVOCABLE
10 TRUST and each of them did these acts since May 23, 2025, and three (3) years prior thereto.

11 26. Defendants GUADALUPE J. GUZMAN, OFELIA GUZMAN, and YEISI B.
12 GUZMAN, SANTA PAULA HAY & GRAIN, and DOES 1-50 and each of them did these acts
13 within the past three (3) years.

14 **SECOND CAUSE OF ACTION**

15 **Violations of Fish and Game Code section 5650.1**

16 **(Pollution Laws)**

17 **Against All Defendants**

18 27. Plaintiff realleges and incorporates herein by this reference paragraphs 1 through
19 24, inclusive, as though set forth in full here.

20 28. The violation of law alleged in the second cause of action is a strict-liability
21 public welfare and regulatory offense.

22 29. Through activities that include grading, placement of fill, blockage to create
23 ponds, and placement of foreign materials, defendants have deposited, permitted to pass into,
24 and placed where it can pass into streams related to PROPERTIES 1-4 and 6-7, including
25 ephemeral streams, substances and materials deleterious to fish, plant life, mammals or bird
26 life.

27 30. Defendants GUADALUPE A. GUZMAN and THE GUZMAN REVOCABLE
28 TRUST and each of them did these acts since May 23, 2025, and three (3) years prior thereto.

1 31. Defendants GUADALUPE J. GUZMAN, OFELIA GUZMAN, and YEISI B.
2 GUZMAN, SANTA PAULA HAY & GRAIN, and DOES 1-50 and each of them did these acts
3 within the past three (3) years.

4 **THIRD CAUSE OF ACTION**

5 **Violations of Business and Professions Code section 17200**

6 **(Unfair Competition Law)**

7 **Against All Defendants**

8 32. Plaintiff realleges and incorporates herein by this reference paragraphs 1 through
9 24, and paragraph 29, inclusive, as though set forth in full here.

10 33. At all relevant times, defendants have negatively affected streams, including
11 ephemeral streams, and their environs on PROPERTIES 1-4 and 6-7 in ways that repeatedly
12 violate the laws of California, in a manner that includes the following examples of violations of
13 law:

14 a. Diversion and obstruction of the natural flow of streams, including
15 ephemeral streams, related to those properties, in violation of Fish and Game Code section
16 1602;

17 b. Construction and land disturbance acts that have changed the bed,
18 channel, or bank of streams, including ephemeral streams, related to those properties, in
19 violation of Fish and Game Code section 1602;

20 c. Depositing and disposing of debris in streams, including ephemeral
21 streams, related to those properties, in violation of Fish and Game Code section 1602; and

22 d. Depositing, permitting to pass into, or placing where it can pass into
23 streams, including ephemeral streams, related to these properties, substances and materials
24 deleterious to fish, plant life, mammals or bird life, in violation of Fish and Game Code section
25 5650.

26 34. Defendants GUADALUPE A. GUZMAN and THE GUZMAN REVOCABLE
27 TRUST and each of them did these acts since May 23, 2025, and four (4) years prior thereto.

1 35. Defendants GUADALUPE J. GUZMAN, OFELIA GUZMAN, and YEISI B.
2 GUZMAN, SANTA PAULA HAY & GRAIN, and DOES 1-50 and each of them did these acts
3 within the past four (4) years.

4 36. These acts were done for business purposes involving commercial ranching and
5 farming and defendants and each of them had responsibility for the acts alleged.

6 37. Unless enjoined by order of the Court, defendants will continue to engage in
7 unlawful practices as alleged herein.

8 38. The unlawful conduct, acts and omissions of defendants in violation of section
9 17200 of the Business and Professions Code, as set forth herein, demonstrate the necessity and
10 legal basis for granting injunctive relief and imposing civil penalties pursuant to sections 17203
11 and 17206 of the Business and Professions Code.

12 39. Unless enjoined by order of the Court, defendants may or will continue in the
13 course of conduct as alleged herein.

14 40. The People bring this action under California's Unfair Competition Law so that
15 the Court can protect the residents, environment, and economy of Ventura County, once and for
16 all. The People also demand civil penalties not to exceed \$25,000 for each violation of the
17 protection and conservation laws occurring on the property, pursuant to Fish and Game Code
18 sections 1615 and 5650.1. The People also seek a civil penalty not to exceed \$2,500 for each
19 separate act in violation of Business and Professions Code section 17206, the maximum amount
20 authorized under the Unfair Competition Law. In assessing the amount of any civil penalty, the
21 Court is required by statute to consider the relevant circumstances, including, but not limited to,
22 the following:

- 23 a. Nature and seriousness of the misconduct;
- 24 b. Number of violations;
- 25 c. Persistence of the misconduct;
- 26 d. Length of time over which the misconduct occurred; and
- 27 e. Assets, liabilities, and net worth of defendants.

1 These civil penalties are to be dedicated and used for the enforcement of consumer protection
2 laws and will be dedicated and used for the benefit of the residents of Ventura County.

3 **PRAYER**

4 WHEREFORE, Plaintiff prays judgment as follows:

5 1. That, pursuant to section 1615 of the Fish and Game Code, defendants, their
6 successors and assigns, and all persons, corporations or other entities acting under, by, through
7 or on behalf thereof, or acting in concert or participation with or for defendants, be
8 preliminarily and thereafter permanently restrained and enjoined from violating section 1602 of
9 the Fish and Game Code.

10 2. That, pursuant to section 1615 of the Fish and Game Code, each defendant be
11 ordered to pay a civil penalty in the amount of Twenty-Five Thousand Dollars (\$25,000) for
12 each violation.

13 3. That, pursuant to section 5650.1 of the Fish and Game Code, defendants, their
14 successors and assigns, and all persons, corporations or other entities acting under, by, through
15 or on behalf thereof, or acting in concert or participation with or for defendants, be
16 preliminarily and thereafter permanently restrained and enjoined from violating section 5650 of
17 the Fish and Game Code.

18 4. That, pursuant to section 5650.1 of the Fish and Game Code, each defendant be
19 ordered to pay a civil penalty in the amount of Twenty-Five Thousand Dollars (\$25,000) for
20 each violation. Such penalties shall be apportioned pursuant to section 5650.1(h).

21 5. That, pursuant to section 12016 of the Fish and Game Code, each defendant be
22 ordered to pay for all actual damages to fish, plant, bird, or animal life or their habitat and, in
23 addition, for the reasonable costs incurred in cleaning up deleterious substances and materials
24 and abating their effects.

25 6. That, pursuant to section 17203 of the Business and Professions Code, and the
26 Court's inherent equity powers, defendants, their successors and assigns, and all persons,
27 corporations or other entities acting under, by, through or on behalf thereof, or acting in concert
28 or participation with or for it, be preliminarily and thereafter permanently restrained and

1 enjoined from violating Business and Professions Code section 17200, as more specifically
2 alleged hereinabove;

3 7. That, pursuant to section 17206 of the Business and Professions Code,
4 defendants be ordered to pay a civil penalty in the amount of Two Thousand Five Hundred
5 Dollars (\$2,500) for each violation of section 17200 of the Business and Professions Code as
6 alleged herein, according to proof at trial;

7 8. That plaintiff have such other and further relief as the nature of the case may
8 require and the court finds appropriate to dissipate the effects of the unlawful acts complained
9 of herein;

10 9. That defendants pay restitution to all government agencies that have expended
11 resources in responding to, and investigating, defendants' violations of law as alleged herein;
12 and

13 10. That plaintiff recover all costs incurred in this action.

14
15 Respectfully submitted,

16 ERIK NASARENKO, District Attorney
17 County of Ventura, State of California

18
19 DATED: May 5, 2026

By Edward A. Andrews

EDWARD A. ANDREWS
Senior Deputy District Attorney