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BY _____ DEPUTY

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7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF STANISLAUS

9 **THE PEOPLE OF THE STATE OF CALIFORNIA**

10 Plaintiff,

11 vs.

12 **VINTAGE CAR WASH, INC.**

13 Defendant.
14

CASE NO. **375580**

STIPULATED JUDGMENT FOR
INJUNCTION, CIVIL PENALTIES,
AND OTHER RELIEF

15 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, having filed their
16 complaint herein, CAROL SHIPLEY, Assistant District Attorney of Stanislaus County, by
17 and through GLORIA M. MAS, Deputy District Attorney of Stanislaus County, and
18 defendant VINTAGE CAR WASH, INC. hereby stipulate and consent to the entry of the
19 Permanent Injunction and Final Judgment Pursuant to Stipulation. By signing this
20 stipulation, this named defendant hereby admits the allegations of the complaint. This
21 stipulation is entered into based in part on representations made and reaffirmed by this
22 named defendant herein that certain penalty payments will be made according to the terms
23 of the Stipulated Final Judgment. This Stipulated Final Judgment shall constitute evidence
24 of admission or concession by this named defendant regarding all allegations of law and fact
25 alleged in the complaint on file herein.

26 Upon the consent of the parties hereto, and it appearing to the court that there is
27 good cause for the entry of this Stipulated Final Judgment,
28

STIPULATED JUDGMENT FOR
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OTHER RELIEF

1 IT IS ORDERED, ADJUDGED AND DECREED as follows:

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

4 2. The injunctive provisions of this Final Judgment are applicable to defendants, its
5 subsidiaries and divisions, and any agent, employee, representative and all persons, partners,
6 corporations, or other entities acting by, through, under, or on behalf of defendants and all persons
7 in concert with or participating with said defendants with actual or constructive knowledge of this
8 injunction, only insofar as they are doing business in the State of California and confined to
9 defendants' business operations in the County of STANISLAUS and throughout the state of
10 California.

11
12 3. Pursuant to Business and Practice Code §17203, Defendants are hereby permanently
13 enjoined from:

14 a) Violating any environmental offenses, including but not limited to §25299 of the
15 Health and Safety Code.

16
17
18 4. Defendants shall pay the sum of TWO THOUSAND FIVE HUNDRED
19 DOLLARS (\$2,500.00) in civil penalties to be paid as follows:

20
21 a) Defendants shall pay TWO THOUSAND FIVE HUNDRED DOLLARS
22 (\$2,500.00), as civil penalties, including partial cost recovery, pursuant to Health and
23 Safety Code § 25299. This civil penalty amount shall be made payable to the Stanislaus
24 County Treasurer Department of Environmental Resources.

25 These penalties shall be **STAYED** for a period of three (3) years, beginning the filing
26 of this Stipulated Judgment, on the condition that no violations occur pursuant to this
27 agreement. It is understood that this stayed \$2,500.00 portion of the civil penalty shall
28 immediately be due and owed on this case if any future violations occur. If no violations

STIPULATED JUDGMENT FOR
INJUNCTION, CIVIL PENALTIES, AND
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1 occur during the three-year period, the stay will become permanent.

2
3 5. In addition, defendants shall pay the sum of SIX THOUSAND NINE HUNDRED
4 NINETEEN DOLLARS AND SEVENTY CENTS (\$ 6,919.70) to a Supplemental
5 Environmental Program, and/or Recovery Costs, as follows:
6

7 a) Defendant shall pay the sum of ONE THOUSAND NINE HUNDRED
8 NINETEEN DOLLARS AND SEVENTY CENTS DOLLARS (\$1,919.70), payable to
9 the Secretary of the California Environmental Protection Agency. This money shall be
10 deposited into the Environmental Enforcement and Training Account established by
11 Assembly Bill 2486 (2002, Keeley) under the authority of Penal Code § 14301.
12

13 b) Defendant shall pay the sum of TWO THOUSAND FIVE HUNDRED
14 DOLLARS (\$2,500.00), payable to the Stanislaus County Department of Environmental
15 Resources. Such money is to be used for environmental offenses to conduct investigation,
16 prosecution and remediation.
17

18 c) Defendant shall pay the sum of TWO THOUSAND FIVE HUNDRED
19 DOLLARS (\$2,500.00), payable to the California State Water Resources Control Board
20 State Water and Pollution Cleanup and Abatement Account.
21

22
23 6. Defendant shall pay the sum of FIVE HUNDRED EIGHTY DOLLARS AND
24 THIRTY CENTS (\$580.30) payable to the Stanislaus County Superior Court for filing fees.

25
26 7. Defendants waive all objections to, employees from the CSWRCB and the
27 Department of Environmental Resources, entering upon their business operations in Stanislaus,
28 CA, for the purpose of inspection and enforcement of the terms of this agreement.

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INJUNCTION, CIVIL PENALTIES, AND
OTHER RELIEF

