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**EXEMPT FROM FILING FEES
PURSUANT TO GOVERNMENT
CODE SECTION 6103**

9 Attorneys for Plaintiffs
CITY AND COUNTY OF SAN FRANCISCO and
10 PEOPLE OF THE STATE OF CALIFORNIA

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF SAN FRANCISCO

13 UNLIMITED JURISDICTION

14 CITY AND COUNTY OF SAN
15 FRANCISCO, a Municipal Corporation; and
the PEOPLE OF THE STATE OF
16 CALIFORNIA, by and through David Chiu,
City Attorney for the City and County of San
17 Francisco,

18 Plaintiffs,

19 vs.

20 THE ALLEN HOTEL, LLC, a California
limited liability company; KAREN TRINH, an
21 individual; DISCOUNT MARKEET 2 INC
dba "CORNER STORE", a California stock
22 corporation; ABDULRAHMAN
ALMEHDHAR, an individual; MUSTAFA
23 MEHDAR ALMEHDHAR, an individual; and
DOE 1 through DOE 5,

24 Defendants.
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Case No. CGC-

**COMPLAINT FOR INJUNCTIVE AND
OTHER RELIEF**

**(1) VIOLATION OF THE UNIFORM
CONTROLLED SUBSTANCES ACT (CAL
HEALTH AND SAFETY CODE §§ 11570-11587;
CAL CIVIL CODE §§ 3479, 3480, 3491, and
3494)**

**(2) VIOLATION OF THE UNFAIR
COMPETITION LAW (CAL. BUSINESS AND
PROFESSIONS CODE §§ 17200-17210)**

**(3) VIOLATION OF THE SAN FRANCISCO
HEALTH CODE**

**(4) PUBLIC NUISANCE (CAL HEALTH AND
SAFETY CODE §§ 11570-11587; CAL CIVIL
CODE §§ 3479, 3480, 3491, and 3494)**

Type of Case: (42) Other Complaint

1 The CITY AND COUNTY OF SAN FRANCISCO, a Municipal Corporation (“CITY”), and
2 the PEOPLE OF THE STATE OF CALIFORNIA, by and through DAVID CHIU, City Attorney for
3 the City and County of San Francisco (“PEOPLE”), (collectively, “PLAINTIFFS”), file their
4 COMPLAINT against Defendants THE ALLEN HOTEL, LLC, a California limited liability company;
5 KAREN TRINH, an individual; DISCOUNT MARKEET 2 INC dba “CORNER STORE,” a
6 California stock corporation; ABDULRAHMAN ALMEHDHAR, an individual; MUSTAFA
7 MEHDAR ALMEHDHAR, an individual; and DOE 1 through DOE 5 (collectively,
8 “DEFENDANTS”). PLAINTIFFS hereby allege as set forth below:

9 INTRODUCTION

10 1. Since DEFENDANTS have been in business, residents of the Tenderloin neighborhood
11 have suffered due to the illegal acts and business practices at their property located at 401 Eddy Street,
12 parcel 337, lot 001, at the intersection of Eddy St. and Leavenworth St. in San Francisco, California
13 (the “PROPERTY”). DEFENDANTS DISCOUNT MARKEET 2 INC dba “CORNER STORE,”
14 ABDULRAHMAN ALMEHDHAR, and MUSTAFA MEHDAR ALMEHDHAR operate a business
15 known as CORNER STORE at the PROPERTY that contributes to criminal activity in the Tenderloin.
16 This action seeks to put an end to that activity.

17 2. DEFENDANTS THE ALLEN HOTEL, LLC and KAREN TRINH have owned the
18 PROPERTY since at least 2005. On information and belief, DEFENDANTS THE ALLEN HOTEL,
19 LLC and KAREN TRINH leased the PROPERTY to DEFENDANTS DISCOUNT MARKEET 2 INC
20 and ABDULRAHMAN ALMEHDHAR on or about April 2023.

21 3. DEFENDANT ABDULRAHMAN ALMEHDHAR is the manager and operator of
22 DEFENDANT DISCOUNT MARKEET 2 INC, which has owned CORNER STORE since at least
23 February 2023.

24 4. DEFENDANT MUSTAFA MEHDAR ALMEHDHAR has managed and/or operated
25 CORNER STORE since at least April 2023.

26 5. Due to the sale of methamphetamine, marijuana, illegal tobacco, and drug
27 paraphernalia occurring at CORNER STORE, the PROPERTY has attracted criminal and nuisance
28 activity to the surrounding community, necessitating police intervention and adversely affecting the

1 neighborhood and the health, safety, and well-being of those who live and work in the area, as well as
2 the general public.

3 6. By allowing illegal sale of controlled substances to occur at CORNER STORE,
4 DEFENDANTS have maintained the PROPERTY as a nuisance in violation of Health and Safety
5 Code sections 11570-11587 (“Drug Abatement Law”).

6 7. DEFENDANTS, by allowing illegal sales of tobacco products without a permit, and
7 sales of illegal flavored tobacco/nicotine products and electronic cigarettes (“e-cigarettes”), have
8 maintained the PROPERTY as a *per se* public nuisance, in violation of state and local law. California
9 Health & Safety Code section 104559.5 prohibits the sale of flavored tobacco products. San Francisco
10 Health Code sections 19S, 19Q.3, and 19Q.4 further restrict the sale of flavored tobacco products.
11 Health Code section 19R.2 prohibits the sale of electronic cigarettes lacking United States Food and
12 Drug Administration (“FDA”) premarket approval.

13 8. In addition to the drug sales and sale of illegal tobacco products at CORNER STORE,
14 DEFENDANTS contribute to the problems on the 400 block of Eddy Street and in the surrounding
15 neighborhood by maintaining a safe haven at CORNER STORE for drug dealers and users.
16 DEFENDANTS sell drug paraphernalia at CORNER STORE and allow the sales, storage and
17 possession of controlled substances at CORNER STORE. Drug dealers routinely loiter inside and in
18 front of CORNER STORE, attracting large groups of drug users to this area. This activity is
19 disruptive, necessitating police intervention and adversely affecting the neighborhood and the health,
20 safety, and well-being of those who live and work in the area, as well as the general public.

21 9. By operating, and/or allowing the operation of, CORNER STORE in repeated violation
22 of applicable state and local laws and as a nuisance, DEFENDANTS have engaged in unlawful
23 business practices in violation of the Unfair Competition Law (“UCL”), California Business and
24 Professions Code sections 17200-17210.

25 **PARTIES AND SUBJECT PROPERTY**

26 10. PLAINTIFF City and County of San Francisco (“CITY”) is a consolidated charter city
27 and county under the laws of the State of California. The CITY brings this action under the San
28

1 Francisco Municipal Codes, including the San Francisco Health Code, and California Civil Code
2 section 3494.

3 11. PLAINTIFF People of the State of California, by and through San Francisco City
4 Attorney David Chiu (“PEOPLE”), brings this action under Code of Civil Procedure Section 731 and
5 Business and Professions Code Section 17204.

6 12. DEFENDANT THE ALLEN HOTEL, LLC is a California limited liability company
7 and owns the PROPERTY.

8 13. DEFENDANT KAREN TRINH, an individual, is the manager and agent for
9 DEFENDANT THE ALLEN HOTEL, LLC and is domiciled in Millbrae, California.

10 14. DEFENDANTS THE ALLEN HOTEL, LLC and KAREN TRINH leased the
11 PROPERTY to DEFENDANT DISCOUNT MARKEET 2 INC.

12 15. DEFENDANT DISCOUNT MARKEET 2 INC is a California stock corporation and
13 leases the PROPERTY.

14 16. DEFENDANT ABDULRAHMAN ALMEHDHAR, an individual, is the manager of
15 DEFENDANT DISCOUNT MARKEET 2 INC and is domiciled in San Francisco, California.
16 ABDULRAHMAN ALMEHDHAR owns, manages and/or operates CORNER STORE. CORNER
17 STORE is a business where patrons can purchase contraband, including methamphetamine, marijuana,
18 illegal tobacco, and drug paraphernalia. Actions taken, or omissions made by ABDULRAHMAN
19 ALMEHDHAR’s employees or agents in the course of their employment or agency at CORNER
20 STORE, are considered to be actions or omissions of ABDULRAHMAN ALMEHDHAR for the
21 purposes of this Complaint.

22 17. DEFENDANT MUSTAFA MEHDAR ALMEHDHAR is the individual who manages
23 and/or operates CORNER STORE. DEFENDANT MUSTAFA MEHDAR ALMEHDHAR is
24 domiciled in San Francisco, California. CORNER STORE is a business where patrons can purchase
25 contraband, including methamphetamine, marijuana, illegal tobacco, and drug paraphernalia. Actions
26 taken, or omissions made, by MUSTAFA MEHDAR ALMEHDHAR’s employees or agents in the
27 course of their employment or agency at CORNER STORE are considered to be actions or omissions
28 of MUSTAFA MEHDAR ALMEHDHAR for the purposes of this Complaint.

1 18. Defendants DOE 1 through DOE 5 are sued herein under fictitious names. Plaintiffs do
2 not at this time know the true names or capacities of said defendants but pray that the same may be
3 alleged herein when ascertained.

4 **GENERAL ALLEGATIONS**

5 19. CORNER STORE is a commercial business located on a busy commercial street in the
6 Tenderloin district of San Francisco. DEFENDANT DISCOUNT MARKEET 2 INC does business as
7 CORNER STORE, which has been in operation since at least February 2023. DEFENDANTS
8 ABDULRAHMAN ALMEHDHAR and MUSTAFA MEHDAR ALMEHDHAR have owned,
9 managed and/or operated DEFENDANT DISCOUNT MARKEET 2 INC, doing business as
10 CORNER STORE, since at least February 2023. DEFENDANTS DISCOUNT MARKEET 2 INC,
11 ABDULRAHMAN ALMEHDHAR, and MUSTAFA MEHDAR ALMEHDHAR lease the
12 commercial space at the PROPERTY from DEFENDANTS THE ALLEN HOTEL, LLC and KAREN
13 TRINH.

14 20. Retail establishments are required to obtain a permit from the CITY in order to sell
15 tobacco products. CORNER STORE did not have a permit to sell tobacco of any form from the CITY
16 during all relevant times alleged herein.

17 21. Beginning in 2024, the CITY's Department of Public Health ("DPH") began receiving
18 complaints of unpermitted tobacco sales at CORNER STORE. In response, DPH conducted an
19 undercover operation at CORNER STORE to purchase tobacco products. An undercover DPH
20 inspector entered CORNER STORE and asked two store clerks whether they had Geek Bar products
21 to sell. Geek Bar is a company that sells illegal tobacco products. One of the CORNER STORE clerks
22 told the investigator that CORNER STORE did not carry Geek Bar products, but indicated they had
23 other flavored nicotine products. A shelf behind the counter contained tobacco products that are illegal
24 to sell in the CITY. The investigator purchased a POD Mesh Chilled Blue Razz vape styled flavored
25 tobacco product and left the store. This product does not have FDA approval and is not legal to sell in
26 the United States.

27 22. DPH issued DEFENDANTS a Notice of Violation ("NOV") on April 3, 2024,
28 requiring them to immediately discontinue the illegal sale and distribution of all tobacco products and

1 obtain a DPH tobacco permit. DPH issued DEFENDANTS a Notice of Correction on May 21, 2024,
2 requiring them to discontinue the illegal sales and distribution of tobacco products by June 6, 2024.

3 23. Members of the San Francisco Police Department (SFPD), California Department of
4 Tax and Fee Administration (CDTFA), and California Department of Public Health (DPH), conducted
5 an of CORNER STORE on November 4, 2025. The investigating team seized the following items:
6 48.1 grams of methamphetamine, 4.68 pounds of marijuana, a green polymer 80 “ghost gun” handgun,
7 and dozens of illegal tobacco products.

8 24. From the display cases, which were located in an area accessible to minors, the officers
9 seized hundreds of glass pipes used for ingesting illegal narcotics as well as small plastic baggies
10 commonly used to package narcotics for sale. The store also sold digital scales.

11 25. Since CORNER STORE opened, criminal and nuisance activity have increased in the
12 area, necessitating police intervention and adversely affecting the surrounding neighborhood. The
13 neighborhood has experienced a rising number of thefts, assaults, drug-related offenses and arrests of
14 CORNER STORE employees wanted on outstanding warrants and other offenses. DEFENDANTS’
15 maintenance of CORNER STORE has interfered with the comfortable enjoyment of life and property
16 in the surrounding community. Its continued operation is a nuisance that threatens the health and
17 safety of the neighborhood and the well-being of those who live and work in the area, as well as the
18 general public.

19 **FIRST CAUSE OF ACTION**

20 **BROUGHT BY PLAINTIFFS PEOPLE OF THE STATE OF CALIFORNIA AND THE CITY**
21 **AND COUNTY OF SAN FRANCISCO AGAINST ALL DEFENDANTS FOR VIOLATIONS**
22 **OF THE UNIFORM CONTROLLED SUBSTANCES ACT**

23 **(Health And Safety Code Sections 11570 -11587)**

24 26. Plaintiffs People of the State of California and the City and County of San Francisco
25 hereby incorporate by reference paragraphs 1 through 24 above, as though fully set forth herein.

26 27. DEFENDANTS and their employees and agents have sold, stored, or possessed
27 controlled substances at CORNER STORE and/or permitted the sale, storage, possession,
28 manufacture, consumption or distribution of controlled substances at CORNER STORE. Such
conduct constitutes a nuisance as a matter of law pursuant to California Health and Safety Code

1 section 11570.

2 28. Pursuant to California Health and Safety Code Section 11581, Plaintiffs request that the
3 Court close CORNER STORE for one year and impose civil penalties of \$25,000.00 against each
4 DEFENDANT to prevent DEFENDANTS from continuing to maintain a nuisance at CORNER
5 STORE .

6 29. Unless said nuisance is abated, the residents and citizens of the City and County of San
7 Francisco and the People of California will suffer irreparable injury and damage, in that said
8 conditions will continue to be dangerous to the life, safety or health of those who live and work near
9 CORNER STORE and the general public.

10 30. Plaintiffs have no adequate remedy at law in that damages alone are insufficient to
11 protect the public from the present injury and harm caused by the conduct described above.

12 **SECOND CAUSE OF ACTION**

13 **BY PLAINTIFF PEOPLE AGAINST ALL DEFENDANTS FOR UNFAIR AND UNLAWFUL**
14 **BUSINESS PRACTICES**
15 **(CA Business & Prof. Code §§ 17200 -17210)**

16 31. PLAINTIFF PEOPLE hereby incorporate by reference paragraphs 1 through 52 above,
17 as though fully set forth herein.

18 32. PLAINTIFF PEOPLE is acting to protect the public from unlawful, unfair, and
19 fraudulent business practices, and brings this cause of action in the name of the People of the State of
20 California, pursuant to Business & Professions Code Sections 17200 – 17210 (the “UCL”).

21 33. The violations of law described herein were carried out within the City and County of
22 San Francisco, State of California.

23 34. As described above, DEFENDANTS engaged in unlawful and unfair business practices
24 at CORNER STORE in San Francisco, including but not limited to the following:

25 • Violating Health and Safety Code sections 11570 -11587 by permitting the sale,
26 storage, possession, manufacture, consumption or distribution of controlled substances at CORNER
27 STORE;

28 • Violating Health and Safety Code section 11364.5 by unlawfully keeping and selling
drug paraphernalia in an area accessible to minors;

- 1 • Violating Health and Safety Code section 11364.7 by delivering, furnishing,
2 transferring, and possessing with intent to deliver, furnish or transfer drug paraphernalia, knowing or
3 under circumstances where one reasonably should know that it will be used to ingest, inhale or
4 otherwise introduce into the human body a controlled substance;
- 5 • Violating Section 19H.3 of the Health Code by selling tobacco products without a valid
6 DPH permit;
- 7 • Violating Section 19S of the Health Code by selling flavored tobacco products and by
8 selling e-cigarettes lacking FDA Premarket Order of Approval;
- 9 • Violating Section 19Q.3 of the Health Code by selling flavored tobacco products;
- 10 • Violating Section 19Q.4 of the Health Code by selling flavored cigarettes;
- 11 • Violating Section 19R.2 of the Health Code by selling e-cigarettes lacking FDA
12 Premarket Order of Approval;
- 13 • Violating section 104559.5 of the California Health & Safety Code by selling flavored
14 tobacco products;
- 15 • Violating Section 19H.17 of the Health Code by selling tobacco without a permit.
- 16 • DEFENDANTS have been unfairly competing by not complying with San Francisco’s
17 tobacco and cannabis permitting requirements, as law-abiding businesses do.
- 18 • DEFENDANTS have been unfairly competing by selling tobacco products without a
19 permit, and are therefore unfairly competing with their law-abiding competitors.
- 20 • DEFENDANTS have been unfairly competing by selling flavored tobacco products
21 that cannot be sold legally, and are therefore unavailable to their law-abiding competitors.
- 22 • DEFENDANTS have been unfairly competing by selling e-cigarettes lacking a Food
23 and Drug Administration Premarket Order of Approval, which cannot be sold legally, and are
24 therefore unavailable to their law-abiding competitors.
- 25 • DEFENDANTS have acted unfairly and harmed consumers by illegally selling flavored
26 tobacco products and e-cigarettes to them. Unless the People of the State of California are granted the
27 remedies sought below, including injunctive relief, DEFENDANTS will continue to cause injury and
28 irreparable harm to consumers and the general public.

1 **Injunctive Relief**

2 5. All movable property used in the maintenance of the nuisance at CORNER STORE be
3 removed and sold, pursuant to Penal Code section 11230;

4 6. CORNER STORE be closed for one year, pursuant to Penal Code section 11230;

5 7. CORNER STORE be closed for one year, pursuant to Health & Safety Code section
6 11581(b)(1);

7 8. In the event the Court decides that any vacancy resulting from closure will be harmful
8 to the community, in lieu of closing CORNER STORE, each Defendant be ordered to pay damages in
9 an amount equal to the fair market rental value of the commercial space occupied by CORNER
10 STORE for one year, pursuant to Penal Code section 11230 and pursuant to Health & Safety Code
11 section 11581(c)(1);

12 9. In the event that the Court does not order CORNER STORE closed, all
13 DEFENDANTS, their agents, officers, lessees, managers, representatives, employees, and anyone
14 acting on their behalf, and their heirs and assignees be preliminarily and permanently enjoined from
15 operating, conducting, using, occupying, or in any way permitting the use of CORNER STORE as a
16 nuisance pursuant to California Health and Safety Code sections 11570-1158.

17 10. DEFENDANTS be enjoined and restrained from occupying or operating, and/or
18 allowing the occupation or operation of CORNER STORE while the conditions described in this
19 Complaint exist and until all of the violations at CORNER STORE have been abated;

20 11. DEFENDANTS be ordered to cause CORNER STORE to conform to law, and
21 maintain such structures and all parts thereof in accordance with law;

22 12. Pursuant to California Business and Professions Code sections 17203-17204,
23 DEFENDANTS, their agents, officers, lessees, managers, representatives, employees, and anyone
24 acting on their behalf, and their heirs, successors, and assignees be enjoined from operating,
25 conducting, using, occupying, or in any way permitting the use of CORNER STORE in the unlawful
26 and unfair business practices described in this Complaint;

1 13. DEFENDANTS, and each of them, inclusive, be enjoined from spending, transferring,
2 encumbering, or removing from California any money received from CORNER STORE or in payment
3 for the unlawful acts alleged in the Complaint;

4 **Penalties**

5 14. The Court impose civil penalties of up to \$25,000.00 against each Defendant to prevent
6 them from continuing to maintain, and/or to allow the maintenance of, a nuisance at CORNER
7 STORE, pursuant to Penal Code section 11230;

8 15. The Court impose civil penalties of up to \$25,000.00 against each Defendant to prevent
9 them from continuing to maintain, and/or to allow the maintenance of, a nuisance at CORNER
10 STORE, pursuant to Health & Safety Code section 11581(b)(2);

11 16. DEFENDANTS be ordered to each pay a civil penalty of up to \$2,500.00 for each act
12 of unlawful competition, pursuant to Business and Professions Code section 17206;

13 17. Pursuant to San Francisco Health Code section 600(b), DEFENDANTS be ordered to a
14 civil penalty of \$1,000 for each day that the Health Code violations alleged in the Complaint existed or
15 were permitted to occur plus \$1,000 per day thereafter that the violations continue to occur through
16 entry of judgment, or a greater amount as may be shown by the evidence for violations of Health Code
17 sections 581(b).

18 **Fees and Costs**

19 18. DEFENDANTS be ordered to pay PLAINTIFFS ' reasonable attorney's fees and costs,
20 including the cost of investigation and discovery, pursuant to Civil Code sections 3496(b) and 3496(c).

21 19. PLAINTIFFS be awarded their costs incurred herein pursuant to Code of Civil
22 Procedure section 1032; and

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1 20. The Court grant such other and further relief as this Court should find just and proper.

2 21. Other and further relief be ordered as this Court should find just and proper.

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5 Dated: May 6, 2026

6 DAVID CHIU
7 City Attorney
8 YVONNE R. MERÉ
9 Chief Deputy City Attorney
10 WADE CHOW
11 Chief Attorney
12 Code Enforcement Team
13 HUNTER W. SIMS III
14 Deputy City Attorney

15 By: /s/ Hunter W. Sims III
16 HUNTER W. SIMS III

17 Attorneys for Plaintiffs
18 CITY AND COUNTY OF SAN FRANCISCO and
19 PEOPLE OF THE STATE OF CALIFORNIA
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