



533 Airport Blvd Suite 400,
Burlingame CA 94010
(415) 843-1LAW[1529]

March 26, 2025

VIA CERTIFIED MAIL & EMAIL

Sarah Ho & Chungjen Ho
happyearth2012@gmail.com
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1678 HARRISON STREET Apt A
Santa Clara CA 95050

Subject: Demand for Return of Security Deposit and Relocation Assistance – Khuddush Abdul

Dear Ms. Ho and Mr. Ho,

Our firm represents **Khuddush Abdul**, your former tenant at **1678 Harrison Street, Unit A, Santa Clara, CA 95050**. This letter serves as a formal demand for the following:

- 1. Full return of Mr. Abdul's \$2,250 security deposit**
- 2. Relocation assistance in the amount of \$2,250 under Civil Code § 1946.2**
- 3. Statutory damages for bad faith retention of the deposit and retaliatory conduct, pursuant to Civil Code §§ 1950.5(l) and 1942.5**

Background

Mr. Abdul vacated the premises on **January 31, 2025**, returned the keys promptly, and left the unit clean and undamaged. He took **time-stamped photographs** at move-out showing no floor damage or unclean conditions. Your **itemized deduction letter dated February 5, 2025**, claimed over \$2,400 in repairs — none of which were supported by receipts or previously disclosed — and only followed our request to dismiss the wrongful eviction case.



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Legal Violations

1. Bad Faith Retention of Security Deposit (Civil Code § 1950.5(l))

California law requires deductions to be reasonable and documented. The absence of credible evidence or repair documentation suggests **bad faith**, entitling our client to:

- Return of the \$2,250 deposit
- **Statutory damages up to twice that amount (\$4,500)**

2. Retaliatory Conduct (Civil Code § 1942.5)

The sudden deductions and prior filing of a baseless eviction constitute **retaliation** for Mr. Abdul exercising his legal rights. Civil Code § 1942.5 prohibits this and allows for **civil penalties of up to \$2,000** per act.

Violation of Tenant Protection Act (AB 1482) – Failure to Provide Required Relocation Assistance (Civil Code § 1946.2(d))

You issued **multiple retaliatory Notices of Termination**, some of which appear to violate the **Tenant Protection Act of 2019 (AB 1482)** by lacking a valid just cause basis under **Civil Code § 1946.2**. These notices closely followed Mr. Abdul's lawful requests for repairs due to worsening habitability conditions, including persistent mold and rodent issues.

Most notably, your **Notice of Termination dated November 27, 2024**, was served under the pretense of "substantial renovation," a no-fault just cause under AB 1482. Mr. Abdul, in good faith and in the interest of resolving the conflict, agreed to vacate the premises peacefully. However, **you failed to pay the legally required relocation assistance** as mandated under **Civil Code § 1946.2(d)**.

Your refusal to provide this assistance — despite promising to do so — constitutes a violation of California law. Mr. Abdul remains entitled to **one month's rent in relocation assistance (\$2,250)**.



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Demand Summary

- **Security Deposit (Return):** \$2,250
- **Statutory Damages for Bad Faith Retention:** \$4,500
- **Relocation Assistance:** \$2,250
- **Civil Penalty for Retaliatory Conduct:** \$2,000
- **TOTAL DEMAND:** \$11,000

Consequences of Noncompliance

If we do not receive the full payment of **\$11,000** and written confirmation by **April 9, 2025**, we will take immediate legal action without further notice. This includes:

- Filing a lawsuit in **California small claims or civil court**
- Seeking full recovery of all amounts, including **statutory damages and penalties**
- Requesting **attorney's fees and sanctions**, if applicable
- Obtaining a **formal court judgment**, which may adversely affect your record

We encourage you to resolve this matter promptly. Payment may be made via **Zelle** or by mailing a **cashier's check** to our office.

Sincerely,

A handwritten signature in blue ink that reads "John Iaccarino".

John Iaccarino, Esq
Attorney at Law
Iaccarino Law Group
Burlingame, CA 94010