

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
FOURTH DIVISION

STATE OF ARKANSAS, *ex rel.*
TIM GRIFFIN, ATTORNEY GENERAL

PLAINTIFF

v.

CASE NO. 60CV-19-5560

ENTROPY SYSTEMS, INC and
IMRAN BOHRA

DEFENDANTS

PETITION TO ENFORCE CONSENT JUDGMENT

The State of Arkansas, *ex rel.* Tim Griffin, Attorney General (“the State”), for its Petition to Enforce Consent Judgment (“Petition”) against Entropy Systems, Inc., and Imran Bohra (collectively referred to as “Defendants”) states:

I. INTRODUCTION

1. On August 5, 2019, the State filed this consumer protection case against Defendants alleging Defendants violated the Arkansas Deceptive Trade Practices Act (“ADTPA”) when they rented residential properties in Pulaski County to consumers before abating existing code violations.

2. On September 13, 2022, the State and Defendants entered into a Consent Judgment that this Court subsequently Ordered on September 27, 2022, that suspended a \$20,000 penalty conditioned upon Defendants compliance with its terms. *See* Exhibit A ¶ VI.B.19, *Consent Judgment* (Sept. 27, 2022).

3. Defendants have failed to abide by the Consent Judgment. Consequently, the State seeks enforcement of the Consent Judgment and an order requiring the Defendants to pay the suspended penalty.

4. In the interest of efficiency and judicial economy, the State provided notice of Defendants' failure to abide by the Consent Judgment on November 21, 2023, and demanded payment of the suspended civil penalty. A copy of the notice and demand is attached as Exhibit B.

5. However, as of the date of this filing, though Defendants' counsel has acknowledged receipt of the notice and demand letter, the Defendants have yet to comply with the State's demand or communicate whether they intend to include an addendum on all leases notifying tenants of the right to file a complaint with the Arkansas Attorney General's Office as required by the Consent Judgment.

II. DEFENDANTS' FAILURE TO PROVIDE NOTICE TO TENANTS

6. According to the Consent Judgment, Defendants agreed "to include an addendum on all leases notifying tenants of the right to file a complaint with the Arkansas Attorney General's Office." *See* Exhibit A ¶ VI.A.16.iv.

7. In the process of reviewing Defendants' compliance with the terms of the Consent Judgment, the State requested that the Defendants provide copies of all leases executed after the date of the Consent Judgment.

8. In response to the State's requests, Defendants provided copies of leases entered into with tenants subsequent to this Court entering the Consent Judgment on September 27, 2022. The forty-four (44) leases Defendants provided in response to the State's requests are attached to this Petition as Exhibit C.¹

¹ Defendants provided three (3) leases in response to the State's requests that were executed prior to the Consent Judgment being entered by this Court. *See* Ex. C, pp. 1-8, 49-52.

9. All leases provided by Defendants failed to include an addendum notifying tenants of their right to file a complaint against the Defendants with the Arkansas Attorney General's Office in accordance with the Consent Judgment.

III. RELIEF

10. The State seeks both injunctive and monetary relief under the Consent Judgment due to Defendants' failure to abide by the Consent Judgment.

11. Specifically, the State seeks an order enjoining Defendants from leasing any property until Defendants include an addendum on all leases notifying tenants of their right to file a complaint with the Arkansas Attorney General's Office.

12. Additionally, pursuant to the Consent Judgment the Defendants were assessed a suspended civil penalty in the amount of \$20,000.00 in the event Defendants failed to abide by the injunctive terms of the Consent Judgment. Exhibit ¶ VI.B.19.

13. Due to Defendants' failure to abide by the terms of the Consent Judgment, the State seeks to enforce the suspended civil penalty of \$20,000.00.

WHEREFORE, the State of Arkansas, *ex rel.* Tim Griffin, Attorney General, respectfully requests that this Court:


- a. Find that Defendants violated the Consent Judgment when Defendants failed to include an addendum on all leases that notified tenants of their right to file a complaint with the Arkansas Attorney General's Office;
- b. Order Defendants to pay the \$20,000.00 civil penalty to the Arkansas Attorney General's Office immediately in accordance with the Consent Judgment;
- c. Enjoin Defendants from entering into any future leases unless an addendum provides the tenant(s) with notice of their right to file a complaint with the Arkansas

Attorney General's Office and until such time as the suspended penalty has been paid in full;

- d. Order Defendants to pay the State's reasonable attorneys' fees and costs of the investigation to enforce the terms of the Consent Judgment and the filing of this petition; and
- e. Order all other just and proper relief to which the State may be entitled.

Respectfully submitted,


TIM GRIFFIN
ATTORNEY GENERAL

By: 
Reid Adkins, Ark. Bar No. 2015216
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
Phone: (501) 682-6491
Fax: (501) 682-8118
Reid.Adkins@ArkansasAG.gov

CERTIFICATE OF SERVICE

I, Reid Adkins, hereby certify that on January 23, 2024, a true and correct copy of the foregoing was served upon the following counsel of record via eFlex:

Edward Adcock, Ark. Bar No. 83001
1018 Cumberland, #11
Little Rock, AR 72202
(p) 501-690-6104
(f) 501-374-5198
egalaw@aol.com


Reid Adkins