

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND
John Marshall Courts Building

COMMONWEALTH OF VIRGINIA,
EX REL. JASON S. MIYARES,
ATTORNEY GENERAL,

Petitioner,

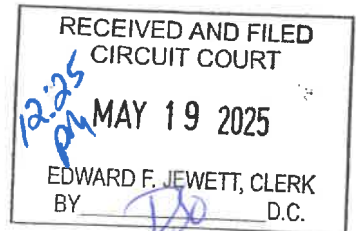
v.

JATTI LLC
d/b/a Manchester Market,
a Virginia limited liability company,

SERVE: Mohammed A. Munir
Registered Agent
7715 Breaker Point Ct.
Chesterfield, Virginia 23832

Respondent.

CIVIL ACTION NO. _____



PETITION TO ENFORCE CIVIL INVESTIGATIVE DEMAND

The Petitioner, Commonwealth of Virginia, by and through its Attorney General, Jason S. Miyares, (the "Commonwealth" or "Attorney General"), petitions this Court, pursuant to Virginia Code § 59.1-9.10, to enforce the Civil Investigative Demand ("CID") issued to Respondent, JATTI LLC d/b/a Manchester Market ("Manchester Market") as part of the Attorney General's investigation into complaints of price gouging during the Richmond water crisis. Despite multiple attempts to obtain critical information from Manchester Market, Respondent in violation of Virginia law has flatly ignored a lawfully issued CID. The Commonwealth, therefore, prays that this Court grant the relief requested in this Petition, specifically, that Manchester Market be ordered to produce all documents and information

responsive to the document requests in the CID. In support thereof, the Commonwealth states the following:

1. The Petitioner is the Commonwealth of Virginia, by and through its Attorney General, Jason S. Miyares.

2. The Respondent is JATTI LLC, a Virginia limited liability company. It does business as a retail convenience store under the name Manchester Market at 500 Hull Street, Richmond, VA.

3. Virginia Code §§ 59.1-9.10 and 59.1-201.1 empower the Attorney General to issue a CID whenever the Attorney General has reasonable cause to believe that any person has engaged in, is engaging in, or is about to engage in any violation of the Virginia Consumer Protection Act ("VCPA"), Virginia Code §§ 59.1-196 through 59.1-207.

4. The Attorney General issued a CID to Manchester Market on March 21, 2025, because he has reasonable cause to believe that Manchester Market may have violated the VCPA and the Virginia Post-Disaster Anti-Price Gouging Act ("Price Gouging Act"), Virginia Code §§ 59.1-525 through 59.1-529.1, by selling bottled water, a necessary good, at an unconscionable price within an area for which a state of emergency was declared. The Price Gouging Act is enforceable through the VCPA. Va. Code §§ 59.1-200.1(A)(41) and 59.1-529. A copy of the CID is attached as **Exhibit A**.

5. The Attorney General's investigation is based on multiple consumer complaints alleging that Manchester Market charged excessive prices for bottled water sold during the state of emergency declared by Governor Glenn Youngkin on January 3, 2025 in anticipation of the arrival of several winter weather systems into Virginia.

6. The winter storms that prompted the state of emergency disrupted power at

Richmond City's main water treatment plant, resulting in boil water advisories being issued by, and complete and partial water outages in, the City of Richmond and surrounding localities. This resulted in water shortages that lasted for days in the referenced localities.

7. The investigation of the practices identified is based on multiple consumer complaints filed with the Office of the Attorney General. Prior to issuing a CID, the Commonwealth made two attempts through letters to Manchester Market to obtain the information requested. The Commonwealth did not receive a response to those letters.

8. Pursuant to Virginia Code § 59.1-9.10(E)(1), the Commonwealth served the CID on Manchester Market by private process server at its principal business location at 500 Hull Street in Richmond on March 31, 2025. A copy of the Affidavit of Service detailing delivery of the CID is attached as **Exhibit B**.

9. Pursuant to Virginia Code § 59.1-9.10(B)(iii), the CID required the production of certain books or papers that are relevant or material to the inquiry. Namely, the Commonwealth sought the production of documentation detailing the various prices at which Manchester Market sold bottled water before and during the state of emergency, which would enable the Commonwealth to determine whether and by how much Manchester Market increased prices during the time of disaster. The CID provided that Manchester Market had until April 16, 2025 to respond. To date Manchester Market has not produced the documents requested in the CID or otherwise responded to the CID.

10. Accordingly, the Commonwealth seeks to have this Court enter an order to enforce the CID by compelling Manchester Market to respond to the CID.

11. The Circuit Court for the City of Richmond has authority to consider this petition pursuant to Virginia Code §§ 59.1-9.10(F), 59.1-9.10(K), and 17.1-513.

WHEREFORE the Commonwealth of Virginia, *ex. rel.* Attorney General Jason S. Miyares, respectfully requests that this Court:

A. Enter an order compelling Manchester Market to produce all documents and information responsive to the document requests in the Attorney General's CID; and

B. Grant such other further relief as the Court deems equitable and proper.

COMMONWEALTH OF VIRGINIA,
EX REL. JASON S. MIYARES,
ATTORNEY GENERAL

By: 

Mark S. Kubiak

Jason S. Miyares
Attorney General

Steven G. Popps
Chief Deputy Attorney General

Thomas J. Sanford
Deputy Attorney General

Richard S. Schweiker, Jr.
Senior Assistant Attorney General and Chief

Mark S. Kubiak (VSB No. 73119)
Senior Assistant Attorney General
Consumer Protection Section
202 North Ninth Street
Richmond, Virginia 23219
Phone: (804) 786-7364
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Email: mkubiak@oag.state.va.us



OFFICE OF THE ATTORNEY GENERAL
COMMONWEALTH OF VIRGINIA
202 NORTH NINTH STREET
RICHMOND, VIRGINIA 23219

CID NO. 1-RWPG

VIA PRIVATE PROCESS SERVER

TO: JATTI LLC d/b/a Manchester Market
500 Hull Street
Richmond, Virginia 23224


CIVIL INVESTIGATIVE DEMAND

The Attorney General of the Commonwealth of Virginia under the authority conferred upon him by § 59.1-201.1 of the Virginia Consumer Protection Act ("VCPA"), Virginia Code §§ 59.1-196 to 59.1-207, commands your production of the information and documents described here to the Office of the Attorney General, 202 North Ninth Street, Richmond, Virginia 23219, by the means specified here by 4:00 p.m. on April 16, 2025.

This Civil Investigative Demand ("CID") is issued in connection with an investigation by the Attorney General into possible violations by JATTI LLC d/b/a Manchester Market ("Manchester Market") of the VCPA, specifically Virginia Code §§ 59.1-200(A)(41) and 59.1-527. Based on information provided to our Office and our own investigation, we have reason to believe that Manchester Market may have, during a time of disaster, sold bottled water, a necessary good, at an unconscionable price within an area for which a state of emergency was declared.

Please refer any questions you may have about this CID to Mark S. Kubiak, Senior Assistant Attorney General, Consumer Protection Section, 202 North Ninth Street, Richmond, Virginia 23219, (804) 786-7364.

This CID is issued at Richmond, Virginia, this 21st day of March, 2025.


RICHARD S. SCHWEIKER, JR.
CHIEF/SENIOR ASSISTANT ATTORNEY GENERAL
CONSUMER PROTECTION SECTION

cc: Mohammad A. Munir, Registered Agent (via first class mail)
7715 Breaker Point Ct.
Chesterfield, Virginia 23832

ATTACHMENT
INSTRUCTIONS

1. Unless otherwise indicated, each paragraph of this CID relates to the period from January 3, 2025 through the present date. Any documents prepared during this time period, or before this time period but which relate thereto, are also to be produced.

2. If any document requested was, but is no longer in your possession, subject to your control, or in existence, state for each such document:

- (a) the type of document;
- (b) whether it is missing, lost, has been destroyed, or has been transferred to the possession, custody, or control of other persons;
- (c) the circumstances surrounding, and the authorization for, the disposition described in (b) above;
- (d) the date or approximate date of the disposition described in (b) above;
- (e) the identity of all persons having knowledge of the circumstances described in (c) above; and
- (f) the identity of all persons having knowledge of the document's contents.

3. With respect to each document produced, identify the person producing the document and the paragraph number of the request in response to which such production is being made.

4. All uses of the conjunctive should be interpreted as including the disjunctive and vice versa in order to bring within the scope of this CID any information or documents that might otherwise be construed to be outside of its scope.

5. Words in the singular should be read to include the plural and vice versa.

6. Each document request contemplates production of the entire document without abbreviation or deletion.

7. If you have a document retention/destruction program, you are asked to suspend it immediately. Regardless of whether you have a document retention/destruction program, you should take precautions to ensure that no documents called for by this CID are inadvertently or intentionally destroyed.

8. Optional methods of compliance.

A. This CID requires the personal appearance of a representative of the company when you produce the documents herein described. The purpose of the appearance is to testify under oath as to the fact and manner of compliance herewith. At your option, you may substitute the filing of an affidavit for the personal appearance. Such affidavit must set forth the matter contained in the form affidavit delivered herewith. Any alteration of the form except to complete it as indicated may be treated as a refusal to comply with this CID and result in action by this Office pursuant to *Virginia Code* §§ 59.1-9.10 and 59.1-201.1 **If you elect to exercise this option, please notify the Office of the Attorney General no later than seven (7) days prior to the time you are required to appear.**

B. This CID also requires generally the production of original documents. At your option, you may substitute a readable duplicate of an original writing, if you identify it as a duplicate and if you agree without qualification that thereafter, at anytime during the course of this investigation or any litigation arising therefrom, the original document will be delivered for inspection by the Attorney General within five (5) days after receipt by you or your attorney of a demand therefor.

DEFINITIONS

1. "Documents" include all representations of words, letters, symbols, numbers, or figures, whether (i) printed or inscribed on a tangible medium or (ii) stored in an electronic or other medium and retrievable in a perceivable form.

2. "JATTI LLC" and "Manchester Market", "you", and "your" refers to JATTI LLC d/b/a Manchester Market and its members, managers, employees, agents, affiliates, or other representatives. It includes the retail business located at 500 Hull Street, Richmond, Virginia 23224.

3. "Bottled water" refers to all bottled water sold, irrespective of brand, packaging size, or case size.

DOCUMENTS TO BE PRODUCED

1. All documents detailing or identifying the various prices at which Manchester Market charged consumers for bottled water during the period from December 24, 2024 to January 2, 2025.

2. All documents detailing or identifying the various prices at which Manchester Market charged consumers for bottled water during the period from January 3, 2025 to the present;

3. All documents detailing or identifying the quantity of bottled water sold during the period from January 3, 2025 to the present; and

4. All invoices detailing your purchase of bottled water for resale, and sold by you during the period from January 3, 2025 to the present.

FORM OF AFFIDAVIT OF COMPLIANCE WITH
CIVIL INVESTIGATIVE DEMAND

The undersigned, *[insert name and job title of person responsible for producing documents on behalf of the company]*, has *[conducted or supervised, whichever is appropriate]* a complete and comprehensive search of all files and records of JATTI LLC d/b/a Manchester Market, at *[state the location(s) where search was conducted]*. All documents that are responsive to Civil Investigative Demand No. 1-RWPG are included in the company's return. All documents produced here are authentic and genuine.

JATTI LLC

By: _____
[Signature]

Name: _____
Printed Name

Title: _____

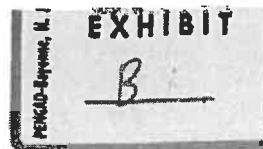
CITY/COUNTY OF _____

STATE/COMMONWEALTH OF _____

Sworn to and subscribed before me, a notary public in and for the jurisdiction aforesaid, this ____ day of _____, 2025.

Notary Public

My Commission expires: / /



AFFIDAVIT OF SERVICE

Civil Investigative Demand with Attachment

Case Number: CID NO. 1-RWPG

Plaintiff:

vs.

Defendant:

Jatti, LLC

Received by Hester Process Service, Inc. to be served on **JATTI, LLC d/b/a Manchester Market, 500 Hull Street, Richmond, VA 23224.**

I, David M. Hester, Sr., being duly sworn, depose and say that on the **31st day of March, 2025 at 9:50 am,**
I:

SUBSTITUTE served by delivering a true copy of the **Civil Investigative Demand with Attachment** with the date and hour of service endorsed thereon by me, to: **Ms. Kusum Cha** as Manager, a person employed therein and authorized to accept service for **JATTI, LLC d/b/a Manchester Market** at the address of: **500 Hull Street, Richmond, VA 23224**, the within named person's usual place of **Work**, in compliance with State Statutes.

I certify that I am over the age of 18, not a party to the above-named action, nor otherwise interested in the subject matter in controversy.

Subscribed and sworn to before me on the 1st day
of April, 2025 by the affiant who is personally known
to me.

Notary public

David M. Hester, Sr.
Process Server

Hester Process Service, Inc.
P.O. Box 37128
N. Chesterfield, VA 23234
(804) 271-0298

Our Job Serial Number: HTR-2025002939

Commonwealth of Virginia
County of Chesterfield
My Commission Expires 11/30/2028

