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February 19, 2026

Via Email and Personal Service

Matt Ilbak
Chief Executive Officer
IGP Business Group
22500 Town Circle, Suite 1206
Moreno Valley, CA 92553

Re: Notice of Pending Building, Municipal, and Fire Code Violations at Moreno Valley Mall

Dear Mr. Ilbak:

Please be advised that there continues to remain multiple unresolved violations of the Moreno Valley Municipal Code, the California Building Code, and the California Fire Code at the commercial property constituting the Moreno Valley Mall, located at 22500 Town Circle (A.P.N.s 291-110-032, 291-110-033, 291-110-034, and 291-110-035) (“Subject Property”).

In a letter addressed to you, dated January 16, 2026, you were reminded that various fire protection systems were demolished, removed, or modified without prior approval by the Fire Department, which include basic life-saving devices such as fire alarms and fire sprinklers. In addition, you were reminded that there were several pending violations associated with unpermitted high-piled storage in and along interior walk aisles, which hinder and/or prevent safe access and evacuation during a fire emergency. Moreover, as also noted in the January 16 letter, you were informed that the City’s Community Enhancement and Neighborhood Services Division had issued 88 code violation citations since 2019, which included citations for unpermitted construction, the lack of required certificates of occupancy, deteriorated parking areas due to cracked pavement and curbing, inadequate and incomplete parking and lane striping, insufficient parking lot lighting, accumulation of trash and debris, inadequate landscape maintenance made evident by the many dead and missing plants and damaged curbing, graffiti, lack of appropriate business licenses, etc. You were also reminded that the operation of the Mall’s escalators continued to remain intermittent, indicating that some more repair work may be necessary to ensure their safe use by the public.

Notwithstanding the above, and despite all of the notices, correspondence and citations sent to your attention and the conversations various City staff and the Fire Department personnel have had with you and/or your representatives regarding the aforementioned violations, you remain committed to either ignoring their existence and/or disregarding the seriousness of the violations, although many of these violations clearly pose immediate risks to the health and safety of your employees, the Mall's retail tenants, the tenants' thousands of employees, and members of the general public which include the Mall's shoppers and visitors. Your lack of any reasonable and rational response (or no response at all) to this very serious situation is a continuing concern to the City and the Fire Department; as such, this has prompted my office to explore all available remedies for ensuring that the Subject Property is managed and operated in a manner that most efficiently and effectively results in the abatement of all the subject violations which pose any real and immediate threat to health and safety.

In light of the foregoing, please be advised that pursuant to the City's enforcement powers under applicable California law and the Moreno Valley Municipal Code, the City will continue to pursue a range of civil enforcement remedies to obtain compliance with all pending Municipal Code, California Building Code and California Fire Code violations. Such remedies include, but are not limited to:

1. Administrative citations and fines;
2. Civil penalties;
3. Abatement proceedings;
4. Injunctive relief; and
5. Recovery of enforcement costs and attorney's fees where authorized by statute or ordinance.

In addition to the above, my office may request the judicial appointment of a receiver over the Subject Property. A court-appointed receiver is a neutral third party who would be granted authority to:

1. Take full control and possession of the Subject Property;
2. Manage operations and collect rents or other income;
3. Secure, repair, and rehabilitate the Subject Property;
4. Pay outstanding bills necessary to bring the Subject Property into compliance;
5. Borrow funds to complete required work; and
6. Record a super-priority lien against the Subject Property to secure repayment of receiver expenses and any costs incurred by the City to gain compliance.

Under applicable law, receiver costs, including rehabilitation expenses, administrative costs, and attorney's fees, may be secured by a lien with priority over existing encumbrances.

Please know that my office would prefer to avoid the receivership remedy; however, due to your inaction and lack of any evidence that you are committed to resolving any of the pending violations, including the ones that obviously pose an immediate threat to health and safety, my office plans to pursue all legally available options necessary.

Regards,

Steven B. Quintanilla

Steven B. Quintanilla
City Attorney

cc: Brian Mohan, City Manager
James Verdugo, Building Division Manager/Building Official
Jesse Park, Fire Chief
Edgar Gonzalez, Fire Marshall