

BEFORE THE DIRECTOR OF THE  
DEPARTMENT OF CONSUMER AFFAIRS  
BUREAU OF HOUSEHOLD GOODS & SERVICES  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**MHAS COMPANIES, INC., dba MATTRESS EXPRESS CALI; MANPREET HAYER, PRINCIPAL;**

**AMRITPAL SARAN, PRINCIPAL**

1811 Douglas Blvd. Ste 8A

Roseville, CA 95661

Furniture and Bedding Retailer No. 172768

Respondent.

Case No. M-172768

**ORDER DENYING RECONSIDERATION OF DEFAULT DECISION**

The default decision (Decision) in the above-captioned matter was adopted by the Director of the Department of Consumer Affairs (Director) on February 4, 2025, effective March 13, 2025. Respondent did not timely submit a motion to vacate the decision pursuant to Government Code section 11520. On March 7, 2025, Respondent submitted a petition to reconsider the decision and stay request. No timely motion to vacate the decision having been submitted, and no good cause therefor appearing, the petition is hereby DENIED.

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The Decision remains effective **March 13, 2025**.

IT IS SO ORDERED

March 12, 2025.



\_\_\_\_\_  
RYAN MARCROFT

Deputy Director

Legal Affairs Division

Department of Consumer Affairs

LANDON T. LITTLE 271494  
RICH, FUIDGE, BORDSEN & GALYEAN, INC.  
1129 "D" STREET (P.O. BOX A)  
MARYSVILLE, CA 95901  
TELEPHONE: (530) 742-7371  
FACSIMILE: (530) 742-5982

Attorneys for Respondents  
MHAS COMPANIES, INC and  
AMRITPAL SARAN

**BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF HOUSEHOLD GOODS AND SERVICES  
STATE OF CALIFORNIA**

IN THE MATTER OR THE ACCUSATION  
AGAINST:

Case No.: M-172768

**MHAS COMPANIES, INC. DBA MATTRESS  
EXPRESS CALI; MANPREET HAYER,  
PRINCIPAL; AMRITPAL SARAN, PRINCIPAL  
1811 DOUGLAS BLVD, STE 8A  
ROSEVILLE, CA 95661**

RESPONDENTS' PETITION FOR  
RECONSIDERATION AND REQUEST FOR  
STAY OF EXPIRATION (CAL. GOV. CODE  
SECTION 11521)

**FURNITURE AND BEDDING RETAILER NO.  
172768**

**Respondent.**

RESPONDENTS, MHAS COMPANIES, INC DBA MATTRESS CALI and AMRITPAL SARAN, hereby  
petitions the BUREAU OF HOUSEHOLD GOODS AND SERVICES, STATE OF CALIFORNIA for  
reconsideration of the Default Decision and Order dated February 4, 2025 and served thereafter on February  
11, 2025 pursuant to Cal. Gov. Code Section 11521. Respondent's petition is supported by the points and  
authorities below and the Declaration of AMRITPAL SARAN, filed herewith. Respondents request that  
they be allowed leave to file a Notice of Defense or in the alternative be allowed to present evidence in  
extenuation and mitigation as to the proper discipline.

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RESPONDENTS' PETITION FOR RECONSIDERATION AND REQUEST FOR STAY OF EXPIRATION  
(CAL. GOV. CODE SECTION 11521)

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. THE BUREAU OF HOUSEHOLD GOODS AND SERVICES SHOULD RECONSIDER THE SUBJECT DEFAULT DECISION AND ORDER.**

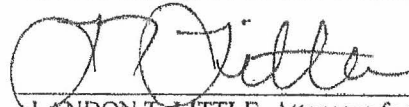
"The agency itself may order a reconsideration of all or part of the case...on petition of any party." Cal. Gov. Code Section 11521(a). Good cause exists for reconsideration in this case, because the Respondent did not receive actual notice of the underlying Accusation and has, at a minimum, evidence of mitigating factors to be presented. Respondent was not personally served and was involved in a two person business where there were substantial communication breakdowns. Ultimately, this lead to the involuntary dissolution of the Respondent corporation. Respondent AMRITPAL SARAN, is attempting to bring his business back into compliance. Further, the hardship upon he and his family will be severe if he loses his license. An agency has the authority to grant reconsideration for the limited purpose of allowing a respondent to offer evidence in extenuation and mitigation as to the proper discipline. *Evans v. Department of Motor Vehicles* (1994) 21 Cal. App. 4th 958.

**II. THE BUREAU OF HOUSEHOLD GOODS AND SERVICES SHOULD STAY REVOCATION OF RESPONDENT'S LICENSE WHILE THIS PETITION IS PENDING.**

"If additional time is needed to evaluate a petition for reconsideration filed prior to the expiration of any of the applicable periods, an agency may grant a stay of that expiration for no more than 10 days." Cal. Gov. Code Section 11521(b). Accordingly, the agency should stay enforcement of the subject order until this petition has been fully considered.

Dated: 3/7/2025

RICH, FUIDGE, BORDSEN & GALYEAN, INC.



LANDON T. LITTLE, Attorneys for  
Respondents

**PROOF OF SERVICE**

I, the undersigned, declare that:

I am employed in the City of Marysville, County of Yuba, State of California. I am over the age of 18 years and not a party to the within action. My business address is 1129 "D" Street, Marysville, California 95901.

On March 7, 2025 I served the attached

**Respondent's Petition for Reconsideration and Request for Stay of Expiration (Cal. Gov. Code Section 11521)**

**Declaration of Amritpal Saran in Support of Respondent's Petition for Reconsideration and Request for Stay of Expiration**

☒ **BY FACSIMILE:** By transmitting the same from a facsimile machine (530) 742-5982 to the person(s) identified below whose facsimile transmission machine telephone number(s) listed below. The transmission was reported complete without error by a transmission report issued by the sending facsimile transmission machine.

Department of Consumer Affairs  
Bureau of Household Goods and Services  
(916) 921-7279

☒ **BY MAIL:** I placed a true copy thereof in a sealed envelope with postage thereon fully prepared for mail, in the designated outgoing mail receptacle at RICH, FUIDGE, BORDSEN & GALYEAN, INC. for collection by another employee who is responsible in the normal course of business, for depositing the stamped envelopes for mailing this same day in the United States Mail at 1129 "D" Street, Marysville, California addressed to:

Department of Consumer Affairs  
Bureau of Household Goods and Services  
4244 South Market Court, Suite D  
Sacramento, CA 95834

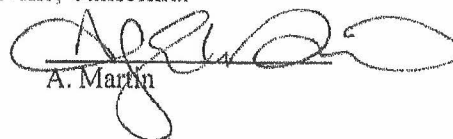
☐ **BY OVERNIGHT DELIVERY:** I placed a true copy thereof in a sealed envelope and depositing copies of the above documents in a box or other facility regularly maintained by Federal Express - overnight delivery, in an envelope or package designated by the Federal Express with delivery fees paid or provided for to the addressee(s) noted below:

☒ **BY EMAIL:** I emailed a true copy thereof to the persons listed below, at their respective email addresses, pursuant to the agreement of the parties, as follows:

Deputy Attorney General Jeff Stone  
[Jeff.Stone@doj.ca.gov](mailto:Jeff.Stone@doj.ca.gov)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed March 7, 2025 at Marysville, California.

  
A. Martin

LANDON T. LITTLE 271494  
RICH, FUIDGE, BORDSEN & GALYEAN, INC.  
1129 "D" STREET (P.O. BOX A)  
MARYSVILLE, CA 95901  
TELEPHONE: (530) 742-7371  
FACSIMILE: (530) 742-5982

Attorneys for Respondents  
MHAS COMPANIES, INC and  
AMRITPAL SARAN

BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF HOUSEHOLD GOODS AND SERVICES  
STATE OF CALIFORNIA

IN THE MATTER OR THE ACCUSATION  
AGAINST:

Case No.: M-172768

MHAS COMPANIES, INC. DBA MATTRESS  
EXPRESS CALI; MANPREET HAYER,  
PRINCIPAL; AMRITPAL SARAN, PRINCIPAL  
1811 DOUGLAS BLVD, STE 8A  
ROSEVILLE, CA 95661

DECLARATION OF AMRITPAL SARANT IN  
SUPPORT OF RESPONDENT'S PETITION FOR  
RECONSIDERATION AND REQUEST FOR  
STAY OF EXPIRATION

FURNITURE AND BEDDING RETAILER NO.  
172768

Respondent.

I, AMRITPAL SARAN, DECLARE AS FOLLOWS:

1. I am one of the Respondents in the above-referenced administrative action.
2. I was a shareholder and director in Respondent MHAS COMPANIES, INC.
3. The other shareholder in Respondent MHAS COMPANIES, INC. was Respondent MANPREET HAYER.
4. At all times relevant, MANPREET HAYER, was the agent for service of process for MHAS COMPANIES, INC. and was generally in charge of legal compliance for our business.

DECLARATION OF AMRITPAL SARANT IN SUPPORT OF RESPONDENT'S PETITION FOR  
RECONSIDERATION AND REQUEST FOR STAY OF EXPIRATION

- 1 5. In 2024, MANPREET HAYER and I began having disagreements regarding business operations
- 2 that became irreconcilable. Mr. HAYER refused to communicate with me regarding legal
- 3 compliance issues that I knew were impacting our business.
- 4 6. On September 30, 2024, I dissolved MHAS COMPANIES, INC. due to the ongoing disagreements
- 5 with MANPREET.
- 6 7. I was not aware of the subject Accusation and Default Decision and Order until February 2025.
- 7 8. I am currently working to bring my business into legal compliance and am prepared to pay and all
- 8 sums necessary to resolve any prior fines and penalties, judgments, and the cost of any future
- 9 probation.
- 10 9. My furniture store is my sole source of income to support myself and my family and I am willing
- 11 to take all steps necessary to continue to operate it.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing

13 is true and correct.

14 Date: 03 / 07 / 2025

*Amritpal Saran*

Amritpal Saran

DECLARATION OF AMRITPAL SARANT IN SUPPORT OF RESPONDENT'S PETITION FOR  
RECONSIDERATION AND REQUEST FOR STAY OF EXPIRATION

**PROOF OF SERVICE**

I, the undersigned, declare that:

I am employed in the City of Marysville, County of Yuba, State of California. I am over the age of 18 years and not a party to the within action. My business address is 1129 "D" Street, Marysville, California 95901.

On March 7, 2025 I served the attached

**Respondent's Petition for Reconsideration and Request for Stay of Expiration (Cal. Gov. Code Section 11521)**

**Declaration of Amritpal Saran in Support of Respondent's Petition for Reconsideration and Request for Stay of Expiration**

☒ **BY FACSIMILE:** By transmitting the same from a facsimile machine (530) 742-5982 to the person(s) identified below whose facsimile transmission machine telephone number(s) listed below. The transmission was reported complete without error by a transmission report issued by the sending facsimile transmission machine.

Department of Consumer Affairs  
Bureau of Household Goods and Services  
(916) 921-7279

☒ **BY MAIL:** I placed a true copy thereof in a sealed envelope with postage thereon fully prepared for mail, in the designated outgoing mail receptacle at RICH, FUIDGE, BORDSEN & GALYEAN, INC. for collection by another employee who is responsible in the normal course of business, for depositing the stamped envelopes for mailing this same day in the United States Mail at 1129 "D" Street, Marysville, California addressed to:

Department of Consumer Affairs  
Bureau of Household Goods and Services  
4244 South Market Court, Suite D  
Sacramento, CA 95834

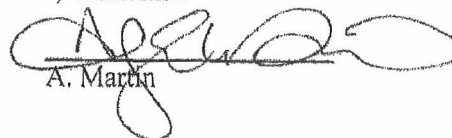
☐ **BY OVERNIGHT DELIVERY:** I placed a true copy thereof in a sealed envelope and depositing copies of the above documents in a box or other facility regularly maintained by Federal Express - overnight delivery, in an envelope or package designated by the Federal Express with delivery fees paid or provided for to the addressee(s) noted below:

☒ **BY EMAIL:** I emailed a true copy thereof to the persons listed below, at their respective email addresses, pursuant to the agreement of the parties, as follows:

Deputy Attorney General Jeff Stone  
[Jeff.Stone@doj.ca.gov](mailto:Jeff.Stone@doj.ca.gov)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed March 7, 2025 at Marysville, California.

  
A. Martin





February 11, 2025

VIA CERTIFIED AND REGULAR MAIL

MHAS COMPANIES, INC DBA  
MATTRESS EXPRESS CALI  
MANPREET HAYER  
1811 Douglas Blvd., Ste. 8A  
Roseville, CA 95661

Subject: Default Decision and Order, BHGS Case No. A1 2023-363

Dear Manpreet Hayer,

The enclosed Default Decision and Order with the Bureau of Household Goods and Services is effective March 13, 2025. Please reference this Default Decision and Order and the other enclosures should you have any questions regarding this matter.

Also enclosed is a copy of the Government Code §11521 to notify you of the time limits to petition for reconsideration of the decision.

Sincerely,

A handwritten signature in cursive script that reads 'C Goldstene'.

Claire Goldstene  
Deputy Chief  
Bureau of Household Goods and Services  
(916) 999-2041

Enclosure: Default Decision and Order  
Government Code §11521

cc: Agustin Lopez, Deputy Attorney General



**GOVERNMENT CODE - GOV**

**TITLE 2. GOVERNMENT OF THE STATE OF CALIFORNIA [8000 - 22980]**

*( Title 2 enacted by Stats. 1943, Ch. 134. )*

**DIVISION 3. EXECUTIVE DEPARTMENT [11000 - 15986]**

*( Division 3 added by Stats. 1945, Ch. 111. )*

**PART 1. STATE DEPARTMENTS AND AGENCIES [11000 - 11898]**

*( Part 1 added by Stats. 1945, Ch. 111. )*

**CHAPTER 5. Administrative Adjudication: Formal Hearing [11500 - 11529]**

*( Heading of Chapter 5 amended by Stats. 1995, Ch. 938, Sec. 22. )*

11521. (a) The agency itself may order a reconsideration of all or part of the case on its own motion or on petition of any party. The agency shall notify a petitioner of the time limits for petitioning for reconsideration. The power to order a reconsideration shall expire 30 days after the delivery or mailing of a decision to a respondent, or on the date set by the agency itself as the effective date of the decision if that date occurs prior to the expiration of the 30-day period or at the termination of a stay of not to exceed 30 days which the agency may grant for the purpose of filing an application for reconsideration. If additional time is needed to evaluate a petition for reconsideration filed prior to the expiration of any of the applicable periods, an agency may grant a stay of that expiration for no more than 10 days, solely for the purpose of considering the petition. If no action is taken on a petition within the time allowed for ordering reconsideration, the petition shall be deemed denied.

(b) The case may be reconsidered by the agency itself on all the pertinent parts of the record and such additional evidence and argument as may be permitted, or may be assigned to an administrative law judge. A reconsideration assigned to an administrative law judge shall be subject to the procedure provided in Section 11517. If oral evidence is introduced before the agency itself, no agency member may vote unless he or she heard the evidence.



## DECLARATION OF SERVICE

In the Matter of: **MHAS COMPANIES DBA MATTRESS EXPRESS CALI**

I, the undersigned, declare that I am over eighteen (18) years of age and not a party to the entitled action. I am employed in the County of Sacramento, and my business address is Bureau of Household Goods and Services, 4244 South Market Court, Suite D, Sacramento, California 95834-1243.

On February 11, 2025, I served the foregoing document described as:

### DEFAULT DECISION AND ORDER BHGS Case No. A1 2023-363

on the interested party or parties to this action by placing both an original and a true copy thereof enclosed in sealed envelopes addressed as set forth below:

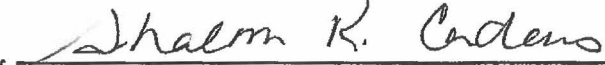
**Certified Mail No.: 9214 8901 9403 8300 5386**

MHAS COMPANIES, INC DBA  
MATTRESS EXPRESS CALI  
MANPREET HAYER  
1811 Douglas Blvd., Ste. 8A  
Roseville, CA 95661

On February 11, 2025, the envelopes were placed in a designated location for collection by staff and for mailing, both by regular and certified mail, with the U.S. Postal Service in accordance with ordinary business practices.

I am readily familiar with our Department's practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Under that practice, it would be collected by the Department's mailroom staff from our Sacramento office and be deposited with the U.S. Postal Service on that same day with certified mail and first-class mail postage thereon fully prepaid at Sacramento, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing contained in this declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 11<sup>th</sup> day of February 2025.

  
Shalom Rojas Cardenas, Bureau Representative

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8 **BEFORE THE**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **FOR THE BUREAU OF HOUSEHOLD GOODS AND SERVICES**  
11 **STATE OF CALIFORNIA**

12  
13 In the Matter of the Accusation Against:

Case No. M-172768

14 **MHAS COMPANIES, INC. DBA**  
15 **MATTRESS EXPRESS CALI;**  
16 **MANPREET HAYER, PRINCIPAL;**  
17 **AMRITPAL SARAN, PRINCIPAL**  
18 1811 Douglas Blvd., Ste 8A  
19 Roseville, CA 95661

**DEFAULT DECISION AND ORDER**

[Gov. Code, §11520]

20 **Furniture and Bedding Retailer No. 172768**

21  
22 Respondent.

23 **FINDINGS OF FACT**

24 1. On or about October 22, 2024, Complainant Nicholas Oliver, in his official capacity  
25 as the Bureau Chief of the Bureau of Household Goods and Services (Complainant), Department  
26 of Consumer Affairs, filed Accusation No. M-172768 against MHAS Companies, Inc. dba  
27 Mattress Express Cali; Manpreet Hayer and Amritpal Saran, Principals (Respondent) before the  
28 Director of the Department of Consumer Affairs. (Accusation attached as Exhibit A.)

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1 2. On or about May 18, 2017, the Bureau issued Furniture and Bedding Retailer Number  
2 172768 to Respondent. The Furniture and Bedding Retailer License expired May 31, 2021, and  
3 was renewed September 23, 2022; and then expired May 3, 2023, and was renewed October 3,  
4 2023. Otherwise, the Furniture and Bedding Retailer License was in full force and effect at all  
5 times relevant to the charges brought herein and will expire on May 31, 2025, unless renewed.

6 3. On or about October 24, 2024, Respondent was served by Certified and First-Class  
7 Mail copies of the Accusation No. M-172768, Statement to Respondent, Notice of Defense,  
8 Request for Discovery and Discovery Statutes (Government Code sections 11507.5, 11507.6, and  
9 11507.7) at Respondent's address of record which, pursuant to Business and Professions Code  
10 section 136, is required to be reported and maintained with the Bureau. Respondent's address of  
11 record was and is:

12 1811 Douglas Blvd., Ste 8A  
13 Roseville, CA 95661

14 4. Service of the Accusation was effective as a matter of law under the provisions of  
15 Government Code section 11505(c) and/or Business and Professions Code section 124.

16 5. Government Code section 11506(c) states, in pertinent part:

17 (c) The respondent shall be entitled to a hearing on the merits if the respondent  
18 files a notice of defense . . . and the notice shall be deemed a specific denial of all  
19 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense  
20 . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its  
21 discretion may nevertheless grant a hearing.

22 6. The Bureau takes official notice of its records and the fact that Respondent failed to  
23 file a Notice of Defense within 15 days after service upon them of the Accusation, and therefore  
24 waived its right to a hearing on the merits of Accusation No. M-172768.

25 7. California Government Code section 11520(a) states, in pertinent part:

26 (a) If the respondent either fails to file a notice of defense . . . or to appear at  
27 the hearing, the agency may take action based upon the respondent's express  
28 admissions or upon other evidence and affidavits may be used as evidence without  
any notice to respondent . . . .

29 8. Pursuant to its authority under Government Code section 11520, the Director finds  
Respondent is in default. The Director will take action without further hearing and, based on the

1 relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter,  
2 finds that the charges and allegations in Accusation No. M-172768, are separately and severally,  
3 found to be true and correct by clear and convincing evidence.

4 9. The Director finds that the actual costs for Investigation and Enforcement are  
5 \$13,639.25 as of December 20, 2024.

#### 6 DETERMINATION OF ISSUES

7 1. Based on the foregoing findings of fact, Respondent MHAS Companies, Inc. dba  
8 Mattress Express Cali; Manpreet Hayer and Anritpal Saran, Principals (Respondent) have  
9 subjected Furniture and Bedding Retailer License No. 172768 to discipline.

10 2. The agency has jurisdiction to adjudicate this case by default.

11 3. The Director of the Department of Consumer Affairs is authorized to revoke  
12 Respondent's Furniture and Bedding Retailer License based upon the following violations alleged  
13 in the Accusation which are supported by the evidence contained in the Default Decision  
14 Investigatory Evidence Packet in this case:

15 a. Respondent violated Business and Professions Code sections 125.9, 9855.1, 19049  
16 19051, 19055, 19061, 19150, 19200, and 19206, and California Code of Regulations sections  
17 1304.1, 1308, 1310, and 1314 by, among other things:

- 18 • failing to comply with citation orders of abatement and to pay fines;
- 19 • false advertising/misrepresentations;
- 20 • false and misleading guarantees/failures to disclose;
- 21 • advertising or implying that imperfect, irregular, second, or damaged articles were  
22 free from defects or were of the same grade or quality of the article customarily  
23 offered for sale in the ordinary course of business;
- 24 • operating without a valid registration and/or license;
- 25 • advertising as "custom made" merchandise that was not made to order and  
26 specifications of consumers;
- 27 • operating under more than one firm name;

28 ///

- denial of Bureau access to premises, equipment, material, articles, and/or records;  
and
- obstructing Bureau investigations.

**ORDER**

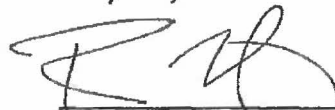
IT IS SO ORDERED that Furniture and Bedding Retailer No. 172768, issued to Respondent MHAS Companies, Inc. dba Mattress Express Cali; Manpreet Hayer and Amritpal Saran, Principals, is revoked.

IT IS FURTHER ORDERED that MHAS Companies, Inc. dba Mattress Express Cali; Manpreet Hayer and Amritpal Saran, principals, are prohibited from serving as a member of any licensed limited liability company or of any licensed partnership, or as an officer or director of any licensed corporation, or as an officer or person acting in a managerial capacity of any licensed firm or association, and the employment, election, or association of MHAS Companies, Inc. dba Mattress Express Cali; Manpreet Hayer and Amritpal Saran, principals constitute grounds for disciplinary action against the licensee.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on March 13, 2025.

It is so ORDERED February 4, 2025



RYAN MARCROFT  
DEPUTY DIRECTOR  
LEGAL AFFAIRS DIVISION  
DEPARTMENT OF CONSUMER AFFAIRS

Default Decision and Order - L.I.C.docx  
DOJ Matter ID:SA2024302633

Attachment:  
Exhibit A: Accusation