



**AFTAB PUREVAL
HAMILTON COUNTY CLERK OF COURTS**

COMMON PLEAS DIVISION

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AFTAB PUREVAL
Clerk of Courts
Hamilton County, Ohio
CONFIRMATION 912487**

**STATE OF OHIO EX REL
ATTORNEY GENERAL DAVE
YOST**

A 2000240

vs.

**ECONOMY MOTORS LLC
DBA GAS HOGS**

**FILING TYPE: INITIAL FILING (IN COUNTY) WITH NO JURY
DEMAND**

PAGES FILED: 7

EFR200



VERIFY RECORD

1. Plaintiff, State of Ohio, through Counsel Attorney General of Ohio, Dave Yost, having reasonable cause to believe that violations of Ohio's consumer protection laws have occurred, brings this action in the public interest and on behalf of the State of Ohio under the authority vested in the Attorney General by R.C. 1345.07.
2. The actions of the Defendants have occurred in the State of Ohio, including Hamilton County and, as set forth below, are in violation of the Consumer Sales Practices Act (CSPA), R.C. 1345.01 *et seq.*, and the Certificate of Motor Vehicle Title Act, R.C. 4505.01 *et seq.*
3. Jurisdiction over the subject matter of this action lies with this Court pursuant to R.C. 1345.04 of the CSPA.
4. This Court has venue to hear this case pursuant to Ohio Civ. R. 3(C)(2) and (3), in that Hamilton County is where Defendants' principal places of business were located and where Defendants conducted some of the transactions complained of herein.
5. Defendants are "suppliers" as that term is defined in R.C. 1345.01(C) as Defendants were, at all times relevant herein, engaged in the business of effecting or soliciting "consumer transactions" by offering for sale and selling used motor vehicles to individuals for purposes that were primarily personal, family, or household within the meaning specified in R.C. 1345.01(A) and (D).

STATEMENT OF FACTS

6. Defendant Jeremy Skeens is an individual who operated Economy Motors, LLC d/b/a Gas Hogs.
7. Defendant Kristopher Wolff is an individual that owned and operated Economy Motors,

LLC d/b/a Gas Hogs.

8. Economy Motors, LLC is a domestic limited liability company that has been registered with the Ohio Secretary of State since July 22, 2013.
9. Gas Hogs is a fictitious name registered with the Ohio Secretary of State since September 20, 2018.
10. The principle place of business for Economy Motors, LLC d/b/a Gas Hogs was 3030 Glenhills Way, Cincinnati, Ohio 45238.
11. Defendants Jeremy Skeens and Kristopher Wolff dominated, controlled, directed, and approved the business activities and sales conduct of Economy Motors, LLC d/b/a Gas Hogs at the time of the violations set forth in this Complaint and caused, personally participated in, or ratified the acts and practices of Economy Motors, LLC d/b/a Gas Hogs, as described in this Complaint.
12. Defendants were at all times relevant to this action engaged in the business of soliciting, promoting, purchasing, selling, financing and collecting the proceeds of the sales of used motor vehicles from their location in Cincinnati to consumers residing in Hamilton and other Ohio counties.
13. Defendants, operating under the name Economy Motors, LLC d/b/a Gas Hogs, solicited individual consumers to enter into consumer transactions, specifically for the sale of used motor vehicles.
14. At all relevant times hereto, Defendants held license #UD020349 issued by the State of Ohio under R.C. 4517.01 *et seq.*, allowing them to engage in the business of displaying or selling at retail or wholesale used motor vehicles.

15. At all relevant times hereto, Defendants displayed and sold used motor vehicles at the Economy Motors, LLC d/b/a Gas Hogs location at 3030 Glenhills Way, Cincinnati, Ohio 45238.
16. Defendants failed to file applications for certificate of title within Thirty (30) days after the assignment of delivery of motor vehicles.
17. Defendants failed to obtain certificates of title on or before the Fortieth (40th) day after the sale of motor vehicles.
18. Title Defect Recision consumer claims totaling \$18,820.54 thus far have been paid from the Title Defect Recision Fund, administered by the Ohio Attorney General's Office, after Defendants failed to obtain certificates of title on or before the Fortieth (40th) day after the sale of motor vehicles.
19. R.C. 4505.181 requires that a dealer post a bond in an amount not less than \$25,000 after the Attorney General has paid a retail purchaser of the dealer from the Title Defect Recision Fund.
20. After a payout was made from the Title Defect Recision Fund, Defendants continued to operate without posting a bond.

CAUSE OF ACTION
VIOLATIONS OF THE CERTIFICATE OF MOTOR VEHICLE TITLE ACT

21. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs One through Twenty-one (1-21) of this Complaint.
22. Defendants engaged in unfair and deceptive acts and practices in violation of the CSPA, R.C. 1345.02 by failing to file applications for certificates of title within Thirty (30) days

after the assignment of delivery of motor vehicles as required by R.C. 4505.06(A)(5)(b).

23. Defendants committed unfair and deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), by selling motor vehicles to consumers, in the ordinary course of business, and then failing to obtain certificates of title on or before the Fortieth (40th) day after the sale of the motor vehicles as required by R.C. 4505.181(B)(1).
24. Defendants failed to post a bond after the Attorney General paid retail purchasers of the dealer from the Title Defect Recision Fund due to Defendants' failure to deliver titles to purchasers, as required by R.C. 4505.181(A)(2).
25. Such acts or practices have been previously determined by Ohio courts to violate the CSPA. Defendants committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

- A. ISSUE A PERMANENT INJUNCTION, pursuant to R.C. 1345.07(A)(2), enjoining Defendants, doing business under their own names or any other name, their agents, representatives, salesmen, employees, successors, or assigns, and all persons acting in concert and participation with them, directly or indirectly, from committing any unfair, deceptive, or unconscionable acts or practices that violate the CSPA or the Certificate of Motor Vehicle Title Act including, but not limited to, violating the specific provisions alleged to have been violated herein.

- B. DECLARE that each act or practice complained of herein violates the CSPA and the Certificate of Motor Vehicle Title Act, R.C. 4505.01 et seq., in the manner set forth in this Complaint.
- C. ORDER Defendants to pay damages to all consumers injured by Defendants' unfair or deceptive acts or practices and Defendants' motor vehicle title violations.
- D. ORDER Defendants liable for reimbursement to the Title Defect Recision Fund for funds expended to resolve title defects caused by Defendants' motor vehicle title violations.
- E. ASSESS, FINE, AND IMPOSE upon Defendants a civil penalty of Twenty-Five Thousand Dollars (\$25,000.00) for each of the appropriate unfair or deceptive acts alleged in the Complaint, pursuant to R.C. 1345.07(D).
- F. ISSUE AN INJUNCTION prohibiting Defendants from engaging in business as suppliers in any consumer transaction in the State of Ohio until such time as they have satisfied all monetary obligations ordered by this Court, and any other court in Ohio, in connection with consumer transactions.
- G. Order that Defendants Jeremy Skeens and Kristopher Wolff be prohibited from applying for or maintaining an auto dealer or salesperson license under Chapter 4517 of the Revised Code.
- H. ORDER Defendants to pay all court costs.
- I. GRANT Plaintiff its costs in bringing this action, including, but not limited to, the costs of collecting on any judgment awarded.
- J. GRANT such other relief as the Court deems to be just, equitable and appropriate.

Respectfully submitted,

DAVE YOST
Attorney General



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