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**COMMON PLEAS DIVISION**

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**PAVAN PARIKH  
Clerk of Courts  
Hamilton County, Ohio  
CONFIRMATION 1266073**

**STATE OF OHIO EX REL OHIO  
ATTORNEY GENERAL DAVE  
YO  
vs.  
TERRY D HAYNES**

**A 2204687**

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

**PAGES FILED: 7**

**IN THE COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO**

STATE OF OHIO ex rel. )  
ATTORNEY GENERAL )  
DAVE YOST )  
411 Vine Street, 17<sup>th</sup> Fl. )  
Cincinnati, Ohio 45202 )

Case No:

Judge:

Plaintiff,

v.

TERRY D. HAYNES, individually and )  
d/b/a Queen City Appliance, A Plus )  
Appliance Repair, and Certified )  
Appliance Repair )  
6206 Bridgetown Rd. )  
Cincinnati, Ohio 45248 )

**COMPLAINT AND REQUEST FOR  
DECLARATORY JUDGMENT,  
INJUNCTIVE RELIEF, CONSUMER  
RESTITUTION, CIVIL PENALTIES  
AND OTHER APPROPRIATE RELIEF**

and

AMY N. GARCIA, individually and )  
d/b/a Queen City Appliance, A Plus )  
Appliance Repair, and Certified )  
Appliance Repair )  
6206 Bridgetown Rd. )  
Cincinnati, Ohio 45248 )

Defendants. )

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**JURISDICTION AND VENUE**

1. Plaintiff, State of Ohio, by and through its counsel, the 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 him by R.C. 1345.01 *et seq.*

2. The actions of Terry D. Haynes and Amy N. Garcia (“Defendants”), hereinafter described, have occurred in Hamilton and other counties in the State of Ohio and, as set forth below, are in violation of the Consumer Sales Practices Act (“CSPA”), R.C. 1345.01 *et seq.*, and its Substantive Rules, Ohio Administrative Code (“O.A.C.”) 109:4-3-01 *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)(1) and (3), in that Hamilton County is where Defendants reside and where Defendants conducted some of the transactions complained of herein.

#### **DEFENDANTS**

5. Defendant Terry D. Haynes is a natural person residing at 6206 Bridgetown Rd., Cincinnati, Ohio 45248.
6. Defendant Amy N. Garcia is a natural person residing at 6206 Bridgetown Rd., Cincinnati, Ohio 45248.
7. Defendants conducted business using the fictitious business names Queen City Appliance, A Plus Appliance Repair, and Certified Appliance Repair, which Defendants failed to register with the Ohio Secretary of State.