

IN THE COURT OF COMMON PLEAS
LICKING COUNTY, OHIO

STATE OF OHIO, ex rel.
ATTORNEY GENERAL
DAVE YOST
30 East Broad St., 14th Floor
Columbus, Ohio 43215

Plaintiff,

v.

OHIO LUXURY IMPORTS LLC
c/o Renato Jovanovski, statutory agent
133 Radio City Blvd.
Columbus, Ohio 43235

and

RENATO JOVANSKI
133 Radio City Blvd.
Columbus, Ohio 43235

Defendants.

CASE NO. 25CV00630

JUDGE WDB

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

CLERK COMMON
PLEAS COURT
LICKING CO. OHIO
2025 APR 23 AM 10:40
OLIVIA C. PARKINSON
CLERK

JURISDICTION

1. Plaintiff, State of Ohio, by and through 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 the Ohio 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.*
2. The actions of Defendants Ohio Luxury Imports LLC and Renato Jovanovski, hereinafter described, have occurred in the State of Ohio, Licking County and other counties, and, as set forth below, are in violation of the 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 Defendants operated their business from and engaged in some of the transactions complained of herein in Licking County, Ohio.

DEFENDANTS

5. Ohio Luxury Imports LLC ("OLI") is a domestic limited liability company conducting business in Licking County and other counties in the State of Ohio with its principal place of business previously located at 8934 E. Main Street, Reynoldsburg, Ohio 43068.
6. Defendant OLI at all relevant times was a licensed used motor vehicle dealer, operating under a permit issued by the Ohio Bureau of Motor Vehicles, permit number UD023740 allowing it to engage in the business of displaying or selling at retail or wholesale used motor vehicles.
7. Defendant OLI is currently out of business.
8. On information and belief, Defendant Renato Jovanovski is an individual whose address is 133 Radio City Blvd., Columbus, Ohio 43235.
9. Defendant Jovanovski is the principal owner of Defendant OLI and dominated, controlled and directed the business activities and sales conduct of Defendant OLI, exercised the authority to establish, implement or alter the policies of Defendant OLI, and committed, allowed, directed, ratified or otherwise caused the following unlawful acts to occur.
10. Defendants, as described below, 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” either directly or indirectly, by offering for sale, selling or financing the purchase of used motor vehicles to “consumers” for purposes that were primarily for personal, family, or household use, as those terms are defined in R.C. 1345.01(A), (C), and (D).

STATEMENT OF FACTS

11. 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 to consumers residing in Licking and other Ohio counties.
12. Defendants solicited individual consumers to enter into consumer transactions, specifically for the sale of used motor vehicles.
13. In some instances, the Defendants did not have physical possession of the titles and/or the vehicles were not titled to the Defendants on the dates the vehicles were sold to consumers.
14. Defendants failed to file applications for certificates of title within thirty days after the assignment or delivery of motor vehicles.
15. Defendants failed to obtain certificates of title on or before the fortieth day after the sale of motor vehicles.
16. As a result of the Defendants’ conduct, consumers were unable to obtain certificates of title to their used motor vehicles and filed complaints with the Ohio Attorney General.
17. The Ohio Attorney General made payouts from the Title Defect Recision (“TDR”) Fund for the Defendants’ failure to transfer title. As of the date of the filing of this Complaint, the Ohio Attorney General has paid \$71,858.38 from the TDR fund for Defendants’ failure to transfer title.

18. Defendants failed to post a surety bond in an amount of no less than \$25,000 with the Ohio Attorney General's Office after funds had been paid from the TDR Fund within the past three years as required by R.C. 4505.181(A)(2).

CAUSE OF ACTION:
VIOLATIONS OF THE CONSUMER SALES PRACTICES ACT AND
CERTIFICATE OF MOTOR VEHICLES ACT

19. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in the preceding paragraphs of this Complaint.
20. Defendants engaged in unfair and deceptive acts and practices in violation of R.C. 1345.02(A), by failing to file applications for certificates of title within thirty days after the assignment or delivery of motor vehicles as required by R.C. 4505.06(A)(5)(b).
21. Defendants engaged in unfair and deceptive acts and practices in violation of 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 day after the sale of the motor vehicles as required by R.C. 4505.181(B)(1).
22. Defendants engaged in unfair and deceptive acts and practices in violation of R.C. 1345.02(A), by failing to post a surety bond in an amount of no less than \$25,000 with the Ohio Attorney General's Office after funds had been paid from the TDR Fund within the past three years as required by R.C. 4505.181(A)(2).
23. Such acts or practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 *et seq.* Defendants committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

PRAYER FOR RELIEF

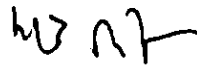
WHEREFORE, Plaintiff respectfully prays that this Court:

- A. ISSUE A DECLARATORY JUDGMENT declaring that each act or practice described in Plaintiff's Complaint violates the CSPA, R.C. 1345.01 *et seq.*, and the Certificate of Motor Vehicle Title Act, R.C. 4505.01 *et seq.*, in the manner set forth in this Complaint.
- B. ISSUE PERMANENT INJUNCTIVE RELIEF enjoining Defendants and any officers, agents, representatives, salespeople, employees, successors and assigns and all persons acting in concert or participating with them, directly or indirectly, from engaging in the acts and practices of which Plaintiff complains and from further violating the CSPA, R.C. 1345.01 *et seq.*, and the Certificate of Motor Vehicle Title Act, R.C., 4505.01 *et seq.*
- C. ORDER the Defendants, pursuant to R.C. 1345.07, liable for reimbursement to all consumers found to have been damaged by the Defendants' unfair and deceptive acts and practices, and motor vehicle title violations.
- D. ORDER the Defendants, pursuant to R.C. 1345.52, liable for payment to the TDR Fund for funds expended to resolve title defects caused by the Defendants' motor vehicle title violations.
- E. ASSESS, FINE, AND IMPOSE upon Defendants a civil penalty of \$25,000.00 for each of the appropriate unfair and deceptive acts alleged in the Complaint, pursuant to R.C. 1345.07(D).
- F. ORDER that the Defendants be enjoined from engaging in consumer transactions as Suppliers in the State of Ohio until they have satisfied all restitution, civil penalties, and court costs.

- G. ORDER that the Defendants be prohibited from maintaining, renewing or applying for an auto dealer license under Chapter 4517 of the Revised Code.
- H. GRANT Plaintiff its costs in bringing this action, including, but not limited to, the costs of collecting on any judgment awarded.
- I. ORDER the Defendants to pay all court costs.
- J. GRANT such other relief as the Court deems to be just, equitable and appropriate.

Respectfully Submitted,

DAVE YOST
Ohio Attorney General



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