

IN THE COURT OF COMMON PLEAS

FRANKLIN COUNTY, OHIO

STATE OF OHIO ex rel.)	CASE NO.
OHIO ATTORNEY GENERAL)	
MICHAEL DEWINE)	JUDGE:
30 E. Broad Street, 14th Floor)	
Columbus, Ohio 43215)	
)	
Plaintiff,)	<u>COMPLAINT AND REQUEST</u>
v.)	<u>FOR DECLARATORY</u>
)	<u>JUDGMENT, INJUNCTIVE</u>
WILLIAM CAMERON, individually)	<u>RELIEF, CONSUMER</u>
and dba CAMERON HOME)	<u>RESTITUTION, AND</u>
REMODELING)	<u>CIVIL PENALTIES</u>
232 Union Street, Apt. C)	
Lancaster, OH. 43130)	
)	
Defendant.)	

JURISDICTION AND VENUE

1. Plaintiff, State of Ohio, by and through Attorney General Michael DeWine, 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, R.C. 1345.01 et seq.
2. The actions of Defendant William Cameron, hereinafter described, have occurred in Franklin County and other counties in the State of Ohio, and as set forth below are in violation of the Consumer Sales Practices Act, R.C. 1345.01 et seq. ("CSPA") and its Substantive Rules.
3. Jurisdiction over the subject matter of this action lies with this Court pursuant to the CSPA, R.C. 1345.04.

4. This Court has venue to hear this case pursuant to Ohio Civ. R. 3(B)(3) in that some of the transactions complained of herein, and out of which this action arose, occurred in Franklin County, Ohio.

DEFENDANT

5. Defendant William Cameron is a natural person who is currently incarcerated at the Madison Correctional Institution, 1851 OH-56, London, Ohio 43140.
6. On information and belief, Defendant Cameron was engaged in the business of supplying, promoting, and selling consumer goods, whereby Defendant caused the unlawful acts and practices enumerated in this Complaint.
7. Defendant is a "supplier" as he was, at all times relevant herein, engaged in the business of effecting "consumer transactions" either directly or indirectly by soliciting and selling goods or services to consumers in the State of Ohio for purposes that were primarily personal, family or household in nature, as those terms are defined in the CSPA, R.C. 1345.01(A), (C), and (D).

STATEMENT OF FACTS

8. Defendant solicited individuals to enter into consumer transactions for various products including but not limited to farm equipment, event tickets, and car motors.
9. Defendant contacted consumers who were advertising on Craigslist and led them to believe that he had the item(s) the consumers were looking to purchase.
10. Defendant conducted business on Craigslist under his name, William Cameron, and under the unregistered name of "Cameron Home Remodeling."

11. Defendant promised prompt delivery of the goods and directed consumers to send payments for the goods via Western Union, Green Dot, MoneyGram, MoneyPak, Walmart Money Service, or USPS Money Order.
12. Defendant failed to deliver the purchased goods and failed to make refunds to consumers.
13. Defendant entered into consumer transactions for the sale of goods knowing of the inability of consumers to receive substantial benefits from the subject of the transactions.
14. Defendant sold goods to consumers without taking reasonable steps to acquire the goods he offered for sale.
15. Defendant advertised and sold goods without having ownership or possession of the goods and failed to disclose to buyers that the goods were not in his possession.
16. On several occasions, Defendant instructed consumers to send full payment before delivery and, after receiving the agreed upon amount, Defendant told consumers that he needed an additional payment before sending the goods.
17. Defendant used several different numbers to contact consumers, including:
 - a. (614) 359-2283
 - b. (614) 813- 9889
 - c. (614) 400-5669
 - d. (614) 435-5023
 - e. (740) 497-9821
18. Defendant used several different email accounts to contact consumer, including:
 - a. Cameron51@yahoo.com
 - b. Cameronwilliam51@yahoo.com

c. Cameronwilliams@yahoo.com

19. Defendant used several different street addresses to conduct his business, including:
- a. 326 ½ S. Columbus Street, Lancaster, Ohio 43130
 - b. 2305 Cleveland Avenue, Columbus, Ohio 43211
 - c. 3751 Sunbury Road, Columbus, Ohio 43224
20. On at least one occasion, Defendant contacted a consumer using the alias "William Roberts."

PLAINTIFF'S FIRST CAUSE OF ACTION:
VIOLATIONS OF THE CONSUMER SALES PRACTICES ACT

COUNT ONE

FAILURE TO DELIVER

21. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs One through Twenty (1-20) of this Complaint.
22. Defendant has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A) and the Ohio Admin. Code 109:4-3-09(A), by accepting payments from consumers, promising delivery dates for goods, failing to deliver the goods, and failing to return payments to the consumers.

COUNT TWO

SELLING WITHOUT TAKING REASONABLE STEPS TO ACQUIRE GOODS

23. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs One through Twenty (1-20) of this Complaint.

24. Defendant has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), by selling consumer goods without taking reasonable steps to acquire the goods necessary to complete the transactions.
25. Such acts or practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 et seq. Defendant committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

COUNT THREE

**ADVERTISING AND SELLING WITHOUT POSSESSION OF THE GOODS AND
FAILURE TO DISCLOSE THE LACK OF POSSESSION**

26. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs One through Twenty (1-20) of this Complaint.
27. Defendant committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), by advertising and selling goods for sale without having ownership or possession of the goods and failing to disclose to buyers that the goods were not in the Defendant's possession.
28. Such acts or practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 et seq. Defendant committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

COUNT FOUR

UNCONSCIONABLE ACTS OR PRACTICES

29. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs One through Twenty (1-20) of this Complaint.

30. Defendant committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.03(A), as set forth in R.C. 1345.03(B)(3), by entering into consumer transactions knowing of the inability of the consumers to receive substantial benefits from the subject of the consumer transaction.
31. Defendant committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.03(A), as set forth in R.C. 1345.03(B)(5), by entering into consumer transactions on terms he knew were substantially one-sided in his favor.
32. Such acts or practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 et seq. Defendant 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 the acts or practices described in Plaintiff's Complaint violate the CSPA in the manner set forth herein.
- B. **ISSUE PERMANENT INJUNCTIVE RELIEF**, pursuant to R.C. 1345.07, enjoining Defendant under his own name or any other name, and all persons acting on behalf of Defendant directly or indirectly, through any corporate or private device, partnership or association, jointly and severally, from engaging in the acts or practices of which Plaintiff complains and from further violating the CSPA, R.C. 1345.01 et seq.
- C. **ISSUE PERMANENT INJUNCTIVE RELIEF** enjoining Defendant from acting as a "supplier" in the State of Ohio as that term is defined in R.C. 1345.01(C).
- D. **ORDER** Defendant, pursuant to R.C. 1345.07(B), to pay restitution to all consumers damaged by Defendant's unlawful acts or practices.

- E. ASSESS, FINE AND IMPOSE upon Defendant a civil penalty of Twenty-Five Thousand Dollars (\$25,000.00) for each separate and appropriate violation described herein, pursuant to R.C. 1345.07(D).
- F. GRANT the Ohio Attorney General his costs in bringing this action.
- G. ORDER Defendant to pay all court costs.
- H. GRANT such other relief as the Court deems to be just, equitable and appropriate.

Respectfully submitted,

MICHAEL DEWINE
Attorney General

/s/ Hallie Saferin
HALLIE C. SAFERIN (0093467)
Assistant Attorney General
Consumer Protection Section
30 East Broad Street, 14th Floor
Columbus, Ohio 43215-3428
Phone: (614) 466-9529
Facsimile: (877) 384-0848
hallie.saferin@ohioattorneygeneral.gov

Counsel for Plaintiff State of Ohio