

IN THE COURT OF COMMON PLEAS
MAHONING COUNTY, OHIO



STATE OF OHIO, ex rel.
MICHAEL DEWINE
ATTORNEY GENERAL
615 W. SUPERIOR, 11TH FL.
Cleveland, Ohio 44113-1899

Plaintiff,

v.

GEORGE N. KRINOS, dba
WINDOWS, DOORS, KITCHENS,
AND MORE CONSTRUCTION CO.
657 CHAPEL LANE
CAMPBELL, OHIO 44512

Defendant

CASE NO. 17CV1273

JUDGE Durkin

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

JURISDICTION

1. Plaintiff, State of Ohio, by and through the Attorney General of Ohio, 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. (the Ohio Consumer Sales Practices Act) (hereafter "CSPA").

2. The actions of Defendant George Krinos dba Windows Doors Kitchens and More Co, hereinafter described as set forth below, are in violation of the CSPA, R.C. 1345.01 et seq., and its Substantive Rules O.A.C. 109:4-3-01 et seq.

3. This Court has jurisdiction over the subject matter of this action pursuant to R.C. 1345.04 of the CSPA.

4. This Court has venue to hear this case pursuant to Ohio Civ. R. 3(B)(1) and (2), in that Defendant resides in, and has his principal place of business within Mahoning County, Ohio.

STATEMENT OF FACTS

5. Defendant George N. Krinos is a natural person whose last known address is 657 Chapel Lane, Campbell, Ohio 44512.

6. Windows, Doors, Kitchens and More Construction Co. is a business registered as a fictitious name for “ARI” with Ohio’s Secretary of State on October 13, 2015. The “ARI” referenced is not found to be a business name registered to Krinos, but is instead believed to refer to Alpha Renovations Inc., which was registered to Defendant Krinos since July 7, 2014. GN Krinos is the Agent of Alpha Renovations, Inc.

7. The registration form on the Ohio Secretary of State’s website reflecting the registration of the fictitious name of Windows, Doors, Kitchens and More Construction Co. is signed by “George Nicholis.” It is believed that GN Krinos stands for George Nicholis Krinos, and that Defendant Krinos has used the fictitious moniker “George Nicholis” in his business dealings as Windows, Doors, Kitchens and More Construction Co.

8. Defendant Krinos operated “Windows, Doors, Kitchens and More” at 741 McClurg Rd. Dock D, Youngstown, Ohio until approximately 2016.

9. Defendant is a “supplier,” as that term is defined in R.C. 1345.01(C), as Defendant engaged in the business of effecting “consumer transactions” by offering home

improvement goods and services for sale to individuals for purposes which were primarily personal, family or household within the meaning of R.C. 1345.01(A) and (D).

10. Defendant has solicited for and contracted with consumers to do home improvement services such as roofing and home remodel/repair upon the consumers' residences. Defendant then failed to complete the terms of the contracts, failed to properly or completely install home improvement projects, and performed shoddy workmanship in those parts of the construction that were performed.

11. At all times herein, consumers relied upon statements and misrepresentations made by Defendant Krinos, who knew or should have known of the acts, or failure to act, and who allowed, caused or ratified such acts and practiced described above.

PLAINTIFF'S CAUSES OF ACTION

COUNT I **FAILURE TO DELIVER**

12. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in Paragraphs One through Eleven (1-11) of this Complaint.

13. Defendant has committed unfair and deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A) and the O.A.C. 109:4-3-09, by accepting money from consumers for goods and services and failing to make full delivery or a timely refund.

COUNT II **PERFORMING SUBSTANDARD WORK**

14. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in Paragraphs One through Thirteen (1-13) of this Complaint.

15. Defendant has committed unfair and deceptive acts and practices in violation of the CSPA, R.C. 1345.02(A) by performing substandard work and then failing to correct such work. 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

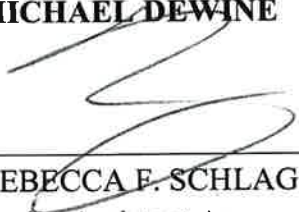
WHEREFORE, Plaintiff respectfully requests that this Court:

1. **ISSUE** a declaratory judgment declaring that each act or practice complained of herein violates the CSPA in the manner set forth in the Complaint.
2. **ISSUE** a permanent injunction enjoining Defendant, under these or any other names, his agents, servants, representatives, salesmen, employees, successors and assigns and all persons acting in concert or participate with Defendant, directly or indirectly, from engaging in the acts or practices of which Plaintiff complains and from any further violations of the CSPA, R.C. 1345.01 et seq.;
3. **IMPOSE** upon Defendant civil penalties in the amount of Twenty-Five Thousand Dollars (\$25,000.00) for each separate and appropriate violation of the CSPA pursuant to R.C. 1345.07(D);
4. **ORDER** that all contracts entered into between Defendant and Ohio consumers by unfair or deceptive acts or practices in violation of the CSPA be rescinded with full restitution to the consumers;

5. As a means of ensuring compliance with this Court's Order and with the consumer protection laws of Ohio, **ORDER** Defendant, his successors or assigns, under these or any other names, to maintain in his possession and control for a period of five (5) years all business records relating to Defendants' solicitation or effectuation of business in Ohio and to permit the Ohio Attorney General or his representative, upon reasonable twenty-four (24) hour notice, to inspect and/or copy any and all of said records and further **ORDER** that copies of such records be provided at Defendant's expense to the Ohio Attorney General upon request of the Ohio Attorney General or his representatives;
6. **GRANT** Plaintiff his costs in bringing this action;
7. **ORDER** Defendants to pay all court costs;
8. **GRANT** such further relief as justice and equity require.

Respectfully submitted,

**ATTORNEY GENERAL
MICHAEL DEWINE**



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