

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

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

Plaintiff,

V.

MAID IN COLUMBUS 614, LLC
c/o Legalinc Corporate Services, Inc.,
Statutory Agent
1991 Cocker Road, Suite 600A
Westlake, OH 44145

and

KAYLA REYES a/k/a KAYLA PADILLA
d/b/a 614 MAID BRIGADE; and
d/b/a HOME SWEET HOME CLEANING
SERVICES
6060 O'Sweeney Lane
Dublin, OH 43016

Defendants.

Case No:

Judge:

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

JURISDICTION AND VENUE

1. Plaintiff, State of Ohio, by and through its counsel, Ohio Attorney General 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 Defendant Maid in Columbus 614, LLC and Defendant Kayla Reyes (aka Kayla Padilla) d/b/a 614 Maid Brigade and/or d/b/a Home Sweet Home Cleaning Services (collectively, "Defendants"), hereinafter described, have occurred in Franklin County and

other counties in the State of Ohio and, as set forth herein, are in violation of the Consumer Sales Practices Act (“CSPA”), R.C. 1345.01, *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).

DEFENDANT

5. Defendant Maid in Columbus 614, LLC is a domestic limited liability company registered with the Ohio Secretary of State on or about September 30, 2020.
6. Defendant Reyes is an individual with a last known address at 6060 O’Sweeney Lane, Dublin, OH 43016.
7. Defendant Reyes, at all times pertinent hereto, controlled and directed the business activities and sales conduct of Defendant Maid in Columbus 614, LLC, causing, personally participating in, or ratifying the acts and practices of the same, including the conduct giving rise to the violations described herein.
8. Defendants are “suppliers,” as that term is defined in R.C. 1345.01(C), as they engaged in the business of effecting and soliciting “consumer transactions” by soliciting individual consumers in the State of Ohio to enter into transactions for cleaning services for purposes that were primarily personal, family or household within the meaning specified in R.C. 1345.01(A).

STATEMENT OF FACTS

9. Defendants, at all times relevant hereto, solicited individual consumers to enter into consumer transactions for residential cleaning services.

10. Defendants accepted deposits and/or payments from consumers for residential cleaning services, but in some instances failed to provide the services when represented.
11. Despite consumers' demands to do so, Defendants have not refunded consumer deposits and/or payments for the residential cleaning services that Defendants failed to provide.
12. Although Defendant Reyes in some instances operated under the names 614 Maid Brigade and Home Sweet Home Cleaning Services, Defendant Reyes did not register or report said trade names with the Ohio Secretary of State.

CAUSE OF ACTION: VIOLATIONS OF THE CONSUMER SALES PRACTICES ACT
COUNT I - FAILURE TO DELIVER

13. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs 1 through 13 of this Complaint.
14. Defendants committed unfair or deceptive acts or practices in violation of the Failure to Deliver Rule, O.A.C. 109:4-3-09(A), and the CSPA, R.C. 1345.02(A), by accepting money from consumers for services and then permitting more than eight weeks to elapse without providing the services ordered, making a full refund, advising the consumers of the duration of an extended delay and offering to send a refund within two weeks if so requested, or furnishing similar goods or services of equal or greater value as a good faith substitute.

COUNT II – FAILURE TO REGISTER WITH OHIO SECRETARY OF STATE

15. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs 1 through 15 of this Complaint.
16. Defendant Reyes committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A) and R.C. 1329.01 by operating under the trade names “614 Maid Brigade”

and “Home Sweet Home Cleaning Services” while failing to register or report either with the Ohio Secretary of State.

17. The acts or practices described above have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 *et seq.* Defendant Reyes 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 DECLARATORY JUDGMENT that each act or practice complained of herein violates the CSPA and its Substantive Rules, O.A.C. 109:4-3-01 *et seq.*, in the manner set forth in the Complaint.
- B. ISSUE A PERMANENT INJUNCTION enjoining the Defendants, doing business under their own names or any other names, together with their officers, partners, agents, representatives, salespersons, employees, successors or assigns, and all persons acting in concert and participation with them directly or indirectly through any corporate device, partnership or association, from engaging in the acts and practices of which Plaintiff complains and from further violating the CSPA, R.C. 1345.01 *et seq.*, and its Substantive Rules, O.A.C. 109:4-3-01 *et seq.*
- C. ORDER Defendants, pursuant to R.C. 1345.07(B), to pay damages to all consumers injured by the conduct of the Defendants as set forth in this Complaint.
- D. ASSESS, FINE and IMPOSE upon Defendants a civil penalty of up to \$25,000.00 for each separate and appropriate violation of the CSPA described herein pursuant to R.C. 1345.07(D).

- E. GRANT Plaintiff its costs incurred in bringing this action, including but not limited to, the cost of collecting on any judgment awarded.
- F. ORDER Defendants to pay all court costs associated with this matter.
- G. ORDER Defendants be enjoined from engaging in consumer transactions as a supplier in the State of Ohio until Defendants have satisfied all monetary amounts ordered to be paid in this action.
- H. GRANT such other relief as the court deems to be just, equitable, and appropriate.

Respectfully submitted,

DAVE YOST
Attorney General

/s/ W. Travis Garrison
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