



**NAILAH K. BYRD  
CUYAHOGA COUNTY CLERK OF COURTS  
1200 Ontario Street  
Cleveland, Ohio 44113**

**Court of Common Pleas**

**New Case Electronically Filed: COMPLAINT  
October 6, 2025 13:16**

By: KEVIN R. WALSH 0073999

Confirmation Nbr. 3636370

STATE OF OHIO, EX REL ATTORNEY GENERAL  
DAVE YOST

CV 25 125867

vs.

EXQUISITE EVENT CENTER, LLC, ET AL

**Judge: SHERRIE MIDAY**

**Pages Filed: 6**

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

STATE OF OHIO ex rel. )  
ATTORNEY GENERAL )  
DAVE YOST ) Case No:  
30 E. Broad St., 14<sup>th</sup> Floor )  
Columbus, Ohio 43215 )  
Plaintiff, ) Judge:  
v. )  
EXQUISITE EVENT CENTER, LLC, ) COMPLAINT AND REQUEST FOR  
c/o INC Authority RA, Statutory Agent ) DECLARATORY JUDGMENT,  
1201 Dublin Road, Suite 603 ) INJUNCTIVE RELIEF, CONSUMER  
Columbus, OH 43215 ) RESTITUTION, CIVIL PENALTIES,  
 ) AND OTHER APPROPRIATE RELIEF  
 )  
JAYLIN L. HINES MITCHELL )  
14710 Lisa Drive )  
Maple Heights, OH 44137 )  
and )  
JAHLA I. SMITH )  
4901 East 85<sup>th</sup> Street )  
Cleveland, OH 44125 )  
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 the Consumer Sales Practices Act, ("CSPA") R.C. 1345.01 *et seq.*

2. The actions of Exquisite Event Center, LLC, Jaylin L. Hines Mitchell and Jahla I. Smith, individually and doing business as Exquisite Event Center, LLC (“Defendants”), hereinafter described, have occurred in Cuyahoga County and, as set forth below, are in violation of the CSPA, R.C. 1345.01 *et seq.*, and its Substantive Rules, Ohio Adm.Code 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)(3) in that Cuyahoga County is the county where Defendants conducted activity that gave rise to the claims for relief.

#### **DEFENDANTS**

5. Defendant Exquisite Event Center, LLC (“Exquisite”) is a limited liability company that was registered with the Ohio Secretary of State on July 5, 2023.
6. Defendant Jaylin L. Hines Mitchell (“Mitchell”) is a natural person residing at 14710 Lisa Drive, Maple Heights, OH 44137.
7. Defendant Jahla I. Smith (“Smith”) is a natural person residing at 4901 East 85<sup>th</sup> Street, Cleveland, OH 44125.
8. Defendants are “suppliers,” as they engaged in the business of effecting “consumer transactions” by soliciting “consumers” either directly or indirectly for a service, including party center rentals, for purposes that were primarily for personal, family, or household use, as those terms are defined by R.C. 1345.01(A), (C), and (D).
9. Defendants Mitchell and Smith at all times pertinent hereto, controlled and directed the business activities and sales conduct of Defendant Exquisite causing, personally participating

in, or ratifying the acts and practices of Defendant Exquisite including the conduct giving rise to the violations described herein.

### **STATEMENT OF FACTS**

10. Defendant Exquisite offered event center rentals for large group events such as wedding showers and baby showers.
11. Defendants' business operated out of a property located at 4753 Northfield Road, Units 6, 7 and 8, North Randall, OH 44128.
12. Defendants Mitchell and Smith executed a Commercial Lease agreement on behalf of Defendant Exquisite in order to occupy the event center space at 4753 Northfield Road, Units 6, 7 and 8, North Randall, OH 44128.
13. Defendant Mitchell signed the Articles of Organization filed with the Ohio Secretary Of State on behalf of Defendant Exquisite.
14. Defendants Mitchell and Smith met with consumers at the event center venue to advertise the facility and, in some instances, enter into contracts for rental of the space.
15. Defendants represented to consumers that the event center would be made available to the consumers at the agreed date and time for the purpose of hosting large group parties such as wedding showers and baby showers.
16. Defendant Smith accepted down payments for the party center rentals from consumers.
17. Defendants represented to consumers that they would provide the event center venue at a certain date and time and then failed to provide such services at the time promised.
18. Defendants have refused to refund consumers' deposits or payments despite consumers' requests for refunds.

19. In some instances, Defendants Mitchell and Smith offered to issue a refund of consumers' deposits and then failed to do so.
20. Defendants' failure to provide event center rental services as were contracted for has resulted in harm to consumers.

**PLAINTIFF'S CAUSE OF ACTION: VIOLATIONS OF THE CSPA**

**COUNT 1 - FAILURE TO DELIVER**

21. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in the preceding paragraphs of this Complaint.
22. Defendants committed unfair or deceptive acts or practices in violation of the Failure to Deliver Rule, Ohio Adm.Code 109:4-3-09(A), and the CSPA, R.C. 1345.02(A), by accepting money from consumers for services and then permitting eight weeks to elapse without making delivery of 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 services of equal or greater value as a good faith substitute.

**COUNT 2 – MISREPRESENTATION**

23. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in the preceding paragraphs of this Complaint.
24. Defendants committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), by misrepresenting the status of consumers' refunds or representing to consumers that Defendants would provide refunds and then failing to do so.

25. The acts or practices described above 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 made 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, R.C. 1345.01 *et seq.*, and its Substantive Rules, Ohio Adm.Code 109:4-3-01 *et seq.* in the manner set forth in the Complaint.
- B. ISSUE A PERMANENT INJUNCTION enjoining the Defendants, their agents, employees, successors or assigns, and all persons acting in concert and participation with them, directly or indirectly, through any corporate device, partnership, or other association, under these or any other names, 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, Ohio Adm.Code 109:4-3-01 *et seq.*
- C. ISSUE A PERMANENT INJUNCTION enjoining Defendants from engaging in business as a supplier in any consumer transaction in the State of Ohio until such time as they have satisfied all monetary obligations ordered by this Court, and any other Court in Ohio in connection with a consumer transaction.
- D. ORDER Defendants, pursuant to R.C. 1345.07(B), to pay damages to all consumers injured by the Defendants' conduct as set forth in this Complaint.
- E. 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).

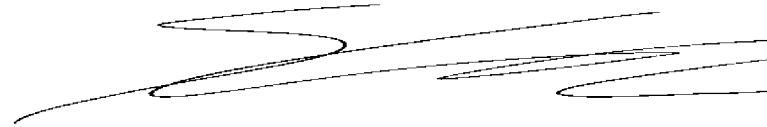
F. GRANT Plaintiff its costs incurred in bringing this action, including but not limited to, the cost of collecting on any judgment awarded.

G. ORDER Defendants to pay all court costs associated with this matter.

H. GRANT such other relief as the court deems to be just, equitable, and appropriate.

Respectfully submitted,

DAVE YOST  
Attorney General



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