



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

Court of Common Pleas

New Case Electronically Filed: COMPLAINT
June 2, 2026 09:06

By: REBECCA F. SCHLAG 0061897

Confirmation Nbr. 3870971

STATE OF OHIO, EX REL. ATTORNEY GENERAL
DAVE YOST

CV 26 139812

vs.

LONG BROTHER'S CAR CO., INC

Judge: ANTONIO S. NICHOLSON

Pages Filed: 5

Defendant conducted activities that gave rise to Plaintiff's claim for relief.

DEFENDANT

5. Defendant is an Ohio corporation with its principal place of business located at 10501 Lorain Ave., Cleveland, Ohio 44111.
6. Defendant 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 Cuyahoga and other Ohio counties.
7. Defendant is a "supplier" as that term is defined in R.C. 1345.01(C) as Defendant was, at all times relevant herein, engaged in the business of effecting or soliciting "consumer transactions" by offering for sale and selling used motor vehicles to individuals for purposes that were primarily personal, family, or household within the meaning specified in R.C. 1345.01(A).

STATEMENT OF FACTS

8. Defendant holds used motor vehicle dealer license UD007520, issued by the Ohio Bureau of Motor Vehicles pursuant to R.C. 4517.01 et seq., allowing it to engage in the business of displaying or selling at retail or wholesale used motor vehicles.
9. Defendant solicited individual consumers to enter into consumer transactions, specifically for the sale and purchase of used motor vehicles.
10. At all relevant times, Defendant displayed and sold used motor vehicles at its Long Brothers Car Co., Inc. dealership located at 10501 Lorain Ave., Cleveland, Ohio 44111.
11. Defendant failed to file applications for certificates of title within 30 days after the assignment or delivery of motor vehicles.
12. Defendant sold consumers motor vehicles that did not have certificates of title issued in the

name of the dealership at the time of sale.

13. Defendant failed to obtain certificates of title on or before the 40th day after the sale of motor vehicles.
14. To date, Title Defect Recision (“TDR”) consumer claims totaling \$4,595 have been paid from the TDR Fund, administered by the Ohio Attorney General’s Office, after the Defendant failed to obtain certificates of title on or before the 40th day after the sale of the motor vehicles.
15. The Ohio Attorney General’s Office took custody of one of the motor vehicles at issue and sold it at auction. That vehicle’s sale at auction recouped \$2,210.00 for the TDR Fund.
16. Therefore, the unrecouped \$2,385.00 remains outstanding and owed to the TDR Fund by Defendant for the Defendant’s failure to transfer titles.
17. Defendant’s dealership location at 10501 Lorain Ave. appears to have been abandoned and is no longer operating.

PLAINTIFF’S CAUSE OF ACTION

Violations of the Certificate of Motor Vehicle Title Act & the CSPA

18. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in the preceding paragraphs of this Complaint.
19. Defendant engaged in unfair and deceptive acts and practices in violation of the CSPA, R.C. 1345.02(A), by failing to file applications for certificates of title within 30 days after the assignment or delivery of motor vehicles as required by R.C. 4505.06(A)(5)(b) of the Certificate of Motor Vehicle Title Act.
20. Defendant engaged in unfair and deceptive acts and practices in violation of the CSPA, R.C. 1345.02(A), by selling consumers motor vehicles that did not have certificates of title

issued in the name of the dealership at the time of the sale and then failing to obtain certificates of title in the name of the consumer purchasers on or before the 40th day after the sale of the motor vehicles as required by R.C. 4505.181(B)(1) of the Certificate of Motor Vehicle Title Act.

21. 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 PERMANENT INJUNCTION, pursuant to R.C. 1345.07(A)(2), enjoining Defendant, doing business under its own name or any other names, and any officers, agents, representatives, salespeople, employees, successors and assigns, and all persons acting in concert or participating with Defendant, directly or indirectly, from committing any unfair, deceptive, or unconscionable acts or practices that violate the CSPA, R.C. 1345.01 et seq., or the Certificate of Motor Vehicle Title Act, R.C. 4505.01 et seq., including, but not limited to, violating the specific provisions alleged to have been violated herein.
- B. DECLARE, pursuant to R.C. 1345.07(A)(1), that each act or practice complained of herein 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.
- C. ORDER Defendant, pursuant to R.C. 1345.07(B), to pay damages to all consumers injured by Defendant's conduct.
- D. ORDER Defendant liable, pursuant to R.C. 1345.52, for payment to the Attorney General's TDR Fund for funds expended to resolve title defects caused by the Defendant's motor

vehicle title violations.

- E. ASSESS, FINE, AND IMPOSE upon Defendant, pursuant to R.C. 1345.07(D), a civil penalty of \$25,000.00 for each of the appropriate unfair and deceptive acts alleged in the Complaint.
- F. ISSUE AN INJUNCTION prohibiting Defendant from engaging in consumer transactions as a supplier in any consumer transaction in the State of Ohio until Defendant has satisfied all monetary obligations ordered by this Court in this case and ordered by this or any other court in Ohio in any other cases in connection with a consumer transaction.
- G. ISSUE A PERMANENT INJUNCTION prohibiting Defendant from maintaining, renewing, or applying for any motor vehicle 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 Defendant to pay all court costs.
- J. GRANT such other relief as the Court deems to be just, equitable, and appropriate.

Respectfully submitted,

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Ohio Attorney General

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