

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

STATE OF OHIO, ex rel.	)	
ATTORNEY GENERAL	)	Case No:
MICHAEL DEWINE	)	
30 East Broad Street, 14 <sup>th</sup> Floor	)	
Columbus, Ohio 43215	)	
	)	
PLAINTIFF,	)	
	)	Judge:
v.	)	
	)	
ADD SOURCE, LLC	)	
PO Box 701	)	<u>COMPLAINT, REQUEST FOR</u>
Portland, OR 97207	)	<u>DECLARATORY AND</u>
	)	<u>INJUNCTIVE RELIEF,</u>
and	)	<u>CONSUMER DAMAGES, CIVIL</u>
	)	<u>PENALTIES, AND OTHER</u>
ADSOURCE, LLC	)	<u>APPROPRIATE RELIEF</u>
PO Box 701	)	
Portland, OR 97207	)	
	)	
and	)	
	)	
24/7 LOCKSMITH ADVERTISING, LLC	)	
PO Box 701	)	
Portland, OR 97207	)	
	)	
and	)	
	)	
YOSSI ASSARAF	)	
4123 SW Corbett Ave.	)	
Portland, OR 97239	)	
	)	
DEFENDANTS.	)	

---

**JURISDICTION AND VENUE**

1. Plaintiff, State of Ohio, by and through counsel, 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 (“CSPA”), R.C. 1345.01, et seq.

2. The actions of Defendants, Add Source, LLC, Adsource, LLC, 24/7 Locksmith Advertising, LLC, and Yossi Assaraf (“Defendants”), hereinafter described, have occurred in the State of Ohio, and as set forth below are in violation of the CSPA, R.C. 1345.01 et seq., and its Substantive Rules.
3. Jurisdiction over the subject matter lies with this Court pursuant to the CSPA, R.C. 1345.01 et seq.
4. The Court has venue to hear this case pursuant to Ohio Civ. R. 3(B)(3), as Defendants conducted activity in this county that gives rise to the claims for relief.

### **DEFENDANTS**

5. Defendants Add Source, LLC (“Add Source”) and AdSource, LLC (“AdSource”) are limited liability companies registered in the State of Oregon with the same mailing address: PO Box 701, Portland, OR 97207. Defendants Add Source and AdSource occasionally do business as “AddSource.”
6. Defendant 24/7 Locksmith Advertising, LLC (“24/7 Locksmith”) is a limited liability company registered in the State of Oregon with a principal place of business at 4505 SW Corbett Ave, Portland, OR 97207.
7. Defendant Yossi Assaraf (“Assaraf”) is an individual and resident of the State of Oregon with an address at 4123 SW Corbett Ave, Portland, OR 97239.
8. Upon information and belief, Defendant Assaraf directed, supervised, approved, formulated, authorized, ratified, benefited from, and/or otherwise participated in the acts

and practices of Defendants Add Source, AdSource and 24/7 Locksmith hereinafter alleged.

9. Defendants are “suppliers” as defined in R.C. 1345.01(C), since Defendants at all times relevant hereto were engaged in the business of effecting consumer transactions either directly or indirectly by soliciting and selling locksmithing goods or services to consumers in the State of Ohio for purposes that were primarily for personal, family or household use, within the meaning specified in R.C. 1345.01(A).

### **STATEMENT OF FACTS**

10. Defendants create and operate numerous websites advertising locksmithing services.

Some of these websites include:

- a. 247-locksmithcolumbus.com
  - b. 247-locksmithcincinnati.com
  - c. 247-locksmithcleveland.com
  - d. dublin-locksmith.com
  - e. ketteringlocksmith.org
  - f. daytonlocksmith.org
  - g. fivestarclevelandlocksmith.com
  - h. worthingtonlocksmith.org
11. Upon information and belief, Defendants create and operate other websites listing Ohio cities that Plaintiff has not been able to identify pre-suit.
12. The websites identified in paragraph 10 above are designed by Defendants to look like they are for locksmithing companies based in the cities they mention. For example, the websites will reference “24/7 Cincinnati Locksmith’s services,” leading consumers to

believe that that particular locksmith company is located in Cincinnati, Ohio, when it is not. Plaintiff has attached examples of these webpages as **Exhibit A**.

13. Defendants also advertise on internet search engines, such as Google. The advertisements are designed to appear when an individual enters searches such as “locksmith in [City]” or “[City] locksmith.”
14. Despite appearing to be local companies, the websites identified in paragraph 10 are not Ohio companies, and in fact are not business entities at all. Instead, when a consumer calls the phone number listed on the website, the call is transferred to a call center outside of Ohio which operated by Defendants. The same call center is used for all of the websites.
15. When a consumer calls, Defendants’ call center sends a referral to a contracted locksmith in the consumer’s area. The call center does not identify itself by using Defendants’ names, and does not disclose that it does not employ the locksmith it sends to the consumer.
16. Some of Defendants’ websites listed in paragraph 10 advertise a price, often of \$19. When the contracted locksmith shows up to assist the consumer, the locksmith charges amounts significantly in excess of the advertised price. Some of Defendants’ websites do disclose that there may be prices in addition the \$19 charge, and list minimum prices for certain services. When the locksmith shows up, however, the locksmith charges significantly more than the minimum prices. Defendants know that the prices listed on their websites are unrealistic. The listed prices induce consumers into using Defendants’ services.

17. The consumer pays the contracted locksmith directly and does not pay Defendants. The contracted locksmith provides a receipt under its name to the consumer, and the consumer is not given any record that mentions Defendants. The contracted locksmith then pays Defendants a portion of the amount the consumer paid the contracted locksmith.
18. Defendants AdSource, LLC, Add Source, LLC, 24/7 Locksmith Advertising, LLC are not registered business names in Ohio.
19. Defendants' websites contain many statements about the quality and characteristics of their services that are not true. Examples of these statements include, but are not limited to: "Dayton Locksmith is located in downtown Dayton," "We're staffed 24 hours a day with the best locksmiths in town," "We've opened thousands of car doors safely," "Kettering Locksmith is located in downtown Kettering," "We've got the best staff of licensed, bonded and insured locksmiths out there," "Great residential services by bonded and insured technicians," "Whenever you need a reliable, local locksmith service – you can rest assured that there is a technician nearby," and "Our locksmiths are licensed and bonded technicians."

### **PLAINTIFF'S CAUSE OF ACTION**

#### **Violations of the Consumer Sales Practices Act**

20. Plaintiff incorporates by reference, as if completely rewritten herein, the allegations set forth in paragraphs One through Nineteen (1-19) of this Complaint.
21. Defendants have engaged in unfair, deceptive and/or unconscionable acts and practices in violation of R.C. §§ 1345.02, 1345.03 and the Substantive Rules, including O.A.C. 109:4-3-03(B) and 109:4-3-10(A), in connection with its solicitation and sale of

locksmithing services by: a) advertising in ways that induced consumers to believe Defendants were companies located in the consumer's city when Defendants were not, b) stating that Defendants' services had sponsorship, approval, performance characteristics, accessories, uses, or benefits that they did not have, c) stating that a specific price advantage for Defendants' transactions existed when it did not, d) securing the first contact with the consumer through deception, and f) failing to register as a foreign corporation or trade name with the Ohio Secretary of State.

22. Such acts and practices 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 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 PERMANENT INJUNCTION** enjoining Defendants Add Source, LLC AdSource, LLC, 24/7 Locksmith Advertising, LLC, and Yossi Assaraf, their agents, representatives, salespeople, employees, successors or assigns and all persons acting in concert or participating with them, directly or indirectly, from engaging in the acts or practices of which Plaintiff complains and from further violating the CSPA, R.C. 1345.01 et seq.
2. **ISSUE A DECLARATORY JUDGMENT** declaring that each act or practice described in Plaintiff's Cause of Action violates the CSPA, R.C. 1345.01 et seq. in the manner set forth therein.
3. **ORDER** Defendants Add Source, LLC AdSource, LLC, 24/7 Locksmith Advertising, LLC, and Yossi Assaraf, pursuant to R.C. 1345.07(B), jointly and severally liable to

reimburse all consumers damaged by their unfair, deceptive, and/or unconscionable acts or practices, including non-economic damages.

4. **ASSESS, FINE, AND IMPOSE** upon Defendants Add Source, LLC AdSource, LLC, 24/7 Locksmith Advertising, LLC, and Yossi Assaraf, jointly and severally, a civil penalty of Twenty Five Thousand Dollars (\$25,000) for each appropriate violation described herein, pursuant to R.C. 1345.07(D).
5. **ORDER**, as a means of insuring compliance with this Court's Order and with the consumer protection laws of Ohio, that Defendants Add Source, LLC AdSource, LLC, 24/7 Locksmith Advertising, LLC, and Yossi Assaraf maintain in their possession and control for a period of five (5) years all business records relating to Add Source, LLC, AdSource, LLC and 24/7 Locksmith Advertising, LLC 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 such records.
6. **GRANT** the Ohio Attorney General its costs in bringing this action.
7. **ORDER** Defendants Add Source, LLC AdSource, LLC, 24/7 Locksmith Advertising, LLC, and Yossi Assaraf to pay all court costs.
8. **GRANT** such other relief as the Court deems to be just, equitable, and appropriate.

Respectfully submitted,

MICHAEL DEWINE  
Ohio Attorney General

/s/ Jeffrey R. Loeser  
Jeffrey R. Loeser (0082144)  
Assistant Attorney General  
Consumer Protection Section  
30 East Broad Street, 14<sup>th</sup> Floor

Columbus, Ohio 43215  
614-466-1305 (telephone)  
877-650-4712 (fax)  
[jeff.loeser@ohioattorneygeneral.gov](mailto:jeff.loeser@ohioattorneygeneral.gov)

Counsel for Plaintiff,  
Ohio Attorney General





24 hour service line (866) 863-1611

(513) 773-3252

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We Accept



19\$ Service Call  
+  
Online Discount

## Contact us now!

24/7 Cincinnati Locksmith's services are available 24hr daily and a 20 minute turnaround should be expected.

Call us today at (513) 773-3252 or simply fill out the form below and an informative dispatcher will contact you in a few short moments with some questions and a general estimate.

Get a quote Online NOW!



Name

(required)

Email

(valid email required)

Phone

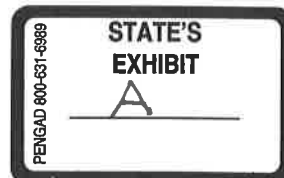
(required)

Your message

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Submit

Areas

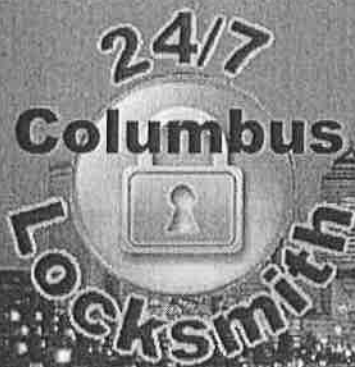




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**10% Online Discount for all our online customers!**

**19\$ Service Call  
+  
Online Discount**

Call (614) 472-8391 now or fill in your details for a free estimate.

Only \$19 Service call! 24 hours a day, 7 days a week!

Get a quote Online NOW!

  
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Call anytime for a free quote  
**(937) 310-2301**  
 24/7 Live Response - \$19 Service Call

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Price List](#)

KETTERING 24 HOUR LOCKSMITH

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13:10

Kettering Locksmith is open  
 24 hours a day to help you.

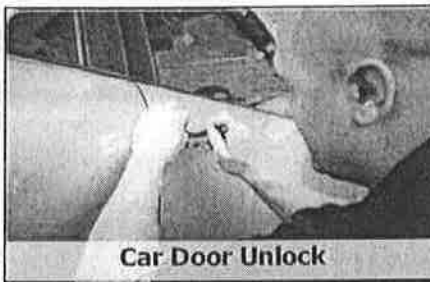


[Locked Out ?](#)

[Lock Change](#)

[Lost Keys ?](#)

[Lock Rekeying](#)



**Car Door Unlock**

#### FAQS:

- [Why is lock rekeying better than a lock change?](#)
- [Where are you located?](#)  
Kettering Locksmith is located downtown Kettering. Kettering Locksmith's locksmiths are mobile, so we always have someone within twenty minutes of you. Call (937) 310-2301 for service now.
- [How much does locksmith service cost?](#)
- [What is a transponder key?](#)
- [How quickly can you get to me?](#)

1 [Next »](#)

#### LATEST NEWS:

##### [The Different Types of Keys \(Part 1\)](#)

There are many types of keys floating around out there. Today we're ...

##### [Auto Lock Out!](#)

Thanks Kettering Locksmith! You helped me out when I really needed it. ...

[Read more](#)

WE ACCEPT ALL MAJOR CREDIT CARDS



When you're locked out of your car, you can count on Kettering Locksmith to be there when you need us. We're open 24 hours a day to help you out. We can be out to you in twenty minutes or less and let you back in your vehicle.

The most common cause of car lockouts is lost keys. Fortunately Kettering Locksmith is able to make you new keys on the spot. We can make all types of keys, including high security keys such as transponder chip and VAT keys.

We have the expertise to deal with all types of automotive locks, keys and ignition problems without taking your car to a shop. You can learn more about our automotive locksmith service on our [automotive locksmith](#) page.



**Locksmith Service**

For excellent locksmith service you can trust, turn to Kettering Locksmith. We've got the best staff of licensed, bonded and insured locksmiths around. We're always here to help you, twenty-four hours a day, seven days a week.

When you're looking for a great locksmith for your business, our [commercial locksmiths](#) will be here to help. They're able to install all types of high security

lock systems and evaluate your security for your business.

Kettering Locksmith also has the best residential locksmiths in Everett. We can help you out when you get locked out of your home or need to change your locks. We can also rekey the locks of your home for added security.

### GET A QUOTE ONLINE NOW!

Name

(required)

Email

(valid email required)

Phone

(required)

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SUBMIT

### Price List

**We offer a \$19 Service call fee in order to cover travel expenses for mobile on-site service.**

Lock Change	Starting at \$25 *
Lock Rekey	Starting at \$19 *
Car Lockout	Starting at \$25 *
House Lockout	Starting at \$25 *
Car Key / Ignition Replacement	Starting at \$90 *
Transponder Car Key / Ignition Replacement	Starting at \$119 *
Safe Lockout	Starting at \$45 *
Mail Box / File Cabinet Lockout	Starting at \$35 *
Mail Box / File Cabinet Change	Starting at \$25 *
Fresh Lock Installation	Starting at \$45 *
Car Key Extraction	Starting at \$75 *

\* Price quotes are a minimum. Every service has it's unique complications... Further inspection is needed, call now so our professional can arrive as soon as possible.

**Important Note:** Unforeseen complications may arise at the site, these changes may affect the price by way of labor or parts. In any circumstance, changes to the final price will be explained before any work is done.

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Locksmith in Worthington | \$19 Service C. | 10% OFF | 15 Min' To Arrive!



Worthington  
Locksmith



Automotive



Residential



Commercial



Emergency



Estimates



FAQs



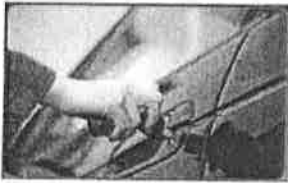
Contact Us

## Worthington Locksmith

Only \$19 Service Call  
(614) 767-5256



### 24/7 Service - 10% Online Discount - Call Now



#### Automotive

Superior Mobile Auto Locksmith  
Services - 24 Hours A Day! →



#### Residential

Your Security Is As Important  
For Us As Our Own! →



#### Commercial

Business Security Solutions  
Provided By The Pro's! →



#### Emergency

Only 15 Minutes Response For  
All Emergency Calls! →

## Worthington Locksmith

Having trouble with your ignition? Want to upgrade your locks?

Worthington Locksmith is exactly what you need – an excellent and fast service provider.

Call (614) 767-5256 now and avail our 24-hour fast and reliable service for all your locksmith needs.

We cover the entire Worthington metro area with a speedy response time of 20 minutes from the time of your call.

Worthington Locksmith sends licensed and bonded professionals you can trust your home, business and car security concerns with.

Count on us to be there when you need us. Contact us at (614) 767-5256 now!

## We Provide:

- Auto Lock Out
- Home Lock Out
- Lock Rekey

### Worthington Locksmith benefits:

- 20 Minutes Response
- 24 / 7 availability
- Low Rates!

Call us now at (614) 767-5256!

Worthington Locksmith, serving the Worthington metro 24 hours a day!



## FAQs:

- ② [Can you replace the car keys I lost?](#)
- ② [Can I schedule service with Worthington Locksmith?](#)
- ② [Can you duplicate a key marked with "Do not duplicate"?](#)
- ② [My keys do not insert or withdraw smoothly. Help!](#)
- ② [I have a unique car model. Can you replace my transponder key?](#)

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Email

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24 hour service line (866) 863-1611

**(216) 503-7017**

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We Accept



19\$ Service Call  
+  
Online Discount

## Contact us now!

24/7 Cleveland Locksmith's services are available 24hr daily and a 20 minute turnaround should be expected.

Call us today at (216) 503-7017 or simply fill out the form below and an informative dispatcher will contact you in a few short moments with some questions and a general estimate.

Get a quote Online NOW!

Name

(required)

Email

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Phone

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Automotive

Commercial  
  
Commercial

Residential  
  
Residential

Areas



## Service Areas

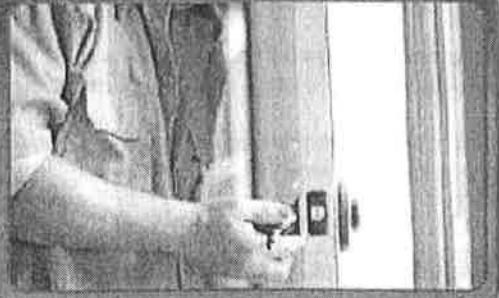
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## Dublin

Only \$19 Service Call  
(614) 932-2375



## 24/7 Service - 10% Online Discount - Call Now



### Automotive

Superior Mobile Auto Locksmith  
Services - 24 Hours A Day! →



### Residential

Your Security Is As Important  
For Us As Our Own! →



### Commercial

Business Security Solutions  
Provided By The Pro's! →



### Emergency

Only 15 Minutes Response For  
All Emergency Calls! →

## Dublin Locksmith

Almost everyone gets to find himself in need of a locksmith, at least once.

Dublin Locksmith offers professional, mobile security solutions for car and home owners in Dublin, 24 hours a day.

Whenever you need a reliable, local locksmith service – you can rest assured that there is a technician nearby, who will gladly solve your problem on-site.

Our average response time is only 20 minutes from the moment we accept the call from the customer.

Call us now at (614) 932-2375 for an instant locksmith service in Dublin!

## Auto Locksmith Services

Dublin Locksmith provides various 'round auto locksmith services. Our **car lockout** service is absolutely damage-free!

### Get The Following Services Provided 24 Hours A Day, 7 Days A Week:

- [Car Unlock](#)
- [Lock Rekey](#)
- [Car Keys Made](#)
- [House Lockout](#)

### FAQs:

- ❓ [Is there a way for you to program my extra Transponder key?](#)
- ❓ [How long does it take you to go to my location?](#)
- ❓ [My car key is broken. Should I replace my ignition?](#)



We also provide car key replacement services for all makes and models cars. We have cutting machines and blanks for all types of keys, including the newest **Transponder keys**.

## Home Locksmith Services

Your home is guaranteed to be protected the best way possible, once you put your security in the hands of one of our specialists.

Lock change, locks rekeying, mail box keys and swift home unlock – you name it, we do it all, 24 hours a day!

## Business Locksmith Services

Your business will be protected like no other business in Dublin, once you get your security needs estimated and handled by one of our experts.

Our locksmiths are licensed and bonded technicians and our services are covered with a 90-day guarantee, so call Dublin Locksmith with confidence!

You can never know when you will find yourself in dire need of a locksmith service, but you can rest assured that we have you covered all the time.

We believe that our customer deserve the best treatment and the highest level of service, which is what we provide. Dial (614) 932-2375 now!

## Rates

**We offer a \$19 Service call fee in order to cover travel expenses for mobile on-site service.**

Lock Change	\$25 *
Lock Rekey	\$19 *
Car Lockout	\$25 *
House Lockout	\$25 *
Car Key / Ignition Replacement	\$90 *
Transponder Car Key / Ignition Replacement	\$119 *
Safe Lockout	\$45 *
Mail Box / File Cabinet Lockout	\$35 *
Mail Box / File Cabinet Change	\$25 *
Fresh Lock Installation	\$45 *
Car Key Extraction	\$75 *

These aforementioned price quotes are a minimum for their respective service. These prices may increase on-site when our technician has a chance to fully and exactly appreciate the situation on hand.

**Important Note:** Unforeseen complications may arise at the site, these changes may affect the price by way of labor or parts. In any circumstance, changes to the final price will be explained before any work is done.

? [Until what time is your service available?](#)

? [Can I get a discount?](#)

1 2 [Next »](#)

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**Call now at (614) 932-2375.**

**Not in a hurry? Fill in the form and we will get back to you.**

Name (required)

Email (valid email required)

Phone (required)

Your message

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Submit



Call anytime for a free quote  
**(937) 506-4275**  
24/7 Live Response – \$19 Service Call

24 Hour Service  
Price List

**DAYTON 24 HOUR LOCKSMITH**

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13 | 06

# Call On Dayton Locksmith For Your Locksmith Needs 24 Hours A Day

## Locked Out ?

## Lock Change

## Lost Keys ?

## Lock Rekeying

## Car Door Unlock

## Locksmith Service

### FAQS:

[Can you upgrade my security?](#)

[How quickly can you be to me?](#)

[How much does locksmith service cost?](#)

[Where are you located?](#)

[What is the best way to contact you?](#)

[1 2 Next »](#)

### LATEST NEWS:

#### [Dog Restrict](#)

Read a testimonial by one of our customers!  
When getting out ...

#### [Do Not Duplicate Keys And Restricted Keys](#)

What's the difference? A Do Not Duplicate key, also called a ...

### WE ACCEPT ALL MAJOR CREDIT CARDS



When you're locked out of your car, we know you want to get back in. **Dayton Locksmith's** emergency lock out service is the quickest in town. Within twenty minutes of calling us we'll be out to you, letting you back in your car and getting you back to your life.

No matter when you get locked out, you can be sure of getting a hold of us. We're staffed twenty-four hours a day with the best locksmiths in town. We've opened thousands of car doors safely and we'll open your door safely without causing damage to your vehicle.

**Dayton Locksmith** provides many different locksmith services to Dayton. When you need an expert [commercial locksmith](#) for your business, count on us to have the best in town. From rekeying your locks to installing state of the art lock systems, we do it all.

We also have the top [residential](#) and [automotive](#) locksmiths. From rebuilding the ignition in your car to creating new keys and everything in between, we've got your vehicle covered. For your home we offer security experts to help with everything from new locks to lock outs.

### GET A QUOTE ONLINE NOW!

Name

(required)

Email

(valid email required)

Phone

(required)

Your message

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SUBMIT

## Price List

**We offer a \$19 Service call fee in order to cover travel expenses for mobile on-site service.**

Lock Change	Starting at \$25 *
Lock Rekey	Starting at \$19 *
Car Lockout	Starting at \$25 *
House Lockout	Starting at \$25 *
Car Key / Ignition Replacement	Starting at \$90 *
Transponder Car Key / Ignition Replacement	Starting at \$119 *
Safe Lockout	Starting at \$45 *
Mail Box / File Cabinet Lockout	Starting at \$35 *
Mail Box / File Cabinet Change	Starting at \$25 *
Fresh Lock Installation	Starting at \$45 *
Car Key Extraction	Starting at \$75 *

\* Price quotes are a minimum. Every service has it's unique complications... Further inspection is needed, call now so our professional can arrive as soon as possible.



**Important Note:** Unforeseen complications may arise at the site, these changes may affect the price by way of labor or parts. In any circumstance, changes to the final price will be explained before any work is done.

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