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FILED

DEC 29 2017

CLERK OF THE NAPA SUPERIOR COURT
BY [Signature]
DEPUTY

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF NAPA

12 THE PEOPLE OF THE STATE OF)
13 CALIFORNIA,)

14 Plaintiff,)

15 vs.)

16 Federal Debt Assistance Association, LLC, a)
17 Maryland Limited Liability Company,)
18 ROBERT PANTOULIS,)

19 Defendants.)

Case No. 17CV001479

COMPLAINT FOR CIVIL PENALTIES
AND EQUITABLE RELIEF

CASE MANAGEMENT CONFERENCE

DATE: 12-07-18

TIME: 8:30am

PLACE: Courtroom J

825 Brown Street, Napa CA 94559
111 Third

20 Plaintiff, the People of the State of California, appears through its attorneys, Allison
21 Haley, District Attorney for the County of Napa, by Katy Yount, Deputy District Attorney, and
22 alleges upon information and belief that:

JURISDICTION AND VENUE

23 1. The authority of the District Attorney to bring this action is derived from that
24 statutory law of the State of California, specifically Business & Professions Code sections
25 17200, 17203, 17204, 17206, 17500, 17533.6, 17535, and 17536. Plaintiff, by this action, seeks
26 to enjoin Defendant Federal Debt Assistance Association, LLC and Defendant Robert Pantoulis,
27 from engaging in the unlawful business practices alleged herein, and seeks civil penalties,
28 injunctive relief, and restitution for the Defendants' violations of the above statutes.

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DEFENDANTS

2. Defendant, Federal Debt Assistance Association, LLC, is a Maryland Limited Liability Company, with its principal place of business at 11615 Crossroads Circle, Suite M, Baltimore, MD 21220.

3. Defendant, Robert Pantoulis, is an individual and member of Federal Debt Assistance Association, LLC.

4. Defendants are engaged in the business of consumer debt reduction. The violations of law alleged herein have been carried out within Napa County.

5. Whenever reference is made in this Complaint to any act of the limited liability company Defendant, such reference shall be deemed to mean that the company's officers, directors, members, managers, employees, agents, or representatives did, ratified, or authorized such act while actively engaged in the management, direction or control of the affairs of the limited liability company Defendant or while acting within the scope and course of their duties.

6. Upon information and belief, on or between January 1, 2013 and January 1, 2017, Defendants mailed illegal advertisements to 5,664 persons in California for a debt reduction program which implied government connection and/or approval that Defendants did not have, by, among other things, using a seal or other symbol almost identical to the Seal of the President of the United States, using a company name and acronym that resembles a federal agency, and using language in the mailer such as "bylaws" and "regulatory notification" that resembles language used by a federal regulatory agency.

FIRST CAUSE OF ACTION

**VIOLATIONS OF BUSINESS & PROFESSIONS CODE SECTION 17533.6
(USE OF TERM, SYMBOL, OR CONTENT INDICATING GOVERNMENTAL
CONNECTION)**

7. Plaintiff incorporates by reference paragraphs 1 through 6 as if set forth in full herein.

1 indirectly engaging in acts of unfair competition as defined in Business & Professions Code
2 section 17200 and be specifically enjoined from engaging in the types of acts or practices set
3 forth in the Second Cause of Action.

4 3. Pursuant to Business & Professions Code section 17536, the Court assess a civil
5 penalty of two thousand five hundred dollars (\$2,500.00) jointly and severally against
6 Defendants for each violation of Business & Professions Code section 17533.6.

7 4. Pursuant to Business & Professions Code section 17206, the Court assess a civil
8 penalty of two thousand five hundred dollars (\$ 2,500.00) jointly and severally against
9 Defendants for each violation of California Business & Professions Code section 17200.

10 5. Defendants be ordered, jointly and severally, to make full and complete restitution
11 to all victims of Defendants' acts of false advertising and unfair competition.

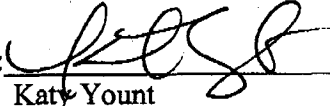
12 7. That Plaintiff recover costs of suit.

13 8. That Plaintiff have whatever and further relief as this Court deems equitable and
14 just.

15 Respectfully submitted,

16 Dated: 12/28/17

17 Allison Haley
18 Napa County District Attorney

19 By: 
20 Katy Yount
21 Deputy District Attorney