

consumer transactions for residential cleaning services in Franklin County and other counties throughout the State of Ohio.

4. Defendants accepted deposits and/or payments from consumers for residential cleaning services, but in some instances failed to provide the services when represented.
5. 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.
6. Defendant Reyes in some instances operated under the names 614 Maid Brigade and Home Sweet Home Cleaning Services, but did not register or report said trade names with the Ohio Secretary of State.

CONCLUSIONS OF LAW

7. Jurisdiction over the subject matter of this action lies with this Court pursuant to R.C. 1345.04 of the CSPA.
8. This Court has venue to hear this case pursuant to Ohio Civ. R. 3(C)(1) and (3).
9. The Attorney General of Ohio is the proper party to commence these proceedings in the public interest and on behalf of the State of Ohio under the authority vested in him by the CSPA.
10. Defendants were "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).
11. Defendant Reyes, at all times pertinent to this action, 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 in this action.

12. 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.
13. 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.

ORDER

- A. Plaintiff's request for the issuance of a declaratory judgment finding that each act or practice set forth above violates the CSPA and its Substantive Rules, O.A.C. 109:4-3-01 *et seq.*, is hereby GRANTED.
- B. 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, in connection with any consumer

transaction, are hereby PERMANENTLY ENJOINED from engaging in any unfair, deceptive, or unconscionable acts and practices that violate the CSPA or its Substantive Rules , O.A.C. 109:4-3-01 *et seq.*, including, without limitation, violations of the specific statutes described in this Consent Judgment.

- C. Pursuant to 1345.07(B), Defendants are ORDERED, jointly and severally, to pay \$9,900.50 in consumer damages. Payment of the foregoing amount shall be made at the rate of \$300.00 per month for 32 months with a final 33rd payment of \$300.50. The first payment is due immediately upon entry of this Consent Judgment with the remaining payments to begin on January 1, 2022 and continue on the same day of each subsequent month until paid in full. If all payments are timely made pursuant to this paragraph, the last payment will be due on or before August 1, 2024. Payments will be distributed, at the discretion of the Plaintiff, to the following thirty-five (35) consumers in the amounts set forth below:

Last Name	First Name	Amount
Bautista	Summer	\$230.00
Beougher	Evan	\$270.00
Borden	Lisa	\$185.00
Brown	Jacklyn	\$260.00
Campbell	Janna	\$187.50
Chapel	Alissa	\$205.00
Clark	Krista	\$595.00
Dezso	Caitlin	\$205.00
Eaton	Jana	\$100.00
Fabian	Heather	\$100.00
Gabor	Michael	\$540.00
Gibboney	Amanda	\$270.00
Guroy	Jenny	\$300.00
Hale	Ashley	\$100.00
Helline	Allison	\$765.00

Hicks	Julie	\$370.00
Hopson	Maggie	\$245.00
Hoyord	Erika	\$265.00
King	Alyssa	\$200.00
March	Lisa	\$100.00
Mathews	Kami	\$220.00
Micetich	Barbara	\$320.00
Murphy	Denise	\$215.00
Myers	Amanda	\$250.00
Penrose	Chasity	\$180.00
Pickworth	Gretchen	\$350.00
Purtee	Christina	\$566.00
Reeves	Lindsey	\$472.00
Reuter	Jessica	\$125.00
Ritchie	Natalie	\$260.00
Rose	Jessica	\$320.00
Ruby	Beth	\$185.00
Runkle	Michelle	\$400.00
Sledbodnik	Tamara	\$245.00
Stelzer	Nicole	\$300.00
	TOTAL	\$9,900.50

- D. It is further ORDERED that if Defendants fail to timely make any of the payments due in accordance with the payment schedule set forth in Paragraph C, the remaining consumer damages amount shall immediately become due and payable.
- E. Based on the above findings that Defendants committed unfair and deceptive acts and practices in violation of the CSPA, Defendants are ORDERED, jointly and severally, pursuant to R.C. 1345.07(D), to pay a civil penalty of \$10,000.00. Payment of the forgoing amount, shall be suspended so long as the consumer damages ordered in Paragraph C are paid in accordance with the payment schedule set forth therein and Defendants comply with all the remaining paragraphs of this Consent Judgment.
- F. The payments ordered in Paragraphs C, D and E above shall be made to the Attorney

General via a certified check or money order, made payable to the "Ohio Attorney General" and delivered to:

Financial Specialist
Consumer Protection Section
Office of the Ohio Attorney General
30 East Broad Street, 14th Floor
Columbus, Ohio 43215

- G. It is further ORDERED that the acceptance of any payment by the Plaintiff subsequent to the time it is due or the failure of the Plaintiff to insist on strict performance of any order contained within this Consent Judgment, including, but not limited to, the obligation created by the acceleration provision in Paragraph D of this Consent Judgment, shall not be construed as a waiver of any of the obligations created by this Consent Judgment.
- H. Defendants are hereby notified that if they fail to make any payment due in accordance herein, the unpaid amount due under this Consent Judgment may be referred to the Ohio Attorney General's Collection Enforcement Section for collection. Should the unpaid amount be referred for collection, the Collections Enforcement Section will assess additional collection fees and interest against them pursuant to Ohio law, including, but not limited to R.C. 131.02, 109.08, and 109.081.
- I. It is further ORDERED that in the event the Ohio Attorney General must initiate legal action or incur any costs to compel Defendants to abide by this Consent Judgment, Defendants shall be liable to the Ohio Attorney General, should he prevail, for all related enforcement costs, including, but not limited to, a reasonable sum for attorneys' fees, investigative costs, and interest and collection costs as permitted by statute.
- J. Defendants shall not represent, directly or indirectly, that the Ohio Attorney General has

sanctioned, condoned, or approved any part or aspect of their business operations.

K. Defendants shall pay all court costs associated with this action.

IT IS SO ORDERED.

DATE

JUDGE

JOINTLY APPROVED FOR ENTRY AND SUBMITTED BY:

DAVE YOST
Ohio Attorney General

By: /s/ W. Travis Garrison
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by Travis Garrison)
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*Counsel for Defendants Maid in Columbus
614, LLC and Kayla Reyes*

ALSO APPROVED AND AGREED TO BY:

Maid in Columbus 614, LLC

By: /s/ Kayla Reyes (per written approval,
by Travis Garrison)
Kayla Reyes, Sole Member

Defendant

/s/ Kayla Reyes (per written approval, by
Travis Garrison)
Kayla Reyes

Defendant

Franklin County Court of Common Pleas

Date: 01-07-2022

Case Title: STATE OF OHIO EX REL ATTORNEY GEN DAVE Y -VS- MAID
IN COLUMBUS 614 LLC ET AL

Case Number: 21CV007536

Type: CONSENT JUDGMENT

It Is So Ordered.

A handwritten signature in black ink, appearing to read "Stephen L. McIntosh", is written over a circular official seal. The seal contains the text "JUDGE OF THE COURT OF COMMON PLEAS" and "FRANKLIN COUNTY, OHIO".

/s/ Judge Stephen L. McIntosh