



3. The saturation of public information sources by the "Locksmith Scammers" has resulted in a decline in plaintiff's business to an extent that plaintiff filed bankruptcy on April 20, 2010 and is expected to lose his house by foreclosure sale in mid-November.

4. Some or all of these "Locksmith Scammers", once they get calls from consumers, utilize fraudulent tactics such as bait and switch on pricing to unnecessarily destroying consumers' locks in lockout situations.

5. The activities described in paragraph 4 are being practiced on a daily basis and have damaged, and will continue to damage the reputation of professional locksmiths.

6. The ILS DEFENDANTS named in the plaintiff's complaint have caused plaintiff harm and if they are allowed to continue to engage in this course of action unchecked will cause plaintiff irreparable harm.

7. The ILS DEFENDANTS have no right to engage in criminal behavior or unfair practices so enjoining that behavior can cause them no harm.

8. A.R.S. §44-1221 states:

44-1221. Deceptive use of name; classification; attorney general

A. It is unlawful for a person to deceive another person by misrepresenting the geographical origin or location of the person's business in the conduct of the person's business.

B. A person who intentionally or knowingly violates subsection A of this section is guilty of a class 2 misdemeanor.

C. An act or practice in violation of this section is an unlawful practice under section 44-1522 and subject to enforcement through private action and prosecution by the attorney general. The attorney general may investigate and take appropriate action as prescribed by chapter 10, article 7 of this title.

(emphasis added)

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9. Plaintiff has been victim of one or more of the ILS DEFENDANTS engaging in computer crime, specifically a listing on Google, Inc.'s "MAPS" search engine relating to plaintiff's business was at one time compromised and plaintiff's telephone number was removed and replaced with 866-992-4545. This caused consumers accessing this listing about plaintiff's business to be placed into contact with one of the ILS DEFENDANT's call centers thus illegally diverting business away from plaintiff's business.

10. Plaintiff has identified some 450+/- telephone numbers being used among these eleven ILS DEFENDANT companies that are listed to addresses that the ILS DEFENDANTS neither own, lease, rent, occupy, or have any other legal connection with. A document containing that collection of telephone numbers is attached and marked "EXHIBIT 1 - ALL COMPANIES PHONE NUMBERS" for identification and incorporated herein by reference.

11. Plaintiff asserts that some or all of the TELCO DEFENDANTS are supplying the various ILS DEFENDANTS with various quantities of telephone numbers and the ability to cause the ILS DEFENDANTS' collections of contrived listings containing phony addresses to be published into public domain to the detriment of plaintiff as well as every other existing legitimate locksmith. the TELCO DEFENDANTS .

12. The TELCO DEFENDANTS in their capacities as "PUBLIC UTILITIES" are violating their fiduciary duty to the public to ensure that all name and address information provided to them by customers for publication is factually correct and accurate.

13. The actions of the TELCO DEFENDANTS have caused and continue to cause irreparable harm to plaintiff.

14. Plaintiff has no plain, speedy, or adequate remedy other than injunctive relief.

13. Plaintiff requests that the court issue a preliminary injunction against the **ILS DEFENDANTS** and each of them prohibiting them from:

- (A) Advertising in any form of media any address that they do not actually own, rent, or lease.;
- (B) Receiving and/or answering any telephone calls on any telephone number that is associated with any address(es) advertised either in print or internet media in which they cannot demonstrate that they either own, rent, or lease the address in question.;
- (C) Attempting to utilize "Local Number Portability" to move any telephone numbers from one carrier to another until further order of this Court or the termination of this action.
- (D) Accessing the any online records of any **EXISTING LOCKSMITH** on such services as GOOGLE, YAHOO, or any other online service and attempting to modify the name, address, telephone number, website URL or any other information relating to any **EXISTING LOCKSMITH**.

14. The Court issue a PRELIMINARY INJUNCTION against the **TELCO DEFENDANTS** and each of them prohibiting them from:

- (A) Providing or continuing to provide telephone services to the **ILS DEFENDANTS** and each of them for any telephone number assigned to such **ILS DEFENDANT** that is associated with any address where the **TELCO DEFENDANT** has not actually physically installed telephone service or has seen documentary evidence in the form of a title deed or a verifiable rental or lease agreement showing that the **ILS DEFENDANT** in question is legally entitled to possession of the premises address associated with that telephone number.

- (B) Accepting from any customer any order involving the ability of the end-user customer or their representative or agent to supply business names that are not registered with the State of Arizona or addresses that they do not own, rent, or lease and provide backup documentation demonstrating said ownership or a verifiable rental or lease agreement.
- (C) Permitting any of the various **ILS DEFENDANTS** to exercise their rights to utilize the "Local Number Portability" mechanism to move any affected telephone number to another carrier until further order of this Court or until this action is terminated or resolved.
- (D) Accepting and implementing any orders for new service from the **ILS DEFENDANTS** pending the outcome of this action.

15. The court issue a PRELIMINARY INJUNCTION prohibiting defendant GOOGLE from permitting anyone to access GOOGLE's computers in any manner that would enable them to edit a listing for a business that they are unrelated to.

16. The court issue a PRELIMINARY INJUNCTION requiring **OWNER OF 866-992-4545** to cease and desist with all computer tampering activities and all activities consistent with attempting to divert business away from legitimate businesses by fraud, deceit, scheme, artifice or device.

Respectfully submitted,

Dated \_\_\_\_\_

\_\_\_\_\_  
Charles Eastwood,  
Plaintiff in Pro. Per.

**EXHIBIT 1 – ALL COMPANIES PHONE NUMBERS**

Page 1

(480) 306-0101	(480) 422-4180	(480) 478-0603	(480) 621-3867	(480) 777-7488
(480) 307-8188	(480) 422-4181	(480) 478-0688	(480) 621-3868	(480) 816-9833
(480) 339-0011	(480) 422-4182	(480) 483-5080	(480) 621-3869	(480) 820-2145
(480) 347-0745	(480) 422-4183	(480) 488-9551	(480) 621-3870	(480) 820-3658
(480) 347-9115	(480) 422-4184	(480) 515-1287	(480) 621-3871	(480) 821-5558
(480) 347-9160	(480) 422-4185	(480) 553-9425	(480) 621-3872	(480) 836-4279
(480) 371-3220	(480) 422-4186	(480) 584-5024	(480) 621-3873	(480) 941-7212
(480) 371-3285	(480) 422-4189	(480) 607-6770	(480) 621-3874	(480) 947-0371
(480) 371-3287	(480) 422-4190	(480) 621-3837	(480) 621-3875	(480) 947-1160
(480) 371-3289	(480) 422-4192	(480) 621-3838	(480) 621-3876	(480) 966-2232
(480) 371-3290	(480) 422-4195	(480) 621-3839	(480) 621-3877	(480) 969-7432
(480) 371-3292	(480) 422-4197	(480) 621-3840	(480) 621-3878	(480) 970-1778
(480) 371-3294	(480) 422-4198	(480) 621-3841	(480) 621-3879	(480) 991-0508
(480) 371-3295	(480) 429-7602	(480) 621-3842	(480) 621-3880	(480) 998-1345
(480) 371-3297	(480) 455-3342	(480) 621-3843	(480) 621-3881	(520) 254-5260
(480) 371-3299	(480) 455-3343	(480) 621-3844	(480) 621-3882	(520) 395-9485
(480) 371-3322	(480) 455-3344	(480) 621-3845	(480) 621-3883	(520) 395-9498
(480) 371-3324	(480) 455-3344	(480) 621-3846	(480) 621-3884	(520) 979-3418
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(480) 371-3327	(480) 455-3345	(480) 621-3848	(480) 621-3886	(602) 243-0108
(480) 371-3329	(480) 455-3346	(480) 621-3849	(480) 621-3887	(602) 249-8752
(480) 374-1687	(480) 455-3346	(480) 621-3850	(480) 621-3939	(602) 251-2338
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(480) 422-4178	(480) 478-0067	(480) 621-3865	(480) 775-4070	(602) 265-0346
(480) 422-4179	(480) 478-0089	(480) 621-3866	(480) 777-3915	(602) 274-0866

**EXHIBIT 1 – ALL COMPANIES PHONE NUMBERS**

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(602) 274-0866	(602) 386-3745	(602) 633-9257	(602) 772-3121	(623) 414-4231
(602) 275-1967	(602) 386-3746	(602) 633-9258	(602) 772-3122	(623) 414-4232
(602) 276-0330	(602) 386-3747	(602) 633-9259	(602) 772-3123	(623) 414-4233
(602) 283-9482	(602) 386-3748	(602) 633-9260	(602) 772-3124	(623) 414-4234
(602) 314-2872	(602) 386-3749	(602) 633-9261	(602) 772-3126	(623) 414-4235
(602) 314-3418	(602) 386-3750	(602) 633-9262	(602) 772-3129	(623) 414-4236
(602) 325-5200	(602) 386-3751	(602) 633-9263	(602) 772-3165	(623) 414-4237
(602) 325-5205	(602) 386-3752	(602) 633-9264	(602) 772-3166	(623) 414-4238
(602) 325-5506	(602) 386-3753	(602) 633-9265	(602) 772-3169	(623) 414-4239
(602) 340-0146	(602) 386-3754	(602) 633-9266	(602) 772-3170	(623) 414-4240
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(888) 701-5349  
(888) 750-5625  
(888) 850-5625  
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