

COPY

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1 Charles Eastwood  
2 4024 N. 84<sup>th</sup> Ln.  
3 Phoenix AZ 85037  
4 602-717-5397  
5 Plaintiff in Pro Per

SUPERIOR COURT OF ARIZONAA  
COUNTY OF MARICOPA

CV2010 027605

7 CHARLES EASTWOOD,  
8 Plaintiff,  
9 vs.

Case No.:

10 ATLAS LOCKSMITH SOLUTIONS, LLC;  
11 AMIR RON; JANE DOE RON; KOBI BURSHEIN;  
12 JANE DOE BURSHEIN; ODED TAMIR; JANE  
13 DOE TAMIR; MILLER LOCK & SAFE, LLC;  
14 MILLENNIUM LOCKSMITH LLC, NIR AVITAN;  
15 JANE DOE AVITAN; AURITAI COHEN; JANE  
16 DOE COHEN; ROTEM NAHMARA; JANE DOE  
17 NAHMARA; ORON GARABIAN; JANE DOE  
18 GARABIAN; BASAD, INC.; PELEG FORMAN;  
19 BATIA "BELLI" FORMAN; SHARON BITON;  
20 MICHAEL BITON; DEPENDABLE LOCKS, INC.;  
21 DAVID PEER; JANE DOE PEER; DAVID  
22 SASSON; JANE DOE SASSON; GLOBAL  
23 LOCKSMITH, LLC; APPLE CONTRACTING, LLC  
24 dba TRUST LOCKSMITH; ADAM AVIGDOR; JANE  
25 DOE AVIGDOR; SOS LOCKSMITH; AAA  
26 LOCKSMITH SERVICES; COMPLETE SERVICES,  
27 LLC; YIGAL LAMPERT; JANE DOE LAMPERT;  
28 24/7 LOCKSMITH; OWNER OF 866-992-4545;  
29 RUSSELL KUTSENKO; JANE DOE KUTSENKO;  
30 ELECTRIC LIGHTWAVE, LLC; INTEGRA  
31 TELECOM HOLDINGS, INC.; TW TELECOM  
32 HOLDINGS, INC.; TW TELECOM OF ARIZONA  
LLC; XO COMMUNICATIONS, LLC;  
XO COMMUNICATIONS SERVICES, INC.;  
ESCHELON TELECOM, INC.; ESCHELON  
TELECOM OF ARIZONA, INC.; MOUNTAIN  
TELECOMMUNICATIONS OF ARIZONA, INC.;  
COMCAST PHONE OF ARIZONA, LLC; TELEPORT  
COMMUNICATIONS GROUP INC.; 360NETWORKS  
(USA) INC.; QWEST SERVICES CORPORATION  
OF COLORADO (FN), QWEST SERVICES  
CORPORATION, QWEST CORPORATION;  
SUPERMEDIA LLC, SUPERMEDIA SALES - WEST  
INC.;

COMPLAINT FOR VIOLATIONS  
OF ARS §44-1221  
MISREPRESENTING THE  
GEOGRAPHICAL ORIGIN OR  
LOCATION OF THE PERSON'S  
BUSINESS, ARS 44-1522, et.  
seq. CONSUMER FRAUD,  
CONSPIRACY, NEGLIGENCE,  
GROSS NEGLIGENCE, UNFAIR  
BUSINESS PRACTICES, BREACH  
OF FIDUCIARY DUTY, BREACH  
OF CONTRACT, DECLARATORY  
RELIEF

TEMPORARY RESTRAINING  
ORDER  
PRELIMINARY AND PERMANENT  
INJUNCTIVE RELIEF,

PETITION FOR A WRIT OF  
MANDAMUS REQUIRING THE  
ARIZONA ATTORNEY GENERAL  
TO TAKE OVER THE CRIMINAL  
AND CONSUMER FRAUD ASPECTS  
OF THIS CASE

APPOINTMENT OF A RECEIVER  
TO TAKE POSSESSION OF  
ATLAS LOCKSMITH SOLUTIONS,  
LLC; MILLENNIUM LOCKSMITH,  
LLC; DEPENDABLE LOCKSMITH;  
COMPLETE SERVICES LLC,  
GLOBAL LOCKSMITH, LLC;  
TRUST LOCKSMITH, SOS  
LOCKSMITH, AAA LOCKSMITH,  
OWNER OF 866-992-4545 and  
BASAD, INC.

1 )  
2 GOOGLE, INC., YAHOO! Inc. ARIZONA )  
3 ATTORNEY GENERAL TERRY GODDARD, )  
4 ILS DOES 1-999; TELCO DOES 1000-1999, )  
5 Defendants )

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6 **SUBJECT MATTER OF THIS ACTION**

7 This action is a private action authorized by ARS section  
8 44-1221(C) to enforce the provisions of 44-1221(A) in an effort  
9 to stop the "**Invasion of the Locksmith Scammers** (ILS)" within  
10 the state of Arizona generally and Maricopa county specifically.  
11 These criminals utilize a modus operandi that includes the  
12 procurement of hundreds to thousands of telephone numbers.  
13 Subsequent to the procurement of these numbers the scammers  
14 cause them to be associated with addresses that have no  
15 connection to them then they cause the telephone numbers and  
16 their associated phony addresses to be published extensively in  
17 printed directories and the internet directories and search  
18 engines and they thoroughly saturate same.

19 The TELCO DEFENDANTS involved are either (A) grossly  
20 negligent in insuring the accuracy of the listings that they  
21 populate into their directory databases which are ultimately  
22 used by all 411 information providers and publishers of print  
23 directories and internet information sources, or (B) are  
24 intentionally co-conspiring with the ILS scammers by accepting  
25 all the phony addresses from them to populate said phony  
26 addresses into the shared database.

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1 Since the telephone companies enjoy "PUBLIC UTILITY" status  
2 conferred upon them by the State of Arizona and "TRUSTED ENTITY"  
3 status by the directory publishing companies and internet  
4 information providers they have a fiduciary duty to the public  
5 to ensure that the information that they place into DIRECTORY  
6 DATABASES is in fact accurate and will not cause the public or  
7 other businesses to be harmed. Plaintiff attempted to gain the  
8 assistance of the ARIZONA ATTORNEY GENERAL and despite the  
9 potential for over \$3,000,000.00 (three million dollars) in  
10 fines against one company alone; Terry Goddard's office has  
11 turned a deaf ear. A defrauded consumer Lisa Mendez informed  
12 plaintiff that she also made a complaint to the Attorney General  
13 that was apparently essentially ignored.

14 On one occasion **Plaintiff personally met with Attorney**  
15 **General Terry Goddard** at a public event and we spoke at length  
16 about the issues surrounding the locksmith scammers. At that  
17 time I handed him a 100 page document that contained  
18 documentation of the "REVIEWER SCAM" and Plaintiff volunteered  
19 to work in his office, perhaps as an investigator or paralegal.  
20 Mr. Goddard declined that offer.

21 Since that date plaintiff has heard nothing from Mr.  
22 Goddard or any of his staff with the exception of one e-mail  
23 from Ms. Ellis in his Tucson office who was simply forwarding me  
24 a copy of a default judgment against DEPENDABLE.

#### 25 PARTIES

26 P1. Plaintiff Charles Eastwood is a resident of Phoenix  
27 Arizona. Plaintiff is a professional locksmith and has held an  
28 Arizona Privilege Tax License for the business "Locksmith  
29 Charley" since 8/14/2001. Plaintiff is a member in good standing  
30 of the Associated Locksmiths of America and after proficiency  
31 testing holds the title "Certified Registered Locksmith".  
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