

IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

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DAVIDSON COUNTY, TENNESSEE

STATE OF TENNESSEE, *ex rel.* HERBERT)
H. SLATERY III, Attorney General and)
Reporter,)

Plaintiff,)

v.)

LA INVESTORS LLC d/b/a LOCAL)
RECORDS OFFICE and NATIONAL)
PROFILE DOCUMENT, a California limited)
liability company,)

JUAN ROBERTO ROMERO ASCENCIO,)
a/k/a ROBERTO ROMERO, individually,)
and d/b/a LA INVESTORS LLC, LOCAL)
RECORDS OFFICE, and NATIONAL)
PROFILE DOCUMENT, and)

LAURA ROMERO, individually, and d/b/a LA)
INVESTORS LLC, LOCAL RECORDS)
OFFICE, and NATIONAL PROFILE)
DOCUMENT,)

Defendants.)

AB

D.C.

JURY DEMAND

Case No. 17C 888

CIVIL ENFORCEMENT COMPLAINT

This civil enforcement action seeks to redress extensive consumer harm throughout Tennessee that exists as a result of Defendants' unfair, deceptive, and misleading "government impostor" and "fake invoice" mailings. Defendants have accumulated millions of dollars in revenue by impersonating a government office while mailing documents that look like government invoices to unsuspecting Tennessee consumers. These invoices to require payment of \$89 from consumers for copies of their deeds and other property-related documents, even

though such documents are generally available for free or for a nominal cost at local government records offices or on the internet and are not required to be purchased. Defendants should not be permitted to profit from illegal solicitations disguised as official government invoices.

The State of Tennessee brings this civil enforcement action in its sovereign capacity by and through Herbert H. Slatery III, Attorney General and Reporter, pursuant to the Government Impostor and Deceptive Advertisements Act, Tenn. Code Ann. § 47-18-131 (Government Impostor Act), and the Tennessee Consumer Protection Act of 1977, Tenn. Code Ann. § 47-18-101 *et seq.* (TCPA), to obtain injunctive relief, restitution, disgorgement of ill-gotten gains, and other equitable and statutory relief for Defendants' acts and practices in violation of the Government Impostor Act and the TCPA.

THE PARTIES

Plaintiff

1. Plaintiff, State of Tennessee, is one of the fifty sovereign states of the United States. Herbert H. Slatery III is the Attorney General and Reporter of the State of Tennessee and has been duly appointed to serve as Attorney General by the Tennessee Supreme Court.

2. The Attorney General is authorized by Tenn. Code Ann. §§ 47-18-108 and -131 and his powers at common law to obtain permanent injunctive relief, rescission or reformation of contracts, disgorgement of ill-gotten gains, and other equitable and statutory relief for Defendants' acts and practices in violation of the Government Impostor Act and the TCPA.

3. The Attorney General has reason to believe that Defendants have violated and continue to violate the Government Impostor Act and the TCPA by engaging in, and assisting and facilitating the commission of, deceptive, unfair, and illegal acts and practices in Tennessee, and that this civil enforcement action is in the public interest.

Defendants

4. Defendant LA Investors LLC (LAI) is a California limited liability company with its primary address at 26302 South Western Avenue, Suite 5, Lomita, California 90717. At all relevant times, LAI has conducted business in Tennessee as Local Records Office and National Profile Document.

5. Since at least January 19, 2012, Local Records Office has leased a United Parcel Service (UPS) Box at 533 Church Street, # 142, Nashville, Tennessee 37219.

6. Local Records Office uses this Nashville address to engage in the business of “billing” Tennessee consumers an \$89 fee for copies of their property deeds and other public information through solicitations mailed into Tennessee.

7. These Local Records Office invoices appear to originate from the government and require prompt response and payment.

8. Since at least December 1, 2013, National Profile Document has leased a UPS Box at 5133 Harding Pike, Ste. B10-281, Nashville, Tennessee 37205.

9. National Profile Document uses this Nashville address to engage in the business of billing Tennessee consumers an \$88 fee for copies of public information through solicitations mailed into Tennessee.

10. These National Profile Document invoices appear to originate from the government and require prompt response and payment.

11. Neither LAI, Local Records Office, nor National Profile Document are licensed or authorized to do business in the state of Tennessee.

12. Since its formation in 2008, LAI has operated under at least six assumed names but has failed to register any of them with the Tennessee Secretary of State.

13. LAI is not affiliated in any way with any governmental entity in Tennessee or elsewhere.

14. Defendant Juan Roberto Romero Ascencio a/k/a Roberto Romero (Romero) is an individual and a resident of the state of California, residing at 10602 Neaville Avenue, Downey, California 90241.

15. At all material times, Romero has owned, operated, and managed LAI, Local Records Office and National Document Profile and has actively participated in their day-to-day activities, including the activities described in this Complaint.

16. Romero receives at least \$500,000 per year in income from the business revenues of LAI d/b/a Local Records Office.

17. Romero is responsible for responding to Local Records Office's consumer complaints.

18. Romero is involved in the creation and dissemination of all advertisements utilized by Local Records Office.

19. Romero, via the internet, purchases all of the demographic information used by Local Records Office when targeting consumers for its government impostor invoice mailings.

20. Romero helps prepare the list of Tennessee consumers that are sent government impostor invoice solicitations.

21. Romero is not a government official or affiliated in any way with any governmental entity in Tennessee or elsewhere.

22. Defendant Laura Romero is an individual and resident of the state of California, residing at 10602 Neaville Avenue, Downey, California 90241.

23. Laura Romero is Romero's wife.

24. At all material times, Laura Romero has owned and assisted Romero in operating and managing Local Records Office and has actively participated in its day-to-day activities, including the activities described in this Complaint.

25. Laura Romero receives at least \$500,000 per year in income from the business revenues of Local Records Office.

26. Laura Romero is not a government official or affiliated in any way with any governmental entity in Tennessee or elsewhere.

27. At all material times, LAI, Romero, and Laura Romero (collectively Defendants), together and individually, have transacted business in Tennessee through the marketing and sale of copies of deeds and other property information to Tennessee consumers by mailing government impostor invoices to them using the United States Postal Service.

JURISDICTION AND VENUE

28. This Court has subject matter jurisdiction pursuant to Tenn. Code Ann. §§ 47-18-108(a) and -131(d)(4).

29. Venue is proper in Davidson County under Tenn. Code Ann. §§ 47-18-108(a)(3) and -131(d)(4) because it is one of the counties where the alleged unfair, deceptive, and misleading acts and practices took place, and one of the counties in which Defendants conduct, transact, or have transacted business.

30. Defendants are subject to jurisdiction in this state through its long-arm statutes, including Tenn. Code Ann. §§ 20-2-201, -214, -223, and -225.

31. Among other things, each Defendant has conducted and continues to conduct business in Tennessee by, among other things, mailing solicitations for the sale of property deeds and other information into the state of Tennessee to Tennessee consumers; owning and operating

a business from 533 Church Street, # 142, Nashville, Tennessee 37219; owning and operating a business from 5133 Harding Pike, Ste. B10-281, Nashville, Tennessee 37205; receiving payments from Tennessee consumers at their 533 Church Street business location; and receiving payments from Tennessee consumers at their 5133 Harding Pike business location, as more fully described in this Complaint. *See* Tenn. Code Ann. §§ 20-2-201, -214(a)(1), and -223(a)(1).

32. Defendants are further subject to jurisdiction in this state under Tenn. Code Ann. §§ 20-2-214(a)(2) and -223(a)(3) because, as more fully described in this Complaint, they have committed tortious acts and omissions and caused injury to Tennessee consumers by mailing deceptive and unlawful government impostor invoices into Tennessee, which mislead and confuse Tennessee property owners into believing they must pay required fees to a local Tennessee government office.

33. Defendants are further subject to jurisdiction in this state under Tenn. Code Ann. § 20-2-223(a)(4) because some of Defendants' tortious acts or omissions which have caused injury in this state originated, in part, outside this state, such as each Defendant's ownership, operation, and management of Local Records Office, a deceptive business scheme, the design and mailing of deceptive solicitations into Tennessee, the engagement in this behavior as a persistent course of conduct, and deriving revenue from this conduct, as more fully described in this Complaint.

34. Defendants are further subject to jurisdiction in this state under Tenn. Code Ann. §§ 20-2-214(a)(5) and -223(a)(2) because they have entered into and contracted to supply or furnish services or things in this state through their use of these unlawful solicitations and business scheme, as more fully described in this Complaint.

35. Defendants are further subject to jurisdiction in this state on any other basis

authorized by law or not inconsistent with the constitutions of Tennessee or the United States under Tenn. Code Ann. §§ 20-2-214(a)(6) and -225, as more fully described in this Complaint.

TRADE AND COMMERCE

36. At all material times, Defendants, individually, collectively, and as agents of one another, have maintained a substantial course of trade or business in the offering for sale, and sale of, goods and services, including through the United States mail, in or affecting the conduct of trade or commerce in Tennessee.

COMMON ENTERPRISE AND INDIVIDUAL PARTICIPATION

37. At all material times, all Defendants have operated together as a common enterprise while engaging in the unfair, deceptive, and misleading acts and practices and other violations of law described in this Complaint.

38. Defendants have engaged in such alleged acts and practices through an interrelated network of entities, affiliates, and aliases that have, among other things, common or shared owners, employees, executives, advertising, company logos, business practices, legal counsel, letterhead, customer service, expertise, and offices.

39. Defendants Romero and Laura Romero (Individual Defendants) are also jointly and severally liable for the conduct of Local Records Office because they had the authority to formulate, direct, or control its activities, and knew or should have known of its unlawful conduct, but failed to stop it.

40. In addition or in the alternative, all Defendants are alleged to have assisted in and facilitated the unlawful acts and practices alleged in this Complaint, have received ill-gotten funds that are the proceeds of the unlawful acts and practices alleged in this Complaint, and have no legitimate claim to those funds.

DEFENDANTS' HISTORY OF UNLAWFUL CONDUCT

41. On or about January 14, 2008, Romero was licensed as a California real estate salesperson.

42. As a result of such licensing, Romero became very familiar with standard real estate sales practices including the preparation, execution, and recording of property deeds.

43. Romero's real estate business included the renegotiation of mortgage loan terms on behalf of financially distressed homeowners conditioned on their advance payment of a fee in the approximate amount of \$2,500.00.

44. Modification of secured loans in exchange for a fee paid in advance of the service being performed is generally considered an unlawful business practice.

45. On September 9, 2008, Romero formed LA Investors LLC d/b/a Local Records Office as a California limited liability company with a principal place of business at 15718 Paramount Boulevard, Paramount, California 90723.

46. Laura Romero helped Romero select "Local Records Office" as the fictitious name for LA Investors LLC.

47. On March 22, 2010, Romero filed a Statement of Information with the State of California Secretary of State identifying himself as LAI's Chief Executive Officer and wife Laura Romero as its Manager or Member.

48. Romero described Local Records Office's business as "Buy [sic] and sells houses."

49. Laura Romero also served as Local Records Office's Vice President.

50. All Defendants listed their address as 15718 Paramount Boulevard, Paramount, California 90723, in the Statement of Information.

51. On August 25, 2010, the Department of Real Estate of the State of California filed an Accusation against Romero for operating an unlicensed real estate business in California, and for claiming, demanding, charging, receiving, collecting, or contracting for the collection of advance fees with respect to loans that were secured by liens on real estate.

52. On February 9, 2011, Romero filed a Voluntary Petition for Chapter 7 bankruptcy in the United States Bankruptcy Court for the Central District of California. In his Amended Schedules, Romero listed assets totaling \$379,985 and debt totaling \$860,209. Romero also listed his wife, Laura Romero, as a 50% partner in Local Records Office. Romero was discharged in bankruptcy on August 3, 2011.

53. On July 27, 2011, Romero surrendered his real estate license to the Department of Real Estate of the State of California.

54. At approximately this same time, Romero began designing the invoice solicitations and envelopes which are at issue in this civil enforcement proceeding.

55. Romero designed his Tennessee solicitation to mimic an invoice and create the overall net impression that the solicitation was an official invoice from a local government office requiring the consumer to pay an \$89 fee for a copy of his/her deed and other publicly available property information.

56. Under the mistaken belief that he could limit his exposure from claims of unfair and deceptive business practices or violation of government impostor statutes, Romero included language in his Local Records Office's Tennessee mailings attempting to disclaim its affiliation with a legitimate government office and its appearance as an invoice for mandatory payment.

57. Romero did not provide similar disclaimers for his National Profile Document Tennessee mailings.

58. Defendants sent their government impostor invoices to tens of thousands of consumers throughout the country, including in Tennessee, using the names “Local Records Office” and “National Profile Document” to identify the sender, and a return address located in the capital city of each consumer’s home state. Defendants have realized millions of dollars in revenue as a result of these mailings.

THE NUMEROUS CONSUMER COMPLAINTS AGAINST LOCAL RECORDS OFFICE

59. Beginning in May 2012, the Federal Trade Commission (FTC), U.S. Postal Inspection Service, and Division of Consumer Affairs of the Tennessee Department of Commerce and Insurance (DCA) began receiving complaints from Tennessee consumers regarding the invoices received from Local Records Office, 533 Church Street, # 142, Nashville, TN, 37219.

60. Among other things, Tennessee consumers complained about receiving a bill from Local Records Office that “appear[ed] very official.” One Tennessee consumer observed that he “made recent changes to [his] personal deed and actually thought [the mailing] was from the County,” until reading the attempted disclaimer. This same consumer concluded that Local Records Office’s mailing was “[c]learly an attempt to trick the elderly and other people to think it is an actual bill.”

61. Another Tennessee consumer complained that while Local Records Office sought a fee of \$89 for a copy of the consumer’s property deed, the consumer could obtain a copy of her deed “from the local office for \$0.25 per page” and that Local Records Office “was charging [an] extreme amount for [a] copy of public records.”

62. Numerous Tennessee consumers have also complained to their county Register of Deeds offices about being charged \$89 by a government office for public records by Local

Records Office. Many of these consumers were in fact misled into believing that their local government records office had mailed a government invoice to them. Some consumers were so angry that they personally visited their local government records offices to complain about the mailing.

63. As of the time of filing this Complaint, at least 161 complaints had been filed with the FTC against Local Records Office and National Profile Document by consumers located throughout the country, including Tennessee. Numerous additional consumer complaints have been filed against LRO with government agencies, the Better Business Bureau, and various public internet complaint forums.

THE NUMEROUS LAW ENFORCEMENT PROCEEDINGS AGAINST LOCAL RECORDS OFFICE

64. As a result of these consumer complaints, various state and federal civil law enforcement authorities initiated investigations of and civil law enforcement proceedings against Local Records Office and Individual Defendants.

65. On November 25, 2012, the North Carolina Attorney General filed a Complaint against Local Records Office and Romero alleging they deceived North Carolina property owners into believing they should pay \$89 to Local Records Office for copies of their property deeds, which were available free of charge. On November 29, 2012, the North Carolina Attorney General obtained a temporary restraining order against Local Records Office and Romero, prohibiting them from, among other things, billing or invoicing North Carolina property owners for services related to their property deeds or their title to real estate.

66. On March 15, 2013, the Iowa Attorney General entered into an Assurance of Voluntary Compliance with Local Records Office and Romero for marketing real estate documents to Iowans under the guise of an official government agency. Among other things,

Romero and Local Records Office agreed to permanently refrain from billing, invoicing, or seeking payment from any person located in Iowa for services relating to such person's property deeds or title to real estate.

67. On June 26, 2013, the South Carolina Attorney General sent notice to Local Records Office and Romero that he was contemplating pursuing claims against them for unfair and deceptive practices related to letters they mailed that led South Carolina consumers to believe they were mailed from a government office.

68. On November 7, 2013, the Washington Attorney General filed a consumer protection enforcement action against Defendants. Among other things, the Washington Attorney General alleged Defendants deceived and misled Washingtonians by masquerading as a governmental agency and collecting a substantial fee for providing consumers copies of their real property deeds, which were available from local government offices for a nominal fee.

69. On February 12, 2016, the Thurston County Superior Court in Washington granted summary judgment to the Washington Attorney General against LRO and Romero, finding that their advertisements "created the deceptive net impression that Defendants' solicitations were from a governmental agency or were bills that Washington consumers were obligated to respond to or pay." Proceedings against Laura Romero are still pending. A copy of this February 12, 2016 Superior Court order is attached as **Exhibit 1**.

70. In addition to the enforcement actions described above, the Wisconsin Attorney General, the United States Postal Service, and the Contra Costa County District Attorney's Office in California have initiated investigations and/or lawsuits against Local Records Office, Romero, and/or Laura Romero regarding solicitations which appear to be government invoices that charge consumers an \$89 fee for copies of their property deeds and other public information

which is usually available for free or at a nominal cost.

**LOCAL RECORDS OFFICE'S FAILURE TO COOPERATE
WITH THE TENNESSEE ATTORNEY GENERAL'S INVESTIGATION**

71. On September 27, 2012, the DCA referred Local Records Office to the Attorney General for further investigation and enforcement.

72. On October 8, 2012, the Attorney General issued an investigative subpoena known as a Request for Consumer Protection Information (RCPI) pursuant to Tenn. Code Ann. § 47-18-106 to Local Records Office. Local Records Office's response to the investigative subpoena was due November 13, 2012.

73. On October 26, 2012, California attorney Eduardo Madrid wrote a letter to the Attorney General objecting to the RCPI because "it violates our client's federal constitutional rights to conduct business in [Tennessee]." Madrid requested the Attorney General identify the "nature of the investigation, the legal authority for such action and who, if anyone, has filed or lodged any complaints against my client." On November 5, 2012, the Attorney General responded to Madrid's request, providing the requested information with the exception of the identities of the complaining consumers.

74. Neither Local Records Office nor its attorney responded to the RCPI by November 13, 2012, nor to the Attorney General's November 5, 2012 letter. On December 5, 2012, the Attorney General wrote to Madrid about the failure to respond, and Madrid replied on December 10, 2012, by continuing to refuse to respond to the investigative subpoena and advising the Attorney General, "Your grasp of the obvious is amazing." The Attorney General wrote a letter to Madrid again on January 10, 2013, which he ignored.

75. On April 17, 2013, the Attorney General filed a Petition/Motion for an Order Compelling Compliance with the Attorney General's RCPI in Davidson County Circuit Court.

On August 8, 2013, after obtaining a continuance of the hearing on the Attorney General's Petition until August 16, 2013, Local Records Office filed a motion for protective order. Following another continuance request by Local Records Office, a hearing on the Attorney General's Petition and Local Records Office's motion was eventually set for August 30, 2013.

76. On August 27, 2013, three days before the hearing on the Attorney General's Petition was scheduled to begin, Local Records Office filed a complaint for declaratory judgment in the Shelby County Chancery Court against the State of Tennessee, seeking to enjoin the State from proceeding with any action involving LRO's mailings as well as a declaration of its rights under the TCPA. This case was transferred to Davidson County and ultimately dismissed.

77. On September 16, 2013, the Davidson County Circuit Court entered an order granting the Attorney General's Petition to compel responses to its RCPI, and denying Local Records Office's motion for protective order. During the following year, Defendants provided the Attorney General with most of the information required by the investigative subpoena. On December 9, 2014, the Davidson County Circuit Court approved an Agreed Final Order closing the matter before it and removing it from the docket.

PASSAGE OF THE GOVERNMENT IMPOSTOR ACT

78. In response to widespread consumer abuse through the use of government impostor invoices, the Tennessee General Assembly passed, and Governor Haslam approved, the Government Impostor Act on March 10, 2016.

79. The Government Impostor Act, among other things, prohibits any representation, implication, or other act or practice that causes a likelihood of confusion that any goods or services are approved, authorized, or endorsed, in whole or in part, by a governmental entity, when such is not true.

80. The Government Impostor Act, among other things, requires entities that legitimately sell publicly available government documents to include specific disclosures on all envelopes, advertisements, e-mails, and websites, to adequately inform Tennessee consumers that such entities are not associated with or approved by any Tennessee governmental entity. The underlying solicitations must contain no deceptions whatsoever.

81. Despite the passage of the Government Impostor Act on March 10, 2016, Defendants have continued to send thousands of solicitations to Tennessee consumers that do not comply with the provisions of the Act, including the posting of the statutory disclosure on all required places in their mailings and on their website.

DEFENDANTS' UNLAWFUL SOLICITATIONS AS A GOVERNMENT IMPOSTOR

82. Defendants have used their office in California and their UPS boxes in Nashville to engage in a years-long marketing campaign of soliciting Tennessee consumers via direct mail.

83. In order to target Tennessee consumers likely to respond to their invoices, Defendants use online databases such as Agentpro to identify and collect the names and addresses of Tennessee consumers who recently purchased or refinanced homes in Tennessee. Defendants purchase such lists periodically from Agentpro, then merge those consumers' names into their government look alike invoice, sending tens of thousands of their phony invoices to Tennessee consumers each year.

84. Defendants have solicited Tennessee consumers using deceptive invoice solicitations under the names "Local Records Office" and "National Profile Document" in an attempt to sell consumers a copy of their deed and other worthless property information.

85. In Tennessee, as in many other states, real property deeds are filed in the county where the property is located. Tennesseans can obtain a copy of a deed from that county's

Register of Deeds for little or no cost.

The Local Records Office Deceptive Government Invoice Solicitations

86. Tennessee consumers who receive mail from Local Records Office's purported office location at 533 Church Street, # 142, in Nashville typically see an envelope in the form depicted below as *Illustration 1*.¹

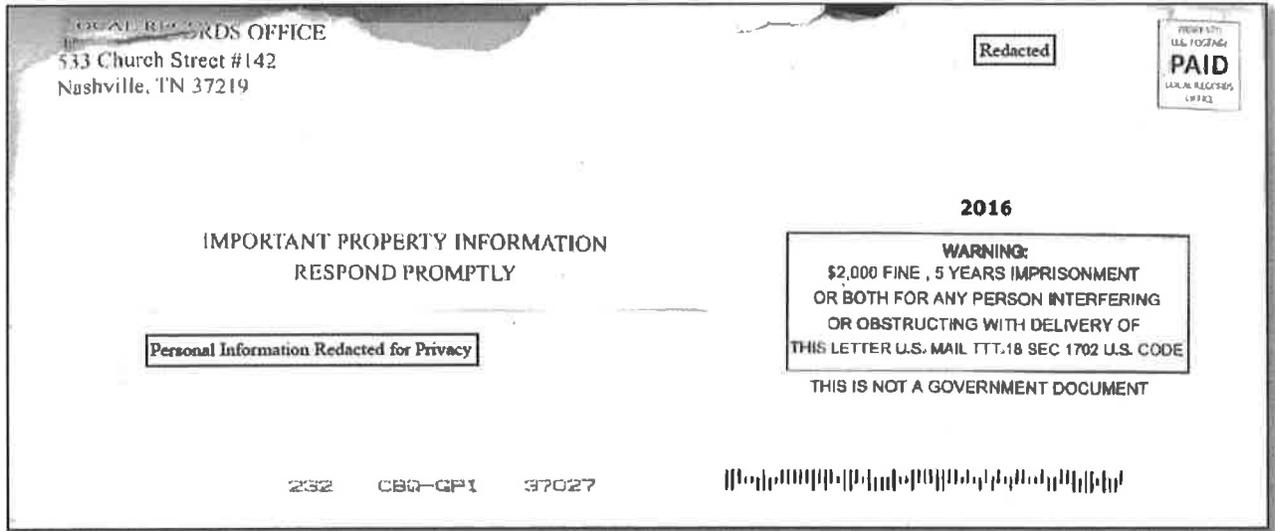


Illustration 1

87. One of the most prominent items displayed on this envelope is a “WARNING” of fines and imprisonment for tampering with the mailing, along with a citation to the Title 18 of the United States Code, as seen below in *Illustration 2*.

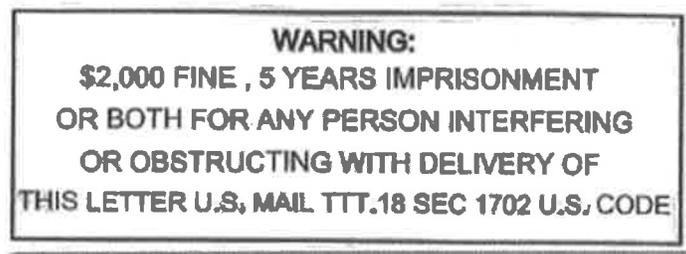


Illustration 2

¹ The consumer's identifying information is not shown on some portions of the solicitation for privacy reasons.

88. Directly above the consumer's name and address on this envelope is an alert that the envelope's contents include "IMPORTANT PROPERTY INFORMATION" and that the consumer must "RESPOND PROMPTLY", as seen below in *Illustration 3*.

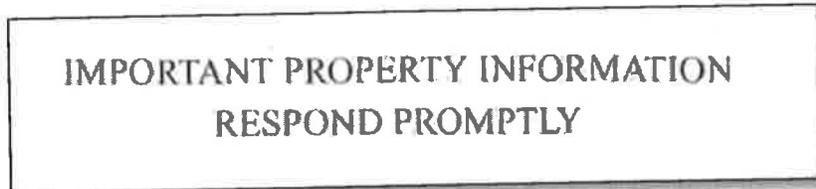


Illustration 3

89. The return address in the upper-left-hand corner of this envelope informs Tennessee consumers that the mailing came from "LOCAL RECORDS OFFICE" (spelled out in all capital letters), from a downtown Nashville address, as seen below in *Illustration 4*.



Illustration 4

90. Upon opening the envelope and removing the contents, each consumer sees a legal-sized (8½" by 14") single-page, double-sided document, which appears as follows in *Illustration 5*. One of this solicitation's most prominent, eye-catching features is its resemblance to an invoice. This resemblance contributes to a consumer's overall net impression that the document is an invoice or a bill that he or she is required to pay.

LOCAL RECORDS OFFICE
 533 Church Street #142
 Nashville, TN 37219
 Phone: (800) 790-0721

THIS SERVICE TO OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF TITLE IS NOT ASSOCIATED WITH ANY GOVERNMENTAL AGENCY. YOU CAN OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF YOUR TITLE FROM THE COUNTY RECORDER IN THE COUNTY WHERE YOUR PROPERTY IS LOCATED.



7050216-LR TUN16561019 DIGIT-2

Redacted for Privacy

Please Respond By:

11/28/2016

LOCAL RECORDS OFFICE

Local Records Office provides a copy of the only document that identifies ^{Redacted for Privacy} as the property owner of 1 ^{Redacted for Privacy} by a recently recorded transferred title on the property.

Local Records Office provides a property profile where you can find the property address, owner's name, comparable values, and legal description or parcel identification number, property history, neighborhood demographics, public and private schools report.

Records obtained through public information show a deed was recorded in your name ^{Redacted for Privacy} on 2016-09-28 which indicates your ownership and interest in the specified property below.

HAMILTON PUBLIC INFORMATION

Legal Property Address:

Redacted for Privacy

Purchase or Transfer Date:	2016-09-28	Year Built:	1952	Property ID:	1471 D 004
Dee Number:	2016092800197	Lot Sq. Ft:	N/A	Improvements:	\$0
Sale Amount:	N/A	Square Feet:	2967 SF	Use Code:	1001
Assessed Value:	\$55,750	Pool:	N/A	2nd Owner Name:	Redacted for Privacy

For a complete property profile and an additional copy the only document that identifies you as a property owner usually called deed, please detach coupon and return with an \$89 processing fee in the envelope provided. You will receive your documents and report within 21 business days.

Upon receipt of your processing fee, your request will be submitted for documents preparation and reviewed. If for any reason your request for deed and property profile cannot be obtained, your processing fee will be immediately refunded.

LOCAL RECORDS OFFICE IS NOT AFFILIATED WITH THE COUNTY IN WHICH YOUR DEED IS FILED IN, NOR AFFILIATED WITH ANY GOVERNMENT AGENCIES. THIS OFFER SERVES AS A SOLICITING FOR SERVICES AND NOT TO BE INTERPRETED AS BILL DUE. THIS PRODUCT OR SERVICE HAS NOT BEEN APPROVED OR ENDORSED BY ANY GOVERNMENTAL AGENCY, AND THIS OFFER IS NOT BEING MADE BY AN AGENCY OF GOVERNMENT. THIS IS NOT A BILL THIS IS A SOLICITATION YOU ARE UNDER NO OBLIGATION TO PAY THE AMOUNT STATED, UNLESS YOU ACCEPT THIS OFFER.

Please detach coupon and mail with your check



CODE: TUN16561019-2

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	CHECK NO.
1471 D 004	\$ 89.00	11/28/2016	

Redacted for Privacy

MAKE CHECK PAYABLE TO:

LOCAL RECORDS.
 533 Church Street #142
 Nashville, TN 37219

Please check box if your mailing address is different and print mailing address on reverse side.

Your Phone Number: () _____
 Please write the PROPERTY ID NO. On the lower left corner of your check.

Local Records Office: In the United States anyone can have access to the records of any Real Property. The Real Property is usually recorded in the County records where Local Records Office runs powerful on-line searches to find the Deed of millions of people throughout The United States and gathers at the same time several Characteristics of the property such as: Property Characteristics, Property History, Sale Loan Amount, Assessment and Tax Information, Nearby Neighbors, Comparable Sale Data, Neighborhood Demographics, Private and Public Schools reports, Plat Maps, and others. These are sent to thousands of new property owners.

Real property is property that includes land and buildings, and anything affixed to the land. Real property only includes those structures that are affixed to the land, not those which can be removed, such as equipment.

Real Property Records are generally filed with and kept on a county level; they originate from two major governmental sources: County Recorder's or Courthouse and Property (Tax) Assessor's offices.

Property Title refers to a formal document that serves as evidence of ownership. Conveyance of the document may be required in order to transfer ownership in the property to another person. Title is distinct from possession, a right that often accompanies ownership but is not necessarily sufficient to prove it. In many cases, both possession and title may be transferred independently of each other.

Property deeds are legal instruments that are used to assign ownership of real property, to transfer title to the land and its improvements such as a house. Words used to convey property transfer may be grant, assign, convey or warrant, but they basically all do the same thing, they transfer the interest of the person selling the house to the person buying the house.

Types of property ownership:

- a) **Sole Ownership:** The simplest form of property ownership, sole ownership grants one individual complete rights over the property in question.
- b) **Tenancy by the Entireties:** When a married couple purchases real estate together, they are granted tenancy by the entireties by many states. This means that each party holds one-half interest in the property, but neither can dispose of or otherwise abridge the right of the other to the property.
- c) **Tenancy in Common:** This form of ownership allows multiple people to own a percentage of the same property. While the percentage owned may vary, each person has an equal right to the property during their lifetime. If one of the tenants in common dies, their interest in the property passes to their heirs; it does not devolve to the other tenants in common.
- d) **Joint Tenancy:** Joint tenancy agreements require that four conditions be met: ownership must be received at the same time, tenants must hold an equal interest, tenants must each be named on the title, and all must have exactly the same rights of possession. Unlike tenants in common, joint tenants have right of survivorship; the ownership of the property passes to the remaining joint tenants in the event of the death of one of the owners. One joint tenant can buy out another, or legal proceedings can be instituted to dissolve the joint tenancy. If one participant sells his or her interest in the property to another person, the joint tenancy is converted into a tenancy in common, and the right of survivorship is no longer valid; the other tenants have no recourse against this action by one or more of their number.
- e) **Community Property:** In some states, real estate purchased by a married couple becomes community property. This form of ownership basically creates a condition where the real estate (and other property, if applicable) is owned by the partnership created by the marriage. If the marriage is dissolved through divorce, the value of the property must be divided between the partners. Community property ownership may give right of survivorship, essentially giving the entirety of the property to the surviving spouse in the event of death; other forms allow the partners to leave their interest in the property to their heirs after they die.
- f) **Tenancy in Severalty:** Absolute and sole ownership of property by a legal entity, without cotenants, joint-tenants, or partners.

DISCLAIMER: Local Records Office is not affiliated with any State or the United States or the County Records. Local Records Office is an analysis and retrieval firm that uses multiple resources that provide supporting values, deeds and evidence that is used to ensure a property reports and deliver a requested deed. Local Records Office is not affiliated with the county in which your deed is filed in, nor affiliated with any government agencies. This offer serves as a soliciting for services and not to be interpreted as bill due. This Service to obtain a copy of your Deed or other record of Title is not associated with any Governmental Agency. You can obtain a Copy of your Deed or other Record of your Title from the County Recorder in the County where your property is Located. The price varies depending on each county rate. This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by agency of government. This is not a bill. This is a solicitation; you are under no obligation to pay the amount stated, unless you accept this offer.

<i>Mailing Address</i>		
<i>Address:</i>		
<i>City:</i>	<i>State:</i>	<i>Zip Code:</i>

Illustration 5

91. As a consumer looks at the front page of the solicitation, one of the most prominent and eye-catching features are the demands for prompt response, as seen below in *Illustration 6*.

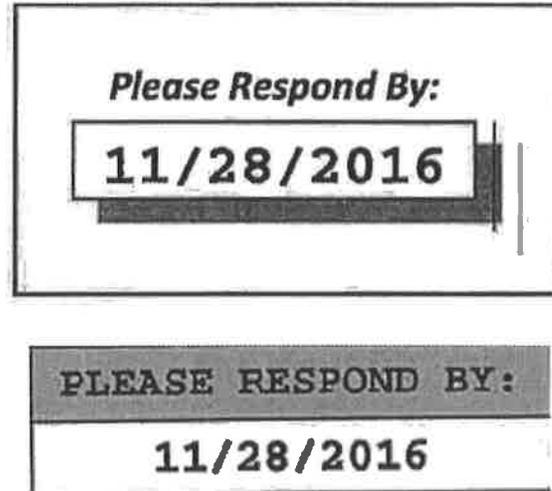


Illustration 6

92. These response deadlines in *Illustration 6* further reinforce a consumer's overall net impression that this mailing is a time-sensitive invoice that must be paid by a fixed deadline.

93. A variation of Defendants' trade name, "LOCAL RECORDS," and Nashville, Tennessee address appear on the upper left corner of the page in bold type, and further reinforce a consumer's overall net impression that this mailing originates from a government entity, as seen below in *Illustration 7*.

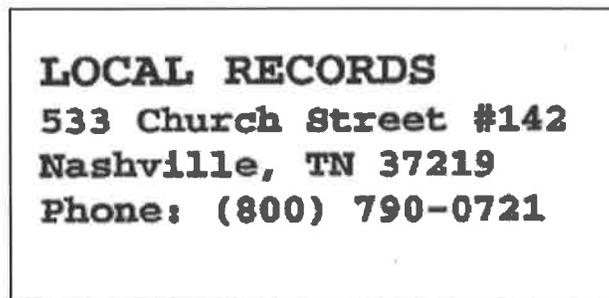


Illustration 7

94. The similar trade name, “**LOCAL RECORDS OFFICE**,” in bold, capital letters, and the downtown Nashville, Tennessee return address further reinforce a consumer’s overall net impression that this solicitation originates from a government entity and is an invoice that requires prompt response.

95. Defendants’ solicitation also includes customized consumer and property information, specific only to the receiving consumer and the parcel of property involved, such as the exact purchase or transfer date, the year the consumer’s home was built, the assessed value of the property, the legal address of the property, whether the property has a second owner, and even whether the property has a pool, as seen below in *Illustration 8*.

HAMILTON PUBLIC INFORMATION					
Legal Property Address:	Redacted for Privacy				
Purchase or Transfer Date:	2016-09-28	Year Built:	1952	Property ID:	1471 D 004
Doc Number:	2016092800197	Lot Sq. Ft:	N/A	Improvements:	\$0
Sale Amount	N/A	Square Feet:	2967 SF	Use Code:	1001
Assessed Value:	\$55,750	Pool:	N/A	2nd Owner Name:	Redacted for Privacy

Illustration 8

96. Some of this public information is accurate, and is included in Defendants’ mailings to provide the consumer with a false sense of security in concluding that the document is, in fact, an invoice or comes directly from a local government records office.

97. Some of this public information, such as the “Property ID” and the “Use Code,” is phony, and does not constitute legitimate reference numbers or appear on actual property deeds in Tennessee, but is nevertheless included in Defendants’ mailings to provide the consumer with a false sense of security in concluding that the document is, in fact, an invoice or comes directly from a local government records office.

98. This official-looking information in *Illustration 8* reinforces a consumer's overall net impression that this solicitation originates from a government entity and is an invoice that requires response.

99. A consumer reading the front of this solicitation sees that Local Records Office represents it "provides a copy of the *only document* that identifies [the consumer] as the property owner" of a specific parcel of real property, as seen below in *Illustration 9* (emphasis added).

Local Records Office provides a copy of the only document that identifies Redacted for Privacy as the property owner of 1 Redacted for Privacy by a recently recorded transferred title on the property.

Illustration 9

100. Local Records Office does not provide a copy of the only document that identifies the consumer as the property owner of a specific parcel of real property, thereby causing the representation in *Illustration 9* to be false and deceptive.

101. Below this language, a consumer reading the front of Local Records Office's mailing sees that Defendants possessed public records that indicated the consumer's purchase of a specific parcel of real property, as seen below in *Illustration 10*.

Records obtained through public information show a deed was recorded in your name Redacted for Privacy on 2016-09-28 which indicates your ownership and interest in the specified property below.

Illustration 10

102. The information in *Illustrations 9–10* further reinforces a consumer's overall net impression that this solicitation originates from a government entity and is an invoice that requires response.

103. Near the bottom of the first page of Defendants' solicitation, a consumer sees a detachable coupon which include instructions that he or she should "detach [the] coupon and mail [it in] with [his/her] check," as seen below in *Illustration 11*.

Please detach coupon and mail with your check



CODE: TUN16561019-2

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	CHECK NO.
147I D 004	\$ 89.00	11/28/2016	

Redacted for Privacy

Please check box if your mailing address is different and print mailing address on reverse side.

MAKE CHECK PAYABLE TO:

LOCAL RECORDS.
533 Church Street #142
Nashville, TN 37219

Your Phone Number: () _____

Please write the PROPERTY ID NO. On the lower left corner of your check.

Illustration 11

104. This detachable coupon references an \$89 “service fee,” displays a nonfunctioning bar code, a meaningless numerical code, and a phony due date, and provides instructions to make a check payable to “Local Records,” as seen below in *Illustrations 12* and *13*.



CODE: TUN16561019-2

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	CHECK NO.
147I D 004	\$ 89.00	11/28/2016	

Illustration 12

MAKE CHECK PAYABLE TO:
LOCAL RECORDS
533 Church Street #142
Nashville, TN 37219

Illustration 13

105. The misleading information in *Illustrations 12–13* further reinforces a consumer’s

overall net impression that this solicitation originates from a government entity and is an invoice that requires a prompt response.

106. Defendants also provide consumers with a list of legal terms and definitions relating to real property on the back side of their mailing, as seen above in *Illustration 5*. This information further reinforces a consumer's overall net impression that this solicitation originates from a government entity and is an invoice that requires response.

107. As seen above in *Illustration 5*, the front page of the solicitation contains two lengthy statements in tight all-capital letters that include a phrase attempting to disclaim Defendants' affiliation with the government. Another phrase attempts to disclaim the solicitation's appearance as an invoice. The last paragraph of the back page of the solicitation contains a paragraph with language also attempting to disclaim Defendants' affiliation with the government and the solicitation's appearance as an invoice.

108. Defendants' Local Records Office solicitations², as identified by *Illustrations 1–13*, create the overall net impression that the solicitation is a bill to which consumers must respond with payment when such is not the case.

109. Defendants' Local Records Office solicitations, as identified by *Illustrations 1–13*, also create the overall net impression that LRO is or is affiliated with a governmental entity of the State of Tennessee or a county in Tennessee when such is not the case.

110. Although Defendants include some language in the Local Records Office solicitations attempting to disclaim Defendants' affiliation with the government and the solicitation's appearance as an invoice, Defendants include conflicting messages and terminology in their mailings, including their use of the government sound alike trade name

² A copy of the complete solicitation is attached as **Exhibit 2**.

“Local Records Office,” which confuse and mislead consumers into believing the mailing are invoices from the government.

111. Defendants fail to clearly and conspicuously disclose that their solicitation is not an official government mailing and that consumers are not required to pay Defendants for a copy of their deed.

112. In fact, no included language could disclaim this solicitation’s overall net impression that it is a bill that originates from or is approved by the government. Defendants’ entire solicitation is designed to deceive consumers into purchasing a worthless product.

113. Nonetheless, Defendants’ Local Records Office solicitations, as identified by *Illustrations 1–13*, fail to incorporate the required disclosure provided in the Government Impostor Act and otherwise violate the requirements and prohibitions in the Government Impostor Act.

The National Profile Document Deceptive Invoice Solicitations

114. Tennessee consumers who receive mail from National Profile Document’s purported office location at 5133 Harding Pike, Ste. B10-281, in Nashville typically see a single-page, double-sided document, which appears as follows in *Illustration 14*.

National Profile Document
 5133 Harding Pike Ste. B10-281
 Nashville, TN 37205
 Phone: (800) 646-2794
 www.National-Profile.com

Respond By:
12/12/2013

12

December						
S	T	W	T	F	S	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				



NPD-TUN57661106 - Digit 2379

Redacted for Privacy

The National Profile Document's most recent information shows that Redacted for Privacy as the property owner of Redacted for Privacy by a recently recorded transferred title on the property.

National Profile Document provides a property profile where you can verify the property address, owner's name, comparable values, and legal description or parcel identification number, property history, neighborhood demographics, public and private schools report.

Records obtained through public information shows that a document was recorded in your name Redacted for Privacy on 10/10/2013 which indicates your ownership and interest in the specified property below.

DAVIDSON COUNTY PUBLIC INFORMATION

Legal Property Address: Redacted for Privacy

TRANSFER INFORMATION		PROPERTY CHARACTERISTIC	
Property ID:	073-01-0-180-00	Year Built:	1990
Purchase or Transfer Date:	10/10/2013	Lot Size:	10890 SF
Doc Number:	2013-10100106505	Square Feet:	1300 SF
Transfer Amount:	N/A	Use Code:	3001
Second Owner:	Redacted for Privacy	Pool:	N/A

For a complete property profile and a free copy of the recorded document that identifies you as a property owner, please detach coupon and return with a \$88 processing fee in the envelope provided. You will receive your report and document within 21 business days.

Upon receipt of your processing fee, your request will be submitted for documents preparation and review. If for any reason your property profile request cannot be obtained, your processing fee will be immediately refunded.

THIS OFFER SERVES AS A SOLICITING FOR SERVICES AND NOT TO BE INTERPRETED AS BILL DUE. THIS PRODUCT OR SERVICE HAS NOT BEEN APPROVED OR ENDORSED BY ANY GOVERNMENTAL AGENCY, AND THIS OFFER IS NOT BEING MADE BY AN AGENCY OF GOVERNMENT. THIS IS NOT A BILL. THIS IS A SOLICITATION YOU ARE UNDER NO OBLIGATION TO PAY THE AMOUNT STATED, UNLESS YOU ACCEPT THIS OFFER.

Please detach coupon and mail with your payment



CODE: TUN57661106

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	AMOUNT PAID:
073-01-0-180-00	\$ 88.00	12/12/2013	

Redacted for Privacy

MAKE CHECK PAYABLE TO:

NATIONAL PROFILE DOCUMENT
 5133 Harding Pike Ste. B10-281
 Nashville, TN 37205

Please check box if your mailing address is different and print mailing address on reverse side.

Your Phone Number: _____

Please write the PROPERTY ID NO. On the lower left corner of your check.

National Profile Document: In the United States anyone can have access to the records of any Real Property. The Real Property is usually recorded in the County records where National Profile Document runs powerful on-line searches to find the recorded documents of millions of people throughout the United States and gathers at the same time several characteristics of the property such as: Property Characteristics, Property History, Sale Loan Amount, Assessment and Tax Information, Nearby Neighbors, Comparable Sale Data, Neighborhood Demographics, Private and Public Schools reports, Plat Map, and others. Those are sent to thousands of new property owners.

Real Property is property that includes land and buildings, and anything affixed to the land. Real property only includes those structures that are affixed to the land, not those which can be removed, such as equipment.

Real Property Records are generally filed with and kept on a county level; they originate from two major governmental sources: County Recorder's or Court House and Property (Tax) Assessor's offices.

Property Title refers to a formal document that serves as evidence of ownership. Conveyance of the document may be required in order to transfer ownership in the property to another person. Title is distinct from possession, a right that often accompanies ownership but is not necessarily sufficient to prove it. In many cases, both possession and title may be transferred independently of each other.

Property Deeds are legal instruments that are used to assign ownership of real property, to transfer title to the land and its improvements such as a house. Words used to convey property transfer may be grant, assign, convey or warrant, but they basically all do the same thing, they transfer the interest of the person selling the house to the person buying the house.

Types of property ownership:

- a) **Sole Ownership:** The simplest form of property ownership, sole ownership grants one individual complete rights over the property in question.
- b) **Tenancy by the Entireties:** When a married couple purchases real estate together, they are granted tenancy by the entireties by many states. This means that each party holds one-half interest in the property, but neither can dispose of or otherwise abridge the right of the other to the property.
- c) **Tenancy in Common:** This form of ownership allows multiple people to own a percentage of the same property. While the percentage owned may vary, each person has an equal right to the property during their lifetime. If one of the tenants in common dies, their interest in the property passes to their heirs; it does not devolve to the other tenants in common.
- d) **Joint Tenancy:** Joint tenancy agreements require that four conditions be met: ownership must be received at the same time, tenants must hold an equal interest, tenants must each be named on the title, and all must have exactly the same rights of possession. Unlike tenants in common, joint tenants have right of survivorship; the ownership of the property passes to the remaining joint tenants in the event of the death of one of the owners. One joint tenant can buy out another, or legal proceedings can be instituted to dissolve the joint tenancy. If one participant sells his or her interest in the property to another person, the joint tenancy is converted into a tenancy in common, and the right of survivorship is no longer valid; the other tenants have no recourse against this action by one or more of their number.
- e) **Community Property:** In some states, real estate purchased by a married couple becomes community property. This form of ownership basically creates a condition where the real estate (and other property, if applicable) is owned by the partnership created by the marriage. If the marriage is dissolved through divorce, the value of the property must be divided between the partners. Community property ownership may give right of survivorship, essentially giving the entirety of the property to the surviving spouse in the event of death; other forms allow the partners to leave their interest in the property to their heirs after they die.
- f) **Tenancy in Severalty:** Absolute and sole ownership of property by a legal entity, without cotenants, joint-tenants, or partners.

DISCLAIMER: * National Profile Document is not affiliated with any United States' County or State. National Profile Document is an analysis and retrieval firm that uses multiple resources that provide supporting values and evidence that is used to create a property reports and deliver a requested document.

This offer serves as a soliciting for services and not to be interpreted as bill due. This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by agency of government. This is not a bill. This is a solicitation; you are under no obligation to pay the amount stated, unless you accept this offer. National Profile Document operates in accordance to both business and professions code.

For more information visit us at: <http://www.national-profile.com>

Mailing Address		
Address:		
City:	State:	Zip Code:

Illustration 14

115. One of the National Profile Document solicitation’s most prominent and eye-catching features is its resemblance to an invoice. This resemblance contributes to a consumer’s overall net impression that the document is a bill that he or she is required to pay.

116. As a consumer looks at the front page of the solicitation, one of the most prominent and eye-catching features are the demands for prompt response, as seen below in *Illustration 15*.

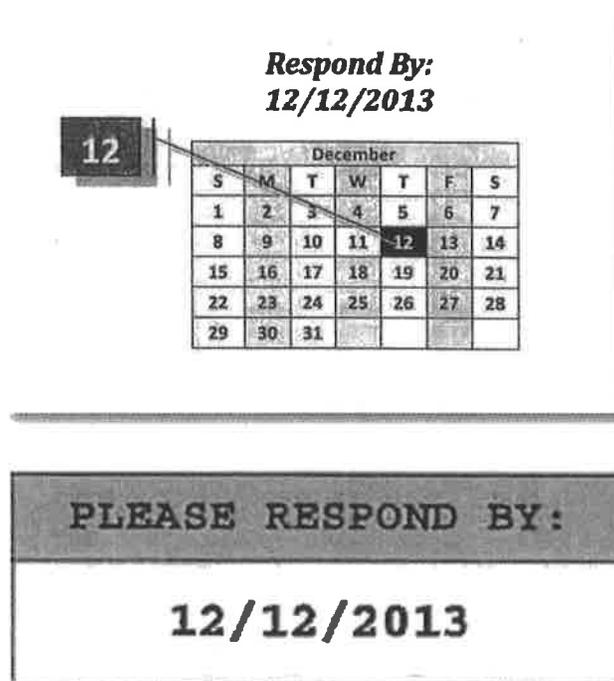


Illustration 15

117. These response deadlines in *Illustration 15* further reinforce a consumer’s overall net impression that this solicitation originates from a government entity and is an invoice that requires response.

118. Defendants’ trade name and Nashville, Tennessee address, along with a phony bar code, appears on the upper left of the page, as seen below in *Illustration 16*.

National Profile Document

5133 Harding Pike Ste. B10-281
Nashville, TN 37205
Phone: (800) 640-2794
www.National-Profile.com



NPD-TUN57661106 - Digit 2379

Illustration 16

119. This trade name and return address reinforce a consumer’s net impression that this solicitation is an invoice that requires response.

120. Defendants’ solicitation includes the recipient consumer’s unique, property-specific information such as the purchase date, county of the property, co-owner, etc., as seen below in *Illustration 17*.

DAVIDSON COUNTY PUBLIC INFORMATION			
Legal Property Address:		Redacted for Privacy	
TRANSFER INFORMATION		PROPERTY CHARACTERISTIC	
Property ID:	073-01-0-180-00	Year Built:	1950
Purchase or Transfer Date:	10/10/2013	Lot Size	10890 SF
Doc Number:	2013-10100106505	Square Feet:	1300 SF
Transfer Amount	N/A	Use Code:	1001
Second Owner:	Redacted for Privacy	Pool:	N/A

Illustration 17

121. Some of this public information, such as the “Property ID” and the “Use Code” are not legitimate reference numbers and do not appear on real property deeds in Tennessee.

122. This official-looking information in Illustration 8 further reinforces a consumer’s

overall net impression that this solicitation originates from a government entity and is an invoice that requires response.

123. Near the bottom of the first page of Defendants’ National Profile Document solicitation, a consumer sees a detachable coupon and instructions from Defendants that he/she should “detach [the] coupon and mail [it in] with [his/her] payment,” as seen in *Illustration 18*.

Please detach coupon and mail with your payment


CODE: TUN57661106

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	AMOUNT PAID:
073-01-0-180-00	\$ 88.00	12/12/2013	

Redacted for Privacy

MAKE CHECK PAYABLE TO:
NATIONAL PROFILE DOCUMENT
 5133 Harding Pike Ste. B10-281
 Nashville, TN 37205

Please check box if your mailing address is different and print mailing address on reverse side.

Your Phone Number: () _____

Please write the PROPERTY ID NO. On the lower left corner of your check.

Illustration 18

124. This detachable coupon references an \$88 “service fee,” displays a nonfunctioning bar code, a meaningless numerical code, and a due date, and provides instructions to make a check payable to “National Profile Document,” as seen below in *Illustrations 19* and *20*.


CODE: TUN57661106

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	AMOUNT PAID:
073-01-0-180-00	\$ 88.00	12/12/2013	

Illustration 19

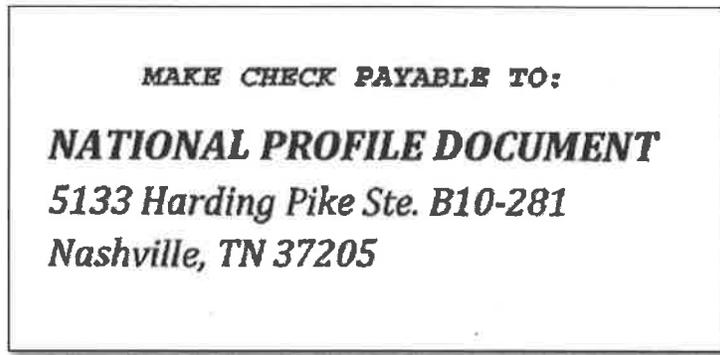


Illustration 20

125. The information in *Illustrations 19–20* further reinforces a consumer’s overall net impression that this solicitation is an invoice that requires response.

126. Defendants provide consumers with a list of legal terms and definitions relating to real property on the back side of the solicitation, as seen above in *Illustration 14*. This information further reinforces a consumer’s overall net impression that this solicitation is an invoice that requires response.

127. As seen above in *Illustration 14*, the front page of the solicitation contains one lengthy statement in tight all-caps lettering that includes a phrase attempting to disclaim the solicitation’s appearance as an invoice. The last paragraph of the back page of the solicitation contains a paragraph with language also attempting to disclaim the solicitation’s appearance as an invoice.

128. Defendants’ National Profile Document solicitations³, as identified by *Illustrations 14–20*, create the overall net impression that the solicitation is a bill to which consumers must respond with payment.

129. Although Defendants include some language in the National Profile Document

³ A copy of the complete solicitation is attached as **Exhibit 3**.

solicitations attempting to disclaim the solicitation's appearance as an invoice, Defendants fail to clearly and conspicuously disclose that this solicitation is not an invoice that requires the consumer's response.

130. In fact, no included language could disclaim this solicitation's overall net impression as a bill. Defendants' entire solicitation is designed to deceive consumers into purchasing a worthless product.

DEFENDANTS' CONTINUOUS UNLAWFUL ADVERTISING

131. Defendants have continuously and regularly advertised in Tennessee in the illegal manner described above through the date of the filing of this enforcement action.

CONSUMER INJURY

132. Tennessee consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the Government Impostor Act and the TCPA. In addition, Defendants have been unjustly enriched as a result of their unlawful acts and practices. Absent relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public.

COUNT I

Violations of Government Impostor and Deceptive Advertisements Act Tenn. Code Ann. § 47-18-131

133. Plaintiff, the State of Tennessee, adopts by reference and re-alleges every allegation contained in paragraphs 1–132 of this Complaint.

134. By representing, implying, or otherwise causing a likelihood of confusion that the person using or employing the advertisement is a part of or associated with a unit of any governmental entity, when such is not true, Defendants have violated the Government Impostor Act, Tenn. Code Ann. § 47-18-131(c)(1)(B).

135. By representing, implying, or otherwise causing a likelihood of confusion that goods, services, advertisements, or offers were sent or distributed by or have been approved, authorized, or endorsed, in whole or in part, by a governmental entity, when such is not true, Defendants have violated the Government Impostor Act, Tenn. Code Ann. § 47-18-131(c)(2).

136. By using or employing language, symbols, logos, representations, statements, titles, names, seals, emblems, insignia, trade or brand names, business or control tracking numbers, web sites or email addresses, or any other term, symbol or content that represents or implies or otherwise causes a likelihood of confusion that goods, services, advertisements, or offers are from a governmental entity, when such is not true, Defendants' have violated the Government Impostor Act, Tenn. Code Ann. § 47-18-131(c)(3).

137. By failing to provide the disclosure described in subdivision (c)(4)(B) either in the largest font type on the entire advertisement, but in no event smaller than bold fourteen (14) point black type, when offering documents that are available free of charge or at a lesser price from a governmental entity on the front and outside of a mailing envelope, at the top of an e-mail message, on each web page, and on the top of each page of any advertisement, Defendants have violated the Government Impostor Act, Tenn. Code Ann. § 47-18-131(c)(4)(A).

138. By failing to include the following disclosure in accordance with subdivision (c)(4)(A), Defendants have violated the Government Impostor Act, Tenn. Code Ann. § 47-18-131(c)(4)(B):

IMPORTANT NOTICE:

These documents offered by this advertisement are available to Tennessee consumers free of charge or for a lesser price from (insert name, telephone number, and mailing address of the applicable governmental entity). You are NOT required to purchase anything from this company and the company is NOT affiliated, endorsed, or approved by any governmental entity. The item offered in this

advertisement has NOT been approved or endorsed by any governmental agency, and this offer is NOT being made by an agency of the government.

139. By actively participating in, approving, directing, or otherwise controlling the acts and practices referenced in paragraphs 1–132 on behalf of LRO, Defendants Romero and Laura Romero are individually liable for those acts and practices, as they apply to the Government Impostor Act violations asserted in this Complaint.

COUNT II
Violations of Tennessee Consumer Protection Act
Tenn. Code Ann. § 47-18-104(a) and (b)

140. Plaintiff, the State of Tennessee, adopts by reference and re-alleges every allegation contained in paragraphs 1–132 of this Complaint.

141. By stating, implying, or creating the overall net impression that their solicitations originate from or are affiliated with a department of the State of Tennessee or other governmental entity, Defendants have violated Tenn. Code Ann. § 47-18-104(a), (b)(1), (b)(3), (b)(4), (b)(5), (b)(12), and (b)(27).

142. By stating, implying, or creating the overall net impression that their solicitations are a bill or invoice to which consumers are required to respond with payment, Defendants have violated Tenn. Code Ann. § 47-18-104(a), (b)(1), (b)(3), (b)(5), (b)(12), and (b)(27).

143. By using the trade name “LOCAL RECORDS OFFICE” in their communications with Tennessee consumers, Defendants mislead and deceive Tennessee consumers into believing Defendants’ communications are from a local Tennessee government office, in violation of Tenn. Code Ann. § 47-18-104(a), (b)(1), (b)(3), (b)(4), (b)(5), (b)(12), and (b)(27).

144. By representing, implying, or creating the overall net impression that Defendants’ deeds and other property information have approval, characteristics, uses, or benefits that they do not have, Defendants have violated Tenn. Code Ann. § 47-18-104(a), (b)(5), and (b)(27).

145. By failing to register as a foreign limited liability company with the Tennessee Secretary of State when required to do so, Defendants have violated Tenn. Code Ann. § 47-18-104(a), (b)(2), (b)(3), (b)(4), (b)(5), and (b)(27).

146. By actively participating in, approving, directing, or otherwise controlling the acts and practices referenced in paragraphs 1–132 on behalf of LRO, Defendants Romero and Laura Romero are individually liable for those acts and practices as they apply to the TCPA violations asserted in this Complaint.

PRAYER FOR RELIEF

Therefore, Plaintiff, State of Tennessee, pursuant to Tenn. Code Ann. §§ 47-18-108(a) and (b), -114, and -131, and this Court’s own equitable powers, requests that this Court:

A. Enter judgment against each Defendant and in favor of the State of Tennessee for each violation alleged in this Complaint;

B. Grant the State of Tennessee such injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action, and to preserve the possibility of effective final relief;

C. Enter a permanent injunction to prevent future violations of the Government Impostor Act and the TCPA by Defendants;

D. Award such relief as the Court finds necessary to redress consumer injury resulting from Defendants’ violations of the Government Impostor Act and the TCPA including, but not limited to, rescission or reformation of contracts, restitution including pre-judgment statutory interest and the costs of a restitution administrator to effectuate redress pursuant to Tenn. Code Ann. § 47-18-108(b)(1), refund of monies paid, and disgorgement of ill-gotten gains;

E. Adjudge and decree that each Defendant has engaged in the aforementioned acts

and practices which violate the Government Impostor Act and the TCPA;

F. Adjudge and decree that each Defendant was placed on notice that their aforesaid conduct was in violation of the Government Impostor Act and the TCPA, and that their continuing violations of the law after said notice have been knowing and persistent;

G. Adjudge and decree that each Defendant separately pay civil penalties of not more than \$100 for each person who received a written or electronic advertisement from Defendants in violation of the Government Impostor Act as provided by Tenn. Code Ann. § 47-18-131(f)(2)(A);

H. Adjudge and decree that each Defendant separately pay civil penalties of not more than \$1,000 per violation to the State of Tennessee for each violation of the TCPA as provided by Tenn. Code Ann. § 47-18-108(b)(3);

I. Adjudge and decree that, when any Defendant knowingly used a method, act, or practice which targeted elderly persons, that each Defendant separately pay civil penalties of not more than \$10,000 for each violation of the TCPA as provided by Tenn. Code Ann. § 47-18-125(a);

J. Enter judgment against Defendants and in favor of the State of Tennessee for the reasonable costs and expenses of the investigation and prosecution of Defendants' actions, including attorneys' fees, expert and other witness fees, and costs, as provided by Tenn. Code Ann. §§ 47-18-108(a)(5), (b)(4), and -131(f)(2)(B);

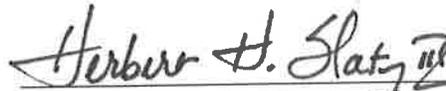
K. Order that this Complaint be filed without cost bond as provided by Tenn. Code Ann. §§ 20-13-101, 47-18-108, and 47-18-116;

L. Order that all costs in this case be taxed against Defendants and no costs be taxed to the State of Tennessee as provided in Tenn. Code Ann. § 47-18-116; and

M. Award the State of Tennessee such other and additional relief as the Court may

determine to be just and proper.

Respectfully submitted,



HERBERT H. SLATTERY III
Attorney General and Reporter
B.P.R. No. 9077



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Attorneys for Plaintiff, State of Tennessee

Exhibit 1

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RICHARD B. BAO - CLERK

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EXPEDITE
No hearing set
 Hearing Set
Date: 12/18/15
Time: 9:00 a.m.
Judge/Calendar: Hon. Mary Sue Wilson

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

LA INVESTORS, LLC, d/b/a LOCAL RECORDS OFFICE; and ROBERTO ROMERO, a/k/a JUAN ROBERTO ROMERO ASCENCIO, individually and as a Member and Manager of LA INVESTORS, LLC, and on behalf of the marital community comprised of Roberto Romero and Laura Romero; and LAURA ROMERO, individually and as a Member and Manager of LA INVESTORS, LLC and on behalf of the marital community comprised of Roberto Romero and Laura Romero.

Defendants.

NO. 13-2-02286-6

ORDER GRANTING PLAINTIFF
STATE OF WASHINGTON MOTION
FOR SUMMARY JUDGMENT

~~PROPOSED~~

MSW

This matter, having come before the Court on the State of Washington's Motion for Summary Judgment, and the Court having heard the arguments, if any, of the parties, and considered the following material:

1. Declaration of John Nelson and exhibits attached thereto;
2. Declaration of Anthony Pratkanis and exhibits attached thereto;
3. Declaration of Lesli Ashley and exhibits attached thereto;

- 1 4. Declaration of Asta Margaryan;
- 2 5. Declaration of Jennifer Richter;
- 3 6. Declaration of Melanie Muzatko;
- 4 7. Declaration of Jason Bernstein;
- 5 8. Declaration of Daniel Bohm;
- 6 9. Declaration of Margriet Denny;
- 7 10. Declaration of Mireya Espindola;
- 8 11. Declaration of Della Hallengren;
- 9 12. Declaration of Lindri Henegar;
- 10 13. Declaration of Michael Kennedy;
- 11 14. Declaration of Erika Ludwig;
- 12 15. Declaration of Vitaliy Marchenko;
- 13 16. Declaration of Gwendelyn Marshall;
- 14 17. Declaration of Lindsey Miller;
- 15 18. Declaration of Athena Osborn;
- 16 19. Declaration of Ingrid Parker;
- 17 20. Declaration of Matthew Parker;
- 18 21. Declaration of Krista Richardson;
- 19 22. Declaration of Angela Romano;
- 20 23. Declaration of Pablo Sala;
- 21 24. Declaration of Susan Sauer;
- 22 25. Declaration of Theodore Smith;
- 23 26. Declaration of Jennifer Snowden;
- 24 27. Declaration of Howard Stambor;
- 25 28. Declaration of James Touhey;
- 26 29. Declaration of Ingrid Troy;

- 1 30. Declaration of Gerald Willits;
- 2 31. Declaration of Kyoko Wright;
- 3 32. State of Washington's Motion for Summary Judgment;
- 4 33. Any Opposition or Reply briefs and supporting declarations as well as any other
- 5 papers or pleadings on file related to the State's Motion for Summary Judgment;
- 6 34. Oral Argument JAN 15th 2016; and
- 7 35. Oral Argument FEB 12th 2016; and
- 8 36. _____

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9 Having found that there exist no issues of material fact, it is therefore ORDERED that
 10 the State of Washington's Motion for Summary Judgment is GRANTED. The Court therefore
 11 DECLARES that: In part.

12 1. Defendant LA Investors, LLC d/b/a Local Records Office is a California Limited
 13 Liability Company principally located in Bellflower, California. Defendant is registered in
 14 Washington as a foreign limited liability company and conducts business in the State of
 15 Washington.

16 2. The State must prove three elements to prevail on its Consumer Protection Act
 17 (CPA) claim: (1) an unfair or deceptive act or practice; (2) occurring in trade or commerce;
 18 (3) that affects the public interest. *State v. Kaiser*, 161 Wn. App. 705, 719, 254 P.3d 850 (2001);
 19 see also *Hangman Ridge Training Stables v. Safeco Tile Ins. Co.*, 105 Wn.2d 778, 719 P.2d 531
 20 (1985). Whether a particular act is unfair or deceptive is a question of law. See *Panag v. Farmers*
 21 *Ins. Co. of Washington*, 166 Wn.2d 27, 47, 204 P.3d 885 (2009).

22 3. Defendants created and mailed 215,304 solicitations to Washington consumers.
 23 The Court finds that the Defendants' solicitation was unfair and deceptive and violated the CPA.
 24 Defendants created the deceptive net impression that Defendants' solicitation was from a
 25 governmental agency or was a bill that Washington consumers were obligated to respond to or
 26

between
 July 2012
 and July
 2015.

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1 pay. Defendants' solicitation had the capacity to deceive a substantial number of Washington
2 consumers.

3 4. Defendants were engaged in trade and commerce as they sent 215,304 deceptive
4 solicitations to Washington consumers and 7,985 Washington consumers were deceived into
5 purchasing the product *between July 2012 and July 2015.*

6 5. Defendants' acts affected the public interest. The unfair and deceptive acts were
7 committed in the course of Defendants' business, there was there a pattern or generalized course
8 of conduct, the acts were repeated, and many consumers were affected or likely to be affected.

9 6. ~~Individuals, including corporate officers, may be personally liable for conduct that
10 violates the CPA if he or she "participate[d] in" or "with knowledge approve[d] of" the practice
11 that violates the CPA. *State v. Ralph Williams' N.W. Chrysler Plymouth, Inc., 87 Wn.2d 298,*
12 *322, 553 P.2d 423 (1976).*~~

13 7. ~~The individual Defendants, Roberto Romero, a/k/a Juan Roberto Romero
14 Ascencio and Laura Romero, are found personally liable for the conduct that violates the CPA
15 described herein. Roberto Romero, a/k/a Juan Roberto Romero Ascencio and Laura Romero are
16 the sole members and managers of LA Investors, LLC and have been directly involved in
17 the day-to-day operations of the business from inception to the present. Roberto Romero,
18 a/k/a Juan Roberto Romero Ascencio and Laura Romero participated in the design and
19 approval of the deceptive mailing.~~

20 8. ~~In determining the appropriate amount for a civil penalty, the Court finds that
21 Defendants repeatedly committed the same violations of the CPA through transactions with
22 thousands of consumers in Washington. Defendants did not act in good faith. The acts and
23 practices described herein were not isolated instances of misjudgment, but rather, an intentional
24 and deliberate practice. Defendants' violations caused substantial injury to the public.~~

25 *Consumer restitution is ordered in an amount to*
26 *be determined later.*

MSW
of the
Consumer
Protection
Act.
(RCW 19.86)

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Reserved

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1 Defendants, as well as their successors, assigns, officers, agents, servants, employees,
2 representatives, and all other persons in active concert or participation with them, are
3 PERMANENTLY ENJOINED, pursuant to RCW 19.86.080(1) from:

4 1. Engaging in acts or practices that violate the CPA in the solicitation of or
5 transactions with Washington consumers;

6 2. Engaging in any other acts or practices that violate the CPA;

7 3. Failing to ensure that all their successors, assigns, officers, agents, servants,
8 employees, representatives, and all other persons in active concert or participation with them
9 receive a copy of this Order.

10 The Court ORDERS that Defendants shall jointly and severally pay:

11 An amount equal to all fees received from (and not previously refunded to) the
12 Washington consumers that responded to the Defendants' solicitation.

13 a. Defendants shall identify all fees received from (and not previously
14 refunded to) the Washington consumers that responded to the Defendants' solicitation
15 to the State and the Court on or before January __, 2016. Defendants shall also
16 provide to the State on or before January __, 2016, a list of all its past and present
17 Washington consumers, most recent contact information for those consumers, and the
18 amount of all un-refunded amounts received from each consumer, in order to facilitate
19 distribution of this restitution payment, which is ordered pursuant to RCW 19.86.080.

20 b. The State shall submit a proposed method to administer the restitution
21 payments to the Court by January __, 2016. Any objection shall be submitted by
22 January __, 2016, and any response shall be submitted by February __, 2016. The
23 Court will determine the method to administer the restitution payments without oral
24 argument unless it notifies the parties.

25 c. Defendants shall bear all costs for the administration of the restitution
26 payments.

Civil penalties in an amount to be determined later

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Reserved

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~~2. \$2,776,745 in civil penalties to the State of Washington pursuant to RCW 19.86.140. This amount is based on a penalty of \$89 for each of Defendants' 7,895 deceived paying customers (\$702,695) and a penalty of \$10 per mailing for those deceptive solicitations that did not result in a purchase (\$2,074,090).~~

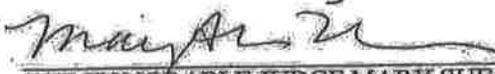
MSW

3. The State's reasonable costs and attorney's fees. The State shall submit its costs and fees to the Court by ~~January 15~~ ^{March 4th} 2016. Any objection shall be submitted by ~~January~~ ^{February 26} 2016, and any response shall be submitted by ~~February 11~~ ^{March 11} 2016. The Court will determine the award of costs and attorney's fees without oral argument unless it notifies the parties.

MSW

4. These amounts shall be paid to the State of Washington by check made payable to "Attorney General-State of Washington" and sent to the Office of the Attorney General, Attention: Cynthia Lockridge, Administrative Office Manager, 800 Fifth Avenue, Suite 2000, Seattle, Washington 98104-3188.

DATED this 12th day of February, ~~2015~~ 2016.


THE HONORABLE JUDGE MARY SUE WILSON

Presented by:
ROBERT W. FERGUSON
Attorney General

JOHN NELSON, WSBA #45724
Assistant Attorney General
Attorneys for Plaintiff State of Washington

Exhibit 2

LOCAL RECORDS OFFICE
 533 Church Street #142
 Nashville, TN 37219
 Phone: (800) 790-0721

THIS SERVICE TO OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF TITLE IS NOT ASSOCIATED WITH ANY GOVERNMENTAL AGENCY. YOU CAN OBTAIN A COPY OF YOUR DEED OR OTHER RECORD OF YOUR TITLE FROM THE COUNTY RECORDER IN THE COUNTY WHERE YOUR PROPERTY IS LOCATED.

FILE
 2017 APR 13 AM 11:57

7050216-LR TUN16561019 DIGIT+2
 Redacted for Privacy

LB DC

Please Respond By:
11/28/2016

LOCAL RECORDS OFFICE

Local Records Office provides a copy of the only document that identifies Julie Beth Smith Bartoloni as the property owner of ^{Redacted for Privacy} a recently recorded transferred title on the property.

Local Records Office provides a property profile where you can find the property address, owner's name, comparable values, and legal description or parcel identification number, property history, neighborhood demographics, public and private schools report.

Records obtained through public information show a deed was recorded in your name ^{Redacted for Privacy} on 2016-09-28 which indicates your ownership and interest in the specified property below.

HAMILTON PUBLIC INFORMATION

Legal Property Address:

Redacted for Privacy

Purchase or Transfer Date:	2016-09-28	Year Built:	1952	Property ID:	147I D 004
Doc Number:	2016092800197	Lot Sq. Ft:	N/A	Improvements:	\$0
Sale Amount	N/A	Square Feet:	2967 SF	Use Code:	1001
Assessed Value:	\$55,750	Pool:	N/A	2nd Owner Name:	^{Redacted for Privacy}

For a complete property profile and an additional copy the only document that identifies you as a property owner usually called deed, please detach coupon and return with an \$89 processing fee in the envelope provided. You will receive your documents and report within 21 business days.

Upon receipt of your processing fee, your request will be submitted for documents preparation and reviewed. If for any reason your request for deed and property profile cannot be obtained, your processing fee will be immediately refunded.

LOCAL RECORDS OFFICE IS NOT AFFILIATED WITH THE COUNTY IN WHICH YOUR DEED IS FILED IN, NOR AFFILIATED WITH ANY GOVERNMENT AGENCIES. THIS OFFER SERVES AS A SOLICITING FOR SERVICES AND NOT TO BE INTERPRETED AS BILL DUE. THIS PRODUCT OR SERVICE HAS NOT BEEN APPROVED OR ENDORSED BY ANY GOVERNMENTAL AGENCY, AND THIS OFFER IS NOT BEING MADE BY AN AGENCY OF GOVERNMENT. THIS IS NOT A BILL THIS IS A SOLICITATION YOU ARE UNDER NO OBLIGATION TO PAY THE AMOUNT STATED, UNLESS YOU ACCEPT THIS OFFER.

Please detach coupon and mail with your check



CODE: TUN16561019-2

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	CHECK NO.
147I D 004	\$ 89.00	11/28/2016	

Redacted for Privacy

MAKE CHECK PAYABLE TO:

LOCAL RECORDS.
 533 Church Street #142
 Nashville, TN 37219

Please check box if your mailing address is different and print mailing address on reverse side.

Your Phone Number: () _____
 Please write the PROPERTY ID NO. On the lower left corner of your check.

Local Records Office: In the United States anyone can have access to the records of any Real Property. The Real Property is usually recorded in the County records where Local Records Office runs powerful on-line searches to find the Deed of millions of people throughout The United States and gathers at the same time several Characteristics of the property such as: Property Characteristics, Property History, Sale Loan Amount, Assessment and Tax Information, Nearby Neighbors, Comparable Sale Date, Neighborhood Demographics, Private and Public Schools reports, Plat Map, and others. Those are sent to thousands of new property owners.

Real property is property that includes land and buildings, and anything affixed to the land. Real property only includes those structures that are affixed to the land, not those which can be removed, such as equipment.

Real Property Records are generally filed with and kept on a county level; they originate from two major governmental sources: County Recorder's or Courthouse and Property (Tax) Assessor's offices.

Property Title refers to a formal document that serves as evidence of ownership. Conveyance of the document may be required in order to transfer ownership in the property to another person. Title is distinct from possession, a right that often accompanies ownership but is not necessarily sufficient to prove it. In many cases, both possession and title may be transferred independently of each other.

Property deeds are legal instruments that are used to assign ownership of real property, to transfer title to the land and its improvements such as a house. Words used to convey property transfer may be grant, assign, convey or warrant, but they basically all do the same thing, they transfer the interest of the person selling the house to the person buying the house.

Types of property ownership:

a) **Sole Ownership:** The simplest form of property ownership, sole ownership grants one individual complete rights over the property in question.

b) **Tenancy by the Entireties:** When a married couple purchases real estate together, they are granted tenancy by the entireties by many states. This means that each party holds one-half interest in the property, but neither can dispose of or otherwise abridge the right of the other to the property.

c) **Tenancy in Common:** This form of ownership allows multiple people to own a percentage of the same property. While the percentage owned may vary, each person has an equal right to the property during their lifetime. If one of the tenants in common dies, their interest in the property passes to their heirs; it does not devolve to the other tenants in common.

d) **Joint Tenancy:** Joint tenancy agreements require that four conditions be met: ownership must be received at the same time, tenants must hold an equal interest, tenants must each be named on the title, and all must have exactly the same rights of possession. Unlike tenants in common, joint tenants have right of survivorship; the ownership of the property passes to the remaining joint tenants in the event of the death of one of the owners. One joint tenant can buy out another, or legal proceedings can be instituted to dissolve the joint tenancy. If one participant sells his or her interest in the property to another person, the joint tenancy is converted into a tenancy in common, and the right of survivorship is no longer valid; the other tenants have no recourse against this action by one or more of their number.

e) **Community Property:** In some states, real estate purchased by a married couple becomes community property. This form of ownership basically creates a condition where the real estate (and other property, if applicable) is owned by the partnership created by the marriage. If the marriage is dissolved through divorce, the value of the property must be divided between the partners. Community property ownership may give right of survivorship, essentially giving the entirety of the property to the surviving spouse in the event of death; other forms allow the partners to leave their interest in the property to their heirs after they die.

f) **Tenancy in Severalty:** Absolute and sole ownership of property by a legal entity, without cotenants, joint-tenants, or partners.

DISCLAIMER: * Local Records Office is not affiliated with any State or the United States or the County Records. Local Records Office is an analysis and retrieval firm that uses multiple resources that provide supporting values, deeds and evidence that is used to execute a property reports and deliver a requested deed.

Local Records Office is not affiliated with the county in which your deed is filed in, nor affiliated with any government agencies. This offer serves as a soliciting for services and not to be interpreted as bill due.

This Service to obtain a copy of your Deed or other record of Title is not associated with any Governmental Agency. You can obtain a Copy of your Deed or other Record of your Title from the County Recorder in the County where your property is Located. The price varies depending on each county rate. This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by agency of government. This is not a bill. This is a solicitation; you are under no obligation to pay the amount stated, unless you accept this offer.

<i>Mailing Address</i>		
<i>Address:</i>		
<i>City:</i>	<i>State:</i>	<i>Zip Code:</i>

COVAL RECORDS OFFICE

533 Church Street #142
Nashville, TN 37219

Redacted

POSTAGE
PAID
LOCAL RECORDS
OFFICE

2016

IMPORTANT PROPERTY INFORMATION
RESPOND PROMPTLY

WARNING:

\$2,000 FINE , 5 YEARS IMPRISONMENT
OR BOTH FOR ANY PERSON INTERFERING
OR OBSTRUCTING WITH DELIVERY OF
THIS LETTER U.S. MAIL T.T. 18 SEC 1702 U.S. CODE

THIS IS NOT A GOVERNMENT DOCUMENT

Personal Information Redacted for Privacy



232 CBQ-GPI 37027

PLEASE
PLACE
STAMP
HERE

From: _____

LOCAL RECORDS OFFICE
533 Church Street #142
Nashville, TN 37219

Exhibit 3

National Profile Document

5133 Harding Pike Ste. B10-281
 Nashville, TN 37205
 Phone: (800) 640-2794
 www.National-Profile.com

FILED

Respond By:
12/12/2013



2017 APR 13 AM 11:57
 NPDP-TUN57661106 - Digit: 2379

Redacted for Privacy

12

December						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

The National Profile Document's most recent information shows that Redacted for Privacy as the property owner of Redacted for Privacy by a recently recorded transferred title on the property.

National Profile Document provides a property profile where you can verify the property address, owner's name, comparable values, and legal description or parcel identification number, property history, neighborhood demographics, public and private schools report.

Records obtained through public information shows that a document was recorded in your name Redacted for Privacy on 10/10/2013 which indicates your ownership and interest in the specified property below.

DAVIDSON COUNTY PUBLIC INFORMATION

Legal Property Address:

Redacted for Privacy

TRANSFER INFORMATION		PROPERTY CHARACTERISTIC	
Property ID:	073-01-0-180-00	Year Built:	1950
Purchase or Transfer Date:	10/10/2013	Lot Size	10890 SF
Doc Number:	2013-10100106505	Square Feet:	1300 SF
Transfer Amount	N/A	Use Code:	1001
Second Owner:	Redacted for Privacy	Pool:	N/A

For a complete property profile and a free copy of the recorded document that identifies you as a property owner, please detach coupon and return with a \$88 processing fee in the envelope provided. You will receive your report and document within 21 business days.

Upon receipt of your processing fee, your request will be submitted for documents preparation and review. If for any reason your property profile request cannot be obtained, your processing fee will be immediately refunded.

THIS OFFER SERVES AS A SOLICITING FOR SERVICES AND NOT TO BE INTERPRETED AS BILL DUE. THIS PRODUCT OR SERVICE HAS NOT BEEN APPROVED OR ENDORSED BY ANY GOVERNMENTAL AGENCY, AND THIS OFFER IS NOT BEING MADE BY AN AGENCY OF GOVERNMENT. THIS IS NOT A BILL. THIS IS A SOLICITATION YOU ARE UNDER NO OBLIGATION TO PAY THE AMOUNT STATED, UNLESS YOU ACCEPT THIS OFFER.

****Please detach coupon and mail with your payment****



CODE: TUN57661106

PROPERTY ID NO.	SERVICE FEE	PLEASE RESPOND BY:	AMOUNT PAID:
073-01-0-180-00	\$ 88.00	12/12/2013	

Redacted for Privacy

Please check box if your mailing address is different and print mailing address on reverse side.

Your Phone Number: () _____
 Please write the PROPERTY ID NO. On the lower left corner of your check.

MAKE CHECK PAYABLE TO:
NATIONAL PROFILE DOCUMENT
 5133 Harding Pike Ste. B10-281
 Nashville, TN 37205

National Profile Document: In the United States anyone can have access to the records of any Real Property. The Real Property is usually recorded in the County records where National Profile Document runs powerful on-line searches to find the recorded documents of millions of people throughout the United States and gathers at the same time several characteristics of the property such as: Property Characteristics, Property History, Sale Loan Amount, Assessment and Tax Information, Nearby Neighbors, Comparable Sale Date, Neighborhood Demographics, Private and Public Schools reports, Plat Map, and others. Those are sent to thousands of new property owners.

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DISCLAIMER: * National Profile Document is not affiliated with any United States' County or State. National Profile Document is an analysis and retrieval firm that uses multiple resources that provide supporting values and evidence that is used to execute a property reports and deliver a requested document.

This offer serves as a soliciting for services and not to be interpreted as bill due. This product or service has not been approved, or endorsed by any government agency, and this offer is not being made by agency of government. This is not a bill. This is a solicitation; you are under no obligation to pay the amount stated, unless you accept this offer. National Profile Document operates in accordance to both business and professions code.

For more information visit us at: <http://www.national-profile.com>

Mailing Address		
Address:		
City:	State:	Zip Code:

NATIONAL PROFILE DOCUMENT
5133 Harding Pike Ste. B10-281
Nashville, TN 37205

MAIL

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
PBPS

IMPORTANT PROPERTY INFORMATION
RESPOND PROMPTLY

2013

WARNING:
\$2,000 FINE, 5 YEARS IMPRISONMENT
OR BOTH FOR ANY PERSON INTERFERING
OR OBSTRUCTING WITH DELIVERY OF
THIS LETTER U.S. MAIL TTT.18 SEC 1702 U.S. CODE

THIS IS NOT A GOVERNMENT DOCUMENT



69 100-1P1 37216



From: _____

PLEASE
PLACE
STAMP
HERE

NATIONAL PROFILE DOCUMENT
5133 Harding Pike Ste. B 10-281
Nashville, TN 37205