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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

AMERICAN VIDEO DUPLICATING, INC., a California corporation; TUSH LAW LTD., a California limited partnership, and KENNETH M, HAHN, a sole proprietor, DBA CAL STATE FINANCIAL, individually and on behalf of a class of similarly situated businesses and individuals,

Plaintiffs,

vs.

CITIGROUP INC., CITIBANK, N.A.; U.S. BANCORP., U.S. BANK, N.A.;

Case No.:

CLASS ACTION COMPLAINT FOR DECLARATORY RELIEF AND DAMAGES

(1) DECLARATORY RELIEF

(2) UNFAIR BUSINESS PRACTICES IN VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE § 17200, *et seq.*

JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., WELLS FARGO & CO., WELLS FARGO N.A.; BANK OF AMERICA CO., BANK OF AMERICA N.A.; MUFG BANK LTD., MUFG UNION BANK N.A.; LIVE OAK BANCSHARES INC., LIVE OAK BANKING COMPANY; PAYPAL HOLDINGS, INC.; NEWTEK BUSINESS SERVICES, INC.; HARVEST SMALL BUSINESS FINANCE; and; DOE LENDERS 1 to 4,975, inclusive,

Defendants.

(3) UNJUST ENRICHMENT

DEMAND FOR JURY TRIAL

GERAGOS & GERAGOS, APC
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Plaintiffs American Video Duplicating, INC., Tush Law, LTD., and Kenneth M. Hahn, a sole proprietor, dba Cal State Financial, bring this class action complaint on behalf of themselves and those similarly situated (hereinafter "Plaintiffs) against Defendants Citigroup, INC., Citibank N.A., U.S. Bancorp, U.S. Bank N.A., JPMorgan Chase & CO., JPMorgan Chase Bank, N.A., Wells Fargo & CO., Wells Fargo N.A.; Bank of America CO., Bank of America N.A.; MUFG Bank LTD., Union Bank of California N.A.; Live Oak Bancshares Inc., Live Oak Banking Company; PayPal Holdings, Inc; Newtek Business Services, Inc.; Harvest Small Business Finance, LLC.; and DOE LENDERS 1 to 4,975, inclusive, (hereinafter "Defendants") to stop Defendants' unlawful conduct and to obtain monies owed as a result of Defendants' conduct. For their class action complaint, Plaintiffs allege as follows based upon their personal knowledge and upon information and belief, including investigation conducted by their attorneys.

PARTIES

1. Plaintiff, American Video Duplicating, Inc. ("AVD") is a California corporation organized and authorized to do business and doing business in the State of California. Among providing other services, AVD is a consulting firm in good standing with the State of California. President, David M. Wohl ("Wohl"), has been a business consultant since 1996. In the 1980s, Wohl passed all four parts of the CPA Exam. Wohl