

<p>CITY AND COUNTY OF DENVER  DISTRICT COURT  1437 Bannock Street  Denver, CO 80202</p> <hr/> <p>STATE OF COLORADO, <i>ex rel.</i> PHILIP J. WEISER, ATTORNEY GENERAL,</p> <p>Plaintiff,</p> <p>v.</p> <p>VISUAL PROP STUDIOS, LLC, d/b/a PROPDOKS;  and ERDIS MOORE, aka ERDIS MOORE III, an individual,</p> <p>Defendants.</p>	<p style="text-align: center;"><b>^ COURT USE ONLY ^</b></p>
<p>PHILIP J. WEISER, Attorney General  ABIGAIL M. HINCHCLIFF, 47942*  First Assistant Attorney General  BIANCA E. MIYATA, 42012*  JOHN FEENEY-COYLE, 44970*  Senior Assistant Attorneys General  ANN C. JOYCE, 22142*  CONOR A. KRUGER, 54111*  Assistant Attorneys General  Ralph L. Carr Judicial Center  1300 Broadway, 7th Floor  Denver, CO 80203  Telephone: (720) 508-6651  FAX: (720) 508-6040  *Counsel of Record</p>	<p>Case No.</p> <p>Div.:</p>
<p><b>COMPLAINT</b></p>	

Plaintiff, the State of Colorado, upon relation of Philip J. Weiser, Attorney General for the State of Colorado (“the State”), alleges as follows:

**INTRODUCTION**

1. The health and safety of Coloradans and the functioning of Colorado’s marketplace depend on the assumption that documents presented in everyday transactions are what they appear to be. Employers must rely on the results of drug

tests, documentation of illness, or certifications for their employees to safely perform dangerous tasks. Lenders need to understand their borrowers' incomes. Landlords need to make sure tenants' pets on their property are vaccinated. Accident victims need accurate information about insurance. Stores need to reserve parking spots for handicapped customers. In ways both big and small, the people of this state have no choice but to rely on the truthfulness of the documents presented to them.

2. Law enforcement and judicial officers also rely on the documents and information provided by attorneys and parties to make critical decisions that affect Coloradans' families, welfare, and liberty. And courts rely on their own orders being effective and complied with, without doubt as to their veracity or legitimacy. The creation of fraudulent documents to be presented to the courts or passed off as the courts' own orders subverts the authority of the judicial system and is an assault on the rule of law.

3. Some bad actors provide false documentation to deceive courts, government agencies, businesses, and their fellow citizens.

4. These fraudulent documents can have devastating effects. For example, false titles play a critical role in the automobile theft industry, allowing criminals to profit by passing off stolen vehicles as legitimate to unknowing buyers. Law enforcement in Denver and its surrounding counties has been struggling to respond to the epidemic of car theft in Colorado, which has risen to historic levels and prompted changes to the State's criminal code.<sup>1</sup>

5. But bad actors committing fraud often do not act alone. Instead, they are aided by sophisticated individuals who create and sell realistic documents that can be passed off as authentic.

6. The Defendants here, Visual Prop Studios d/b/a PropDoks and Erdis Moore, are engaged in a far-reaching scheme to create fraudulent documents for sale. This scheme spans years and the State estimates that the Defendants have created tens of thousands of fraudulent documents that have been used to defraud Colorado's consumers, its businesses, its courts, and the government agencies charged with protecting the public.

7. Defendants' website states (sporadically and unconvincingly) that these fraudulent documents are intended for use as movie props, educational tools, or jokes. The types of documents the business offers, the volume of documents the business

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<sup>1</sup> The General Assembly recently enacted SB 23-097, which modifies the penalties for car theft, making all car thefts felonies and decoupling penalties from the value of the stolen car. This bill took effect on July 1, 2023.

creates, and the documents themselves all belie this flimsy pretense. Defendants know that their documents will be used to commit fraud; they do not care.

8. Defendants do not vet their customers or the documents they seek at all. Quite the opposite: they endeavor to create highly realistic documents and tell customers *not* to provide information about the use to which they will put these documents. In so doing, Defendants know they are providing their customers with the tools and often the guidance with which to commit fraud and willfully turning a blind eye to the inevitable results. Defendants offer their services without regard for the impact and harms they will have on institutions, the judicial system, or unsuspecting citizens by introducing a steady flow of false documents into the stream of commerce. As the Defendants tell those willing to commit fraud, “Your Imagination Is Our Limitation.”

9. The Colorado Attorney General is uniquely positioned to stop those who aid and abet fraud by creating and selling these fraudulent documents. And state law enforcement, including the Colorado Attorney General, has a duty to protect Coloradans from fraud, including financial fraud, insurance fraud, prescription drug fraud, Medicaid fraud, unemployment fraud, and identify theft.

10. The State brings this action under the Colorado Consumer Protection Act, §§ 6-1-101 through -116, C.R.S. (“CCPA”) to stop Visual Prop Studios, LLC, d/b/a PropDoks and Erdis Moore (collectively, Defendants) from engaging in unlawful and deceptive conduct and to secure all other appropriate relief.

### **PARTIES**

11. Philip J. Weiser is the duly elected Attorney General of the State of Colorado and is authorized under § 6-1-103, C.R.S. to enforce the provisions of the CCPA.

12. Defendant Visual Prop Studios, LLC is a Colorado limited liability company, formed on June 20, 2020, with its principal office located at 12025 East Montana Place, Aurora, Colorado 80012. As of July 11, 2023, Visual Prop Studios is in good standing with the Colorado Secretary of State.

13. Visual Prop Studios, LLC, does business under the name PropDoks.

14. Defendant Erdis Moore, aka Erdis Moore III, resides at 12025 East Montana Place, Aurora, Colorado 80012. Upon information and belief, Mr. Moore is the sole owner and operator of PropDoks. At all times relevant to this Complaint, acting alone or in concert with others, Mr. Moore formulated, directed, or controlled

the acts and practices of PropDoks, including the acts and practices set forth in this Complaint.

15. Defendants conduct business with customers at 970 South Oneida Street, #200, Denver, Colorado 80224 (“the storefront”).

### **JURISDICTION AND VENUE**

16. Pursuant to §§ 6-1-103 and 6-1-110(1), C.R.S., this Court has jurisdiction to enter appropriate orders prior to and following an ultimate determination of liability.

17. The violations alleged in this Complaint occurred, in part, in Denver, Colorado. Therefore, venue is proper in Denver, Colorado, pursuant to § 6-1-103, C.R.S. and Colorado Rule of Civil Procedure 98.

### **RELEVANT TIMES**

18. The conduct that gives rise to the claims for relief contained in this Complaint began at least in 2020 and has been ongoing through the present.

19. This action is timely brought pursuant to § 6-1-115, C.R.S.: it is brought within three years of the date on which the last in a series of false, misleading, deceptive acts or practices occurred, and the described acts or practices are ongoing.

### **GENERAL ALLEGATIONS**

#### **I. PropDoks advertises and sells false government, automobile, and medical documents.**

20. PropDoks maintains a website at [www.propdoks.com](http://www.propdoks.com). Customers may place orders on PropDoks’ website for pickup at the storefront. Upon information and belief, the storefront is the only location where Defendants conduct business.

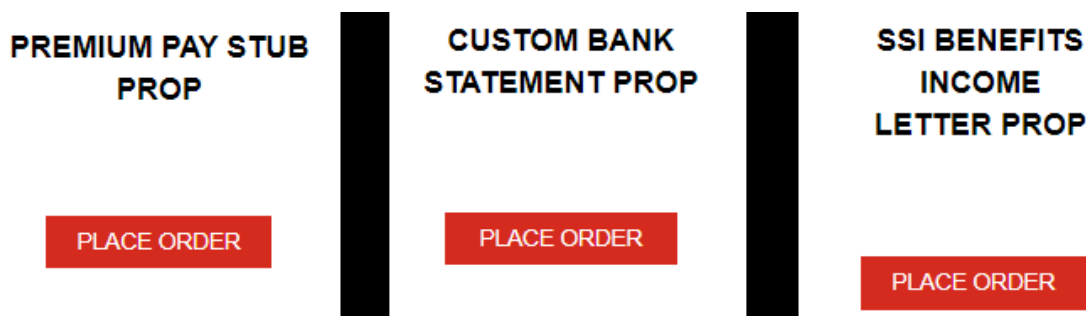
21. PropDoks has filled tens of thousands of orders over the past two years and collected hundreds of thousands of dollars from customers.

22. Defendants have updated their website over the past year, increasing the number of services and documents they offer for sale. While continuing to offer the same core set of false court, financial, and motor vehicle documents, Defendants have expanded their offerings from 40 to over 70 types of false documents.

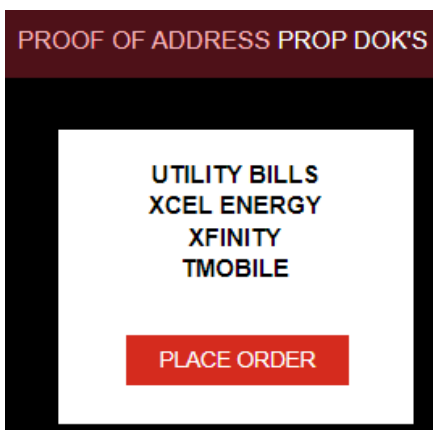
23. On this website, Defendants have recently begun to offer an “Express Prop Document Order Menu” of custom documents for sale, which is split into Financial, Proof of Address, Vehicle, Medical, and Problem Solvers categories.

24. The language by which the website describes the potential uses for the false documents—by turn, as props, educational tools, or jokes—is unconvincing in the extreme. The detailed nature of the fraudulent documents, the types of documents themselves, and the documents’ lack of disclaimers (*see infra*) all make clear they are intended for fraudulent use. And the website includes no mention of films or theatrical productions in which Defendants’ documents have been used or references to clients who use Defendants’ documents in their legitimate endeavors.

25. Defendants offer the following “Financial Prop Dok’s”:



26. These “Proof of Address Prop Dok’s” are available on the website:



27. Defendants offer these false auto-related documents under their “Vehicle Props” menu:

**COLORADO VEHICLE  
REGISTRATION PROP**

**PLACE ORDER**



**TEMP TAG PROP  
(CO, TX, IA)**

**PLACE ORDER**



**AUTO INSURANCE |  
SR22 | NEW POLICY**

**PLACE ORDER**

28. Defendants advertise “Medical Prop Dok’s” for sale:

EMERGENCY ROOM |  
URGENT CARE  
DR NOTE PROP

PLACE ORDER

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COLORADO MMJ  
CARD PROP

PLACE ORDER

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POSITIVE COVID-19  
TEST RESULTS PROP

PLACE ORDER

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EMOTIONAL SUPPORT  
ANIMAL RX PROP

PLACE ORDER

29. In a catchall category titled “Problem Solvers Dok’s,” PropDoks offers the following documents:

**BAD CREDIT / EVICTION  
PAYOFF LETTER PROP**

**PLACE ORDER**

**US MILITARY  
DEPLOYMENT PROP**

**PLACE ORDER**

**RESIDENTIAL LEASE  
PROP**

**PLACE ORDER**

30. On the current website, Defendants offer additional false documents for sale in the “In Store Idea List,” which has remained largely the same throughout previous versions of the site. The menu includes no language attempting to connect the documents offered to a prop or theatrical purpose.

31. The In Store menu lists sixty-four document types available for purchase, many of which overlap with the documents Defendants offer for sale in the “Express Prop Document Menu”:



<b>FINANCIAL</b>	<b>COURT</b>
1X PAYSTUB	COURT APPEARANCE NOTICE
1X BANK STATEMENT	CHANGE OF DEFENDANT (Felony excuse)
SSI INCOME	POLICE REPORT STOLEN ID
CHILD SUPPORT INCOME	POLICE REPORT DOMESTIC
1040 (1)	BOND RELEASE PAPER / KIT
W2 (1)	CHILD SUPPORT INCOME
1099 (1)	RESTRAINING ORDER
JOB VERIFICATION LETTER	SUBPOENA
JOB OFFER LETTER	COURT EVICTION
JOB TERMINATION LETTER	EMERGENCY PROTECTION ORDER
	COMMUNITY SERVICE
	CUSTODY PAPERS
<b>EDUCATION / SCHOOL</b>	
COLORADO G.E.D.	
HIGH SCHOOL DIPLOMA (ANY SCHOOL)	
COLLEGE DEGREE	<b>MOTOR VEHICLE</b>
CERTIFICATE OF COMPLETION DRUG CLASS	TEMP TAG
COMPLETION ANGER MANAGEMENT	OUT OF STATE TEMP (IA,GA,TX)
COMPLETION DOMESTIC VIOLENCE	AUTO INSURANCE 3 MONTH
COMPLETION FAMILY CLASS	AUTO INSURANCE 6 MONTH
	AUTO INSURANCE FULL PACKET
	SR22 INSURANCE
<b>LIFESTYLE</b>	LETTER OF AUTO COVERAGE
FLIGHT ITINERARY	PROP AUTO TITLE
STORE RECEIPT	DAMAGE ESTIMATE RECEIPT
3 DAY NOTICE OF EVICTION	AUTO REPAIR RECEIPT
RX PILL BOTTEL LABEL W/BOTTLE	NOTORIZED BILL OF SALE
RESIDENTIAL LEASE	DRIVING RECORD W/STAMP
SERVE SAFE CERTIFICATE	COMMERCIAL AUTO INS
BARBERS LICENSE	
EULOGY / FUNERAL	<b>MEDICAL</b>
ATM RECEIPTS	DR NOTE
LETTER HEAD LETTER	EMOTIONAL SUPPORT ANIMAL RX
XCEL BILL	MEDICAL REPORT
TMOBILE BILL	VOIDED RX
XFINITY BILL	MEDICAL MMJ LICENSE
RENTERS INSURANCE	COVID-19 TEST (POSITIVE ONLY)
PROP MMJ CARD	MEDICAL BILL
<b>SOLUTIONS</b>	
MILITARY DEPLOYMENT	
3 DAY NOTICE	
UTILITY BILL	
SSI INCOME	
COLORADO AUTO TITLE	
POLICE REPORT	
CHANGE OF DEFENDANT MOTION	
RESIDENTIAL LEASE	

32. In addition to its specifically listed documents for sale, Defendants offer to customize other types of documents upon request:

**100'S MORE PROP DOCUMENTS AVAILABLE IN STORE,  
OR JUST ASK AND WE CAN CREATE IT.**

33. At the bottom of the website's homepage, Defendants require that customers seeking false documents not expressly listed in their menu of service come to their storefront in person, rather than submitting a request in writing:

**IF YOU DO NOT SEE THE ORDER FORM IN THE START HERE MENU  
IT MEANS, YOU MUST COME INTO THE OFFICE TO PLACE YOUR ORDER**

34. A previous version of the website which was available, upon information and belief, for viewing from January 2022 to January 2023 explained in detail how customers could utilize its false documents to commit various types of fraud on other consumers, medical professionals, and law enforcement:

THLY \$30

**NEW Combo Dokument's & Food for Though BOX**

1. **GET OUT OF A LEASE?**..... Domestic Violence Emergency move request (Police Report of violence)
2. **FELONY ON RECORD ISSUE?**..... (Court Dokument, ruling your felony was due to Stolen ID)
3. **EVICION ON YOUR RECORD PASS?**.....(Police Report + Court Ruling that your ID was stolen)
4. **NEED EXTENDED COUNT MMJ (32OZ Per Day)** ....Med Hist. Report Diagnosed With Epilepsy
5. **AUTO TITLE VOIDED OR LOST?**...(Power of Attorney, authorizing you to obtain/transfer title instantly.
6. **EMISSIONS DELAYING YOUR TAGS?**..(Be Exempt...\$750 of repair receipts/Co Springs Res Proof.
7. **DID U KNO, OUT OF STATE TEMPS CANNOT BE RAN BY CITY OFFICERS?**..(IA, GA, TX Temps Available)
- 8 **NEED RX BOTTLE LABEL IN YOUR NAME?** (Legal Possession).....RX Label printed in your name on RX container.
9. **IN A JAM, NEED HELP PAYING YOUR RENT?**...(Eviction Notice, 3 Day Notice, could qualify U for Public Assistance)

35. The former version of the website, available upon information and belief, for viewing from January 2022 to January 2023, also offered services related to “resume verification.” While some of the positions Defendants provided verification for included general office jobs, Defendants also offered resume verification for fields in which Coloradan’s lives and safety depend on professionals’ proper training and credentials. For example, Defendants provided resume verification for nursing, a field which requires professionals to be licensed and engage in continuing professional education. *See* § 12-255-110, C.R.S. (2022).

**PROPDOK'S RESUME VERIFICATION OF EXPERIENCE SERVICE....(Apply for better Job & pay)**

**Choose from 1 of 3 of our Employers**

*(Each Employer will have Website, Dedicated Phone #, and Job verified by a Professional Voice:*

- **(Medical Field)** Dalia Pine Health Care Services
- **(Industrial Field)** Hessinger Contractor & Building Materials
- **(Executive Field)** INTRACOM TECHNOLOGIES CO.

**Choose from 50+ Job Titles that verify you have 3,5,7,10+ years experience**

- Manager
- Shift Manager
- Trainer
- Department Supervisor
- Nurse
- Heavy Equipment Operator

36. Despite these statements on their website indicating their documents could be used for fraudulent purposes or offering to provide resume verification, Defendants claim their products are made only for the purposes of “replica documents, movie scene props, educational examples, gag, theatrical enhancement[s], social media and webcasting enhancements.”

37. In much smaller font, Defendants display a disclosure and disclaimer next to the heading and description of the documents available for sale:

Disclaimer: Purchaser of any prop item ordered online, either prop document(s), or custom created document(s), shall assume all liability for any attempt or intent to fraud or any mis-use. Purchaser has not discussed usage for any PropDok items, to an employee of PropDok's. All items made by PropDok's are made for video prop, theatrical, novelty, or educational use only.

38. Through this disclaimer, which is displayed both in the storefront and website, Defendants attempt to shield themselves from the foreseeable results of their actions. But Defendants cannot post a series of magic words to remove themselves from the chain of events that begins with false documents, many of which carry significant legal implications, and ends with the commission of fraud on unsuspecting individuals.

39. This same disclaimer was portrayed prominently on the website when Defendants provided customers with suggestions on how to use the products for explicitly fraudulent, not theatrical, purposes. The disclaimer is just as unconvincing in the website's current iteration with absurd suggestions for how Defendants' highly realistic fakes can be used.

40. Defendants do not offer any products or services other than false documents, false verification services, false guns, false prescription pills, false prescription pill bottles, and surveillance equipment.

41. Defendants do not disclose the location of the storefront to the public on the PropDoks website; the location is revealed to customers only after they have placed an order and received an email confirmation.

42. Customers can only pick up PropDoks orders in-person at the storefront. Defendants do not ship PropDoks products to customers.

43. Despite collecting sums from customers on credit card purchases labelled as Denver sales tax, the City of Denver has no record of Defendants registering their business with the City or ever having remitted any sales tax to the City of Denver.

## **II. PropDoks sold false documents to an undercover investigator of the Department of Law on three occasions.**

### **A. PropDoks sold the investigator a false tax return.**

44. On March 13, 2023, under the supervision of consumer protection attorneys, Investigator Lopez initiated a purchase of a 1040 tax document for the year 2022 from the PropDoks website.

45. While purchasing the document online, Investigator Lopez was prompted by the website to input a name, street address, the last four digits of a social security number, as well as her income and total expenses. Investigator Lopez entered \$157,304 for her income and \$39,692 for expenses. The website also prompted Investigator Lopez to enter an email address and click a box to agree with the terms of use, which were identical with the advisement on the landing page described above in paragraph 38.

46. After Investigator Lopez clicked a button marked “order,” the main screen of the website appeared. The PropDoks website did not offer Investigator Lopez an option to have her order shipped or delivered.

47. On March 14, 2023, Investigator Lopez received an email from PropDoks notifying her that her order was ready to be picked up at the storefront.

48. When she arrived at the storefront, Investigator Lopez observed two women sitting on a park bench in the vicinity of the store completing forms with the words “vehicle registration and insurance” on the top.

49. Investigator Lopez approached a man working behind a cutout window in the storefront and asked to pick up her document. The man printed the document

and placed it in an envelope. When he asked for forty dollars, Investigator Lopez paid with a credit card and asked for an emailed receipt.

50. Inside the storefront, Investigator Lopez observed the following sign posted next to the cutout window:



51. As Investigator Lopez left the storefront, she observed more people come inside, including the women she had seen sitting on the park bench earlier.

52. After leaving the storefront, Investigator Lopez reviewed the false return and observed that it stated income and expenses similar, but not identical, to her entries when ordering the false return online. The standard deduction listed on the false return matched numbers from IRS tax year 2019, not 2022.

53. No language appeared on the false return stating it was a fake or a prop.

54. The receipt Investigator Lopez received by email indicated that she had paid \$40 for the false return. The receipt also showed she paid 4.81% in Denver sales tax, totaling \$1.92.

**B. PropDoks sold the investigator a false temporary license plate and insurance card.**

55. On May 30, 2023, under the supervision of consumer protection enforcement attorneys, Investigator Lopez completed a second undercover purchase from PropDoks. Instead of ordering online in advance, Investigator Lopez went to the storefront and told the woman at the front counter that she needed a temporary license plate and a corresponding insurance card showing coverage for six months.

56. The woman handed Investigator Lopez a tablet computer for her to input the data she wanted to appear on the temporary plate. Investigator Lopez was given the choice of a Colorado or Texas Temporary License Plate. Investigator Lopez chose a Colorado tag and filled in the following information: the VIN (Vehicle Identification Number), year of the vehicle, make of the vehicle, body type, vehicle color. The application also allowed Investigator Lopez the option of choosing her own temporary tag number which she declined.

57. Investigator Lopez also entered information for the car insurance on the tablet computer, including: the policy holder name, street address, insurance type, the policy start date, and the year, make, model and VIN on the vehicle. Again, Investigator Lopez agreed to the terms of use and submitted the order.

58. After a short wait, the woman handed Investigator Lopez both printed documents. In the footer of the page where the false insurance card was printed, below the dotted line where the insurance card would normally be cut out, in very small lettering appears:

Revised (01/20) Aspen & Porter Insurance Card © Prop Insurance Card DM-5054 API Group P505 For Video Prop Use Only

59. Along the dashed line in the temporary tag is the phrase “NOT FOR OFFICIAL USE FOR VIDEO PROP USE ONLY.” This language appears in lighter text and is interspersed with dashes where the tag will be cut out or placed in a tag holder on the car. When the temporary tag is placed in a tag holder on a car, the disclaimer is not visible.

60. While Investigator Lopez was filling out the application and waiting for the order, several people came in and out of the business to purchase items.

61. Investigator Lopez ran the Colorado temporary license plate number of 5226345 through a computer system at the Colorado Department of Revenue Motor Vehicle Investigation Unit to capture all data related to license plates, temporary license plates, vehicle titles, driver’s licenses, etc. The listing on the number came back to a 2012 Toyota 4Runner issued by a Corwin Toyota out of Colorado Springs. This number was issued to another car in Colorado in 2023.

62. Investigator Lopez received a receipt by email indicated that she had paid \$130 for both documents. The receipt also showed she had paid 4.81% in Denver sales tax, totaling \$6.25.

**C. PropDoks sold the investigator a false protection order and custody order.**

63. On June 20, 2023, under the supervision of consumer protection enforcement attorneys, Investigator Lopez completed a third purchase from PropDoks. Investigator Lopez went to the storefront, where she placed an order for an Emergency Protection Order and a Court Order for Allocation of Child Custody.

64. When Investigator Lopez entered the location, she asked the front desk attendant about purchasing child custody and protection order paperwork.

65. The attendant handed Investigator Lopez two pieces of paper that read “Prop Doks Custom Dokment Order Form.” The attendant filled out the section of “What type of Dokment do you need?” On the first piece of paper, she put “Restraining Order” and the second piece of paper “custody.” She also added the information of “county, parties, and dates.”

66. Investigator Lopez returned the completed paperwork to a second individual inside of the business. A couple of moments later, a third individual came from the back of the business and confirmed the names in the custody order.

67. Investigator Lopez observed that all six of the chairs in the waiting area were occupied by customers.

68. Investigator Lopez waited about one hour and forty-five minutes until the documents were ready. In this timeframe, Investigator Lopez observed several customers who came to purchase various items. Investigator Lopez heard multiple customers ask to purchase Colorado temporary license plates, doctor notes, a COVID vaccine card, a positive COVID test, paystubs, and fake money.

69. Investigator Lopez observed that most of the transactions were purchased with cash. Investigator Lopez observed that when cash was used the customer was not charged tax because several customers handed the attendant the exact cash amount for the purchase and no change was given.

70. While in the waiting area, Investigator Lopez observed a sign that stated, “We Make Proof of ANYTHING” where the phrase “dam (sic) near” is written to side, between “of” and “ANYTHING.” This phrase is followed by “Your Imagination Is Our Limitation.”


71. Prior completing the purchase, an individual reviewed a draft of the documents with Investigator Lopez. After Investigator Lopez approved of the draft,

the individual told her that all of the information would be put on different paper and stamped with the court information.

72. The individual gave Investigator Lopez a false Emergency Protection Order which contains a caption appearing to include a case number, filing date, and court stamp:

<input checked="" type="checkbox"/> County Court <input type="checkbox"/> District Court <input type="checkbox"/> Adams Juvenile <input type="checkbox"/> Adams Probate _Adams_ County, Colorado Court Address:  1100 Judicial Center Dr, Brighton, CO 80601	<b>CASE NO. 23DV30215463</b> <b>FILED 06/16/2023</b>
Petitioner: _____ v. Respondent: _____ Address: _____ _____	<b>COURT USE ONLY</b> Case Number: <b>23DV30215463</b> 16 Character #: _____ Division          Courtroom
<b>EMERGENCY PROTECTION ORDER ISSUED PURSUANT TO §13-14-103, C.R.S.</b>	

73. The false protection order also contains a signature block which appears to include a judge's signature:

Date: <u>06/16/2023</u> (time) <u>10:24am</u>	 *Judge <input type="checkbox"/> Magistrate
By signing, I acknowledge receipt of this Order.	
Date: _____	_____ Signature of Restrained Person
JDF 394 R8/13 EMERGENCY PROTECTION ORDER ISSUED PURSUANT TO §13-14-103, C.R.S. Page 2 of 3	



74. In all respects, the false protection order provided by PropDoks is consistent with the proposed order form available on the Colorado Judicial Branch website.<sup>2</sup>

75. The false protection order contains additional information directing law enforcement officers regarding enforcement of the false protection order:

**NOTICE TO LAW ENFORCEMENT OFFICERS**

- ✓ You shall use every reasonable means to enforce this Emergency Protection Order.
- ✓ You shall arrest or take into custody, or, if an arrest would be impractical under the circumstances, seek a warrant for the arrest of the Restrained Party when you have information amounting to probable cause that the Restrained Party has violated or attempted to violate any provision of this Order and that the Restrained Party has been properly served with a copy of this Order or has received actual notice of the existence and substance of this Order.
- ✓ You shall enforce this Order even if there is no record of it in the Protection Order Central Registry.
- ✓ You shall take the Restrained Party to the nearest jail or detention facility.
- ✓ You are authorized to use every reasonable effort to protect the Protected Parties to prevent further violence.
- ✓ You may transport or arrange transportation to a shelter for the Protected Parties.

76. The false protection order contains no disclaimer that it is false or a prop meant for theatrical purposes.

77. The individual also gave Investigator Lopez a false Court Order for Allocation of Child Custody which contains a caption appearing to include a case number, filing date, and court stamp:

<input checked="" type="checkbox"/> County Court <input type="checkbox"/> District Court <input type="checkbox"/> Adams Juvenile <input type="checkbox"/> Adams Probate _Adams_ County, Colorado Court Address:  <u>1100 Judicial Center Dr. Brighton, CO 80601</u>	Court Use Only  <b>CASE NO. 23CRJ33021</b> <b>FILED 06/16/2023</b>
<b>Parties:</b> Petitioner: _____ & Respondent: _____ <small>(or Co-petitioner)</small>	Case Number: 23CRJ33021  Division: 3  Courtroom: 200
<b>Court Order for Allocation of Child Custody</b>	

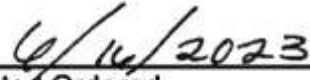
78. The order contains a signature block appearing to include the signature of a magistrate:

<sup>2</sup> Available at:

<https://www.courts.state.co.us/Forms/PDF/JDF%20394%20Emergency%20Protection%20Order%20Purusant%20to%2013-14-103.pdf>.

**It is so ordered,**

  
 Judge  Magistrate

  
Dated Ordered

79. The false custody order contains no disclaimer that it is false, or a prop meant for theatrical purposes.

### **PLAINTIFF'S CLAIMS**

80. The State incorporates the Motion for Temporary Restraining Order and Preliminary Injunction, filed simultaneously with this Complaint, and paragraphs 1-80 as if fully set forth in this section.

### **FIRST CLAIM FOR RELIEF**

**(Knowingly or recklessly engages in any unfair, unconscionable, deceptive, deliberately misleading, false, or fraudulent act or practice, § 6-1-105(1)(rrr))**

81. Plaintiff incorporates herein by reference all allegations set forth above.

82. Defendants have knowingly and recklessly violated § 6-1-105(1)(rrr) by creating and disseminating an array of false government, motor vehicle, and medical documents.

83. As evidenced by their statements on their website and the nature of the documents they are creating, Defendants know their products will be used to commit fraud.

84. Defendants use implausible disclaimers to attempt to remain willfully blind as to the specific fraudulent purposes for which the documents they create will be used.

85. Defendants' actions are and were unfair, unconscionable, deceptive, deliberately misleading, false, and fraudulent.

86. Defendants' conduct is unconscionable in part because their actions have placed the public at risk and they aid and abet others in the commission of fraud. Defendants aid and abet others in the commission of fraud by providing them with false documents of the type that are used in benefits fraud, fraud on the court, and insurance fraud. This conduct is further unconscionable because Defendants act

knowing that these documents will be used for illegitimate purposes despite their attempt to be willfully blind to the uses of their products.

87. By means of the above-described unlawful deceptive trade practices, Defendants have deceived, misled, and unlawfully acquired money from Colorado consumers.

### **SECOND CLAIM FOR RELIEF**

**(Knowingly or recklessly makes a false representation as to the source, sponsorship, approval, or certification of goods, services, or property; § 6-1-105(1)(b)).**

88. Plaintiff incorporates herein by reference all allegations set forth above.

89. Defendants have violated § 6-1-105(1)(b), by making false representations about the source or affiliation of documents that deceive the public at large, government agencies, and the courts.

90. Defendants sell and have sold documents that falsely purport to be from such sources as the Colorado Department of Motor Vehicles, the County Court of Adams County, and the Colorado Department of Public Health & Environment. Defendants sell and have sold these products despite knowing that they would be used as true copies from the sources for fraudulent purposes. Fraudsters purchase these documents from PropDoks because they claim to be from trusted institutions. PropDoks could just as easily make a false document with a fictitious name to be used in theatrical productions or film, but instead adopts the personas of real institutions in the Denver metro area to increase the value and credibility of the false document.

91. In their storefront, Defendants make the representation that “WE MAKE PROOF OF DAM NEAR ANYTHING!!!” indicating that Defendants are aware that their customers are using their documents for proof, as if the documents were from the source indicated on the document. If Defendants’ products were intended for theatrical, film, or educational use as they claim, they would instead represent that they can make replicas, models, or props for anything. Instead, they deliberately describe their false products as “proof.”

92. Further, on the current website, Defendants frame their services as “Solutions” offered to “Problem Solvers,” revealing their understanding that their products will be used by their customers as true copies of documents in order to resolve issues that require documentation.

93. Defendants’ own representations on the prior and current versions of their website reveal their knowledge of the fraudulent purposes for which their false

documents are designed and ultimately used. While Defendants also include some disclaimers on their website to allude to connections to movies and theatrical props, the connections are nothing more than a wink and a nod to their true purpose, using the documents as a true copy from the source indicated.

94. Defendants forbid customers from sharing their reasons for purchasing the documents. Defendants represent that they go to great lengths to not know why documents are being created. Defendants also include the disclaimer that “purchaser of any prop item ordered online, either prop document(s), or custom created document(s), shall assume all liability for any attempt or intent to fraud or any misuse.” The purported ignorance for why documents are being produced, the prohibition on customers sharing how they will use the documents, and the length of the disclaimer strongly suggests that Defendants are aware that their projects are not being used for the purposes advertised.

95. By means of the above-described unlawful deceptive trade practices, Defendants have created products, which, by design, are intended for, and have been used to deceive, mislead, and unlawfully acquire money from Colorado consumers.

### **THIRD CLAIM FOR RELIEF**

**(Failing to obtain all governmental licenses or permits required to perform the services or to sell the goods, food, services, or property as agreed to or contracted for with a consumer; C.R.S. § 6-1-105(1)(z)).**

96. Plaintiff incorporates herein by reference all allegations set forth above.

97. Despite collecting sums described as Denver sales tax, Defendants have neither obtained a business license from Denver County nor remitted sales tax collected on sales made in its Denver storefront to Denver County.

98. Defendants have violated C.R.S. § 6-1-105(1)(z), by failing to obtain a proper business license to operate the storefront in Denver County and failing to pay sales taxes on sales made in its Denver physical location as required under Denver Mun. Code §§ 53-54, 53-56, 53-70.

### **RELIEF REQUESTED**

WHEREFORE, Plaintiff prays for judgment against the Defendants and the following relief:

A. An order declaring Defendant’s above-described conduct to be in violation of the Colorado Consumer Protection Act, C.R.S. §§ 6-1-105(1)(rrr),(b). and (z).

B. An order permanently enjoining Defendants, their officers, directors, successors, assignees, agents, employees, and anyone in active concert or participation with any Defendant with notice of such injunctive orders, from engaging in any deceptive trade practice as defined in and proscribed by the CCPA, and as set forth in this Complaint.

C. Additional appropriate orders necessary to prevent Defendants' continued or future deceptive trade practices.

D. A judgment in an amount to be determined at trial for restitution, unjust enrichment, or other equitable relief pursuant to C.R.S § 6-1-110(1).

E. An order requiring Defendants to forfeit and pay to the General Fund of the State of Colorado civil penalties in an amount not to exceed \$20,000 per violation pursuant to C.R.S. § 6-1-112(1)(a), or \$50,000 per violation pursuant to C.R.S. § 6-1-112(1)(c).

F. An order requiring Defendants to pay the costs and expenses of this action incurred by the Attorney General, including, but not limited to, Plaintiff's attorney fees, pursuant to C.R.S. § 6-1-113(4).

G. Any such further orders as the Court may deem just and proper to effectuate the purposes of the CCPA.

Respectfully submitted this 24<sup>th</sup> day of July, 2023.

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