UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Bureau of Consumer Financial Protection and the Commonwealth of Massachusetts *ex rel.* Maura Healey, Attorney General,

Plaintiffs,

v.

Commonwealth Equity Group, LLC (d/b/a Key Credit Repair) and Nikitas Tsoukales (a/k/a Nikitas Tsoukalis),

Defendants.

Case No. 1:20-cv-10991-RWZ

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT ON ALL COUNTS OF THE AMENDED COMPLAINT AGAINST DEFENDANTS**

Plaintiffs, the Bureau of Consumer Financial Protection (Bureau) and the Commonwealth of Massachusetts *ex rel.* Maura Healey, Attorney General (the Commonwealth), respectfully move under Federal Rule of Civil Procedure 56(a) and Local Rule 56.1 of the Local Rules for the United States District Court for the District of Massachusetts, for summary judgment on all counts asserted against Defendants in Plaintiffs' Amended Complaint (ECF 26). Specifically, the Bureau moves for summary judgment on Counts I-IV on the grounds that the material facts are not in dispute and the Bureau is entitled to judgment as a matter of law. The Bureau also seeks an award of consumer redress, injunctive relief, and civil money penalties against Defendants. The Commonwealth moves for summary judgment on Counts I-IX on the grounds that the material facts are not in dispute and the Commonwealth is entitled to judgment as a matter of law and joins the Bureau in seeking an award of consumer redress.

In support of this motion, Plaintiffs submit the accompanying memorandum of law, Local Rule 56.1 Statement of the Material Facts, supporting exhibits, and a proposed order awarding relief and entering a final judgment against Defendants on all counts of the Amended Complaint.

Under Local Rule 7.1(a)(2), Plaintiffs have conferred with the Defendants in a good faith effort to resolve this dispute by agreement but have been unable to do so.

Dated: July 28, 2023 Respectfully submitted,

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