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FILED
OREGON JUDICIAL DEPT
WASHINGTON COUNTY
2023 SEP -1 A 10:07

Verified Correct Copy of Original 9/1/2023.

IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF Washington

23CV35482

Krin Vandehey

Plaintiff,

v.

Dazzling Cleaning

Defendant.

Case No.: _____

COMPLAINT

CLAIM ☒ IS ☐ NOT SUBJECT TO
MANDATORY ARBITRATION

AMOUNT PRAYED FOR: \$ 1716⁰⁰/₂₅

PLAINTIFF, proceeding *pro se*, brings this Complaint against Defendant and alleges as follows:

1.

JURISDICTION: At all times material to this Complaint:

Plaintiff is a resident of Washington Co
Defendant does business in Washington Co

Therefore, jurisdiction in Oregon and this Court is proper, per ORCP 4.

2.

On or about 28 March 2023 Dazzling Cleaning
made appointment to clean house.

COMPLAINT Page 1 of 15

23CV35482
CM
Complaint
17123731



1 Defendant sent a worker to clean. Then
2 the hidden charges showed up.
3
4
5

6 3.

7 on or about 25 April 2023 I met
8 the appointment to clean and
9 additional charges were disclosed.
10 I called & stopped service.
11
12

13 4.

14 From the above date Dazzling
15 cleaning contrives to charge me
16 for "monthly fee"
17
18
19

20 5.

21 Defendant will not allow me
22 to stop service & fees. Each month
23 they charge me. I canceled my
24 debit card to stop them &
25 had to redo all of my transfers
26
27
28

- 6 -

Even after cancelling the debit
Card they continue to charge
me. I have called repeatedly
to stop & either you can't reach
them & they won't stop charges

3-15

FIRST CLAIM FOR RELIEF

Plaintiff re-alleges and incorporates Paragraphs 1- 5 as if fully set forth here.

Defendant's actions constitute unethical behavior as described above. Defendant has caused Plaintiff damage in the amount of \$ 216⁰⁰, representing \$ 216⁰⁰ in economic damages and \$ 1500⁰⁰ in non-economic damages for pain, suffering, embarrassment, humiliation, and inconvenience. and prays for punitive damages

SECOND CLAIM FOR RELIEF

Plaintiff re-alleges and incorporates Paragraphs 1- 5 as if fully set forth here.

Defendant's actions constitute a crime as described above. Defendant has caused Plaintiff damage in the amount of \$ 216⁰⁰, representing \$ 216⁰⁰ in economic damages and \$ 1500⁰⁰ in non-economic damages for pain, suffering, embarrassment, humiliation, and inconvenience. + pray for punitive

// damages as I'm not the only
// one they have abused by unbusiness
// like practices. Dis honesty, unethical
// behavior. & Racketeering.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

-A money award judgment entered against Defendant for \$ 1716⁰⁰, representing
\$ 216⁰⁰ in economic damages and \$ 1500⁰⁰ in non-economic damages, as
described above.

-An award of post-judgment interest on any money damages awarded at a rate of 9%
simple per annum.

-Plaintiff's reasonable costs and disbursements for bringing this action.

-Any and all other relief the Court deems just and reasonable under the circumstances.

*please look at the history of
complaints for same problem
with others.*

Dated: 1 Sept 2023

[Signature]
Signature