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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

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14 Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

15  
16 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

17  
18 **FEDERAL TRADE COMMISSION,**

19 Plaintiff,

20 v.

21 **LIGHTS OF AMERICA, INC.,**  
a California Corporation;

22 **USMAN VAKIL,**  
an individual; and

23 **FAROOQ VAKIL,**  
an individual,

24 Defendants.  
25  
26  
27  
28

CV- **SACV10-01333 JVS**

**MLGx**

**COMPLAINT FOR PERMANENT  
INJUNCTIVE AND OTHER  
RELIEF**

1 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint  
2 alleges:

3 1. The FTC brings this action under Sections 5(a)(1) and 13(b) of the Federal  
4 Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a)(1) and 53(b), to  
5 obtain a permanent injunction, rescission or reformation of contracts,  
6 restitution, the refund of monies paid, disgorgement of ill-gotten monies,  
7 and other equitable relief, against Defendants Lights of America, Inc.,  
8 Usman Vakil, and Farooq Vakil (collectively “Defendants”) for engaging  
9 in deceptive acts or practices in connection with the advertising and sale of  
10 lighting products, in or affecting commerce, in violation of Section 5(a) of  
11 the FTC Act, 15 U.S.C. § 45(a).

12 **JURISDICTION AND VENUE**

13 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331,  
14 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).  
15 3. Venue is proper in this district under 28 U.S.C. § 1391(b)-(c), and 15  
16 U.S.C. § 53(b).

17 **PLAINTIFF**

18 4. The FTC is an independent agency of the United States Government  
19 created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of  
20 the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or  
21 practices in or affecting commerce.  
22 5. The FTC is authorized to initiate federal district court proceedings, by its  
23 own attorneys, to enjoin violations of the FTC Act and to secure such  
24 equitable relief as may be appropriate in each case, including rescission or  
25 reformation of contracts, restitution, the refund of monies paid, and the  
26 disgorgement of ill-gotten monies. 15 U.S.C. § 53(b).

**DEFENDANTS**

- 1  
2 6. Defendant Lights of America, Inc. (“LOA”) is a California corporation  
3 with its principal place of business at 611 Reyes Drive, Walnut, CA 91789.  
4 LOA transacts or has transacted business in this district and throughout the  
5 United States. At all times relevant to this Complaint, acting alone or in  
6 concert with others, LOA has advertised, marketed, distributed, or sold  
7 lighting products to consumers throughout the United States.
- 8 7. Defendant Usman Vakil is the President of, and has a fifty-one percent  
9 ownership interest in, LOA. At all times relevant to this Complaint, acting  
10 individually or in concert with others, he has formulated, directed,  
11 controlled, had authority to control, or participated in the acts or practices  
12 set forth in this Complaint and knew or should have known that the acts or  
13 practices described herein were unfair or deceptive. Defendant Usman  
14 Vakil transacts or has transacted business in this district and throughout the  
15 United States.
- 16 8. Defendant Farooq Vakil is the Vice President of, and has a forty-nine  
17 percent ownership interest in, LOA. At all times relevant to this  
18 Complaint, acting individually or in concert with others, he has formulated,  
19 directed, controlled, had authority to control, or participated in the acts or  
20 practices set forth in this Complaint and knew or should have known that  
21 the acts or practices described herein were unfair or deceptive. Defendant  
22 Farooq Vakil transacts or has transacted business in this district and  
23 throughout the United States.
- 24 9. At all times relevant to this Complaint, the alleged acts and practices of  
25 Defendants have been in or affecting commerce, as “commerce” is defined  
26 in Section 4 of the FTC Act, 15 U.S.C. § 44.

**DEFENDANTS' COURSE OF CONDUCT**

- 10. Since February 2008 and continuing thereafter, Defendants have advertised, promoted, offered for sale, sold and distributed Light Emitting Diode lamps ("LED lamps") to major national retailers for sale to consumers. These LED lamps are screw light bulbs that can be used in households in place of incandescent bulbs. LEDs typically produce more lumens (*i.e.*, a measure of brightness) with less wattage (*i.e.*, energy use) than traditional incandescent bulbs.
- 11. Defendants created, prepared, disseminated, or caused to be disseminated product labels, brochures, and other promotional materials, including, but not limited to, the attached Exhibits 1 to 3, containing, among other things, the following statements and depictions:
  - a. Lights of America Packaging (Exhibit 1)

REPLACES <b>40</b> WATTS	USES ONLY <b>1.5</b> WATTS
--------------------------------	----------------------------------

**Save \$112\*\***  
 In Energy Cost Per Bulb  
**90%**  
**More Efficient**  
 (Compared to incandescent  
 and halogen bulbs)  
**30,000 Hour Life**  
 (Life Rating of LED's)

"You'll never change your bulbs again."\*\*\*

*[The asterisks after "Save \$112" and "You'll never change your bulbs again" refer consumers to text appearing on the back of the package in very small print.]*

\*\*Based on the lifetime operating cost difference of a 40W bulb when compared to a 2.5W LED Bulb operated 4 hours per day 365 days per year at \$0.10 kwh over 30,000 hrs.

1 \*\*\*Statement based on the minimum # of times the led [sic] bulb  
2 needs to be changed.

3 b. Lights of America Packaging (Exhibit 2)

4 Light Output: 201 lumens  
5 Rated Life: 20,000 hours  
6 Energy Used: 3.5 Watts  
7 Color of Light: 5600K(Daylight)

8 *[Graphic: picture of a large LED light bulb equal to ten small  
9 incandescent light bulbs arranged in a pyramid.]*

10 **LASTS 10 TIMES LONGER**  
11 *[graphic described above]*  
12 than 2,000 hour incandescent bulbs

13 c. Lights of America Brochure (Exhibit 3)

14 Accent SPECIFICATIONS  
15 Bulb

16 WATTAGE: 4W  
17 INCANDESCENT CAMPARISON [sic]: 45W  
18 COLOR TEMP: 3500K  
19 BULB LIFE HOURS: 30,000  
20 HEAT FREE TECHNOLOGY

21 12. In numerous instances, Defendants' LED lamps produced significantly less  
22 light output than a typical incandescent light bulb at the wattage  
23 represented in Defendants' promotional materials. For example, although  
24 Defendants represented that one of their LED lantern lamps replaces a 40-  
25 watt incandescent light bulb, this particular LED lamp produced only 74  
26 lumens of light, while a typical 40-watt incandescent bulb produces 405  
27 lumens.

28 13. In numerous instances, Defendants' LED lamps produced significantly less  
lumens of light than Defendants represented in their promotional materials.  
For example, Defendants represented that one of their LED recessed lamps  
produces 90 lumens of light, but their own tests demonstrated that this  
LED lamp produces only 43 lumens.

1 14. In numerous instances, Defendants' LED lamps would not last the  
2 specified number of hours that Defendants represented in their promotional  
3 materials. If the lumen output decreases by more than 10% in the first  
4 1,000 hours, it will not last 30,000 hours. Defendants represented that one  
5 of their LED recessed lamps will last 30,000 hours, but, in independent  
6 testing, this particular LED lamp lost 80% of its light output after only  
7 1,000 hours.

8 **VIOLATIONS OF THE FTC ACT**

9 15. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or  
10 deceptive acts or practices in or affecting commerce. As set forth below,  
11 Defendants have engaged in unlawful practices in connection with the  
12 marketing and sale of LED lamps.

13 **FALSE OR UNSUBSTANTIATED CLAIMS**  
14 **IN VIOLATION OF SECTION 5 OF THE FTC ACT**

15 **Count I**

16 16. In numerous instances, in connection with the advertising, marketing,  
17 promotion, offering for sale, sale, or distribution of LED lamps,  
18 Defendants have represented, expressly or by implication, that the LED  
19 lamps will provide light output equivalent to particular watt incandescent  
20 light bulbs.

21 17. In numerous of these instances, the representations set forth in Paragraph  
22 16 are false or were not substantiated at the time the representations were  
23 made. Therefore, the making of the representations set forth in Paragraph  
24 16, above, constitutes a deceptive act or practice, in or affecting commerce,  
25 in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**Count II**

1  
2 18. In numerous instances, in connection with the advertising, marketing,  
3 promotion, offering for sale, sale, or distribution of LED lamps,  
4 Defendants have represented, expressly or by implication, that the LED  
5 lamps will provide a purported level of light output in lumens.

6 19. In numerous of these instances, the representations set forth in Paragraph  
7 18 are false or were not substantiated at the time the representations were  
8 made. Therefore, the making of the representations set forth in Paragraph  
9 18, above, constitutes a deceptive act or practice, in or affecting commerce,  
10 in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**Count III**

11  
12 20. In numerous instances, in connection with the advertising, marketing,  
13 promotion, offering for sale, sale, or distribution of LED lamps,  
14 Defendants have represented, expressly or by implication, that the LED  
15 lamps will last a specified number of hours.

16 21. In numerous of these instances, the representations set forth in Paragraph  
17 20 are false or were not substantiated at the time the representations were  
18 made. Therefore, the making of the representations set forth in Paragraph  
19 20, above, constitutes a deceptive act or practice, in or affecting commerce,  
20 in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**CONSUMER INJURY**

21  
22 22. Consumers throughout the United States have suffered and continue to  
23 suffer substantial consumer injury as a result of Defendants' violations of  
24 the FTC Act. In addition, Defendants have been unjustly enriched as a  
25 result of their unlawful acts or practices. Absent injunctive relief by this  
26 Court, Defendants are likely to continue to injure consumers, reap unjust  
27  
28

1 enrichment, and harm the public interest.

2 **THIS COURT'S POWER TO GRANT RELIEF**

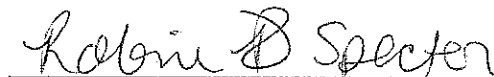
3 23. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to  
4 grant injunctive and such other relief as the Court may deem appropriate to  
5 halt and redress violations of any provision of law enforced by the FTC.  
6 The Court, in the exercise of equitable jurisdiction, may award ancillary  
7 relief, including rescission or reformation of contracts, restitution, the  
8 refund of monies paid, and the disgorgement of ill-gotten monies, to  
9 prevent and remedy any violation of any provision of law enforced by the  
10 FTC.

**PRAYER FOR RELIEF**

- 1
- 2 24. Wherefore, the FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C.
- 3 § 53(b), and the Court’s equitable powers, requests that the Court:
- 4 a. Enter a permanent injunction to prevent future violations of the FTC
- 5 Act by Defendants;
- 6 b. Award such relief as the Court finds necessary to redress injury to
- 7 consumers resulting from Defendants’ violations of the FTC Act,
- 8 including but not limited to, rescission or reformation of contracts,
- 9 restitution, the refund of monies paid, and the disgorgement of ill-
- 10 gotten monies; and
- 11 c. Award Plaintiff the costs of bringing this action, as well as such
- 12 other and additional relief as the Court may determine to be just and
- 13 proper.

14 Respectfully submitted,

15 WILLARD K. TOM  
16 General Counsel

17 

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sprocter@ftc.gov

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EXHIBIT 1

*Lights of America* OUTDOOR LANTERNS • APPLIANCE • PENDANTS **MERCURY FREE**

*Décor* **LED** *Accent*

**New Cool Technology!**

REPLACES	USES ONLY
<b>40</b>	<b>1.5</b>
WATTS	WATTS

**BRIGHT WHITE LIGHT**

**Save \$112<sup>3</sup>**  
in Energy Cost Per Bulb

**90%**  
**More Efficient**  
(Compared to incandescent and halogen bulbs)

**30,000 Hour Life**  
(Life rating of LED's)

**Heat Free Technology • Lights Up Faster**  
"You'll never change your bulbs again." \*\*\*

**E26 BASE**

MODEL No.: 2026LED-65K




OUTDOOR LANTERNS • APPLIANCE • PENDANTS

*Decor*

**LED**  
*Accent*

**ELECTRICITY COST SAVINGS:**

KILOWATT HOUR RATE	8¢	10¢	12¢	16¢
Energy Cost Savings Over 30,000 Hour Bulb Life	\$90	\$112*	\$135	\$180

\* Based on operating a 2.5W LED bulb 4 hours per day 365 days per year at 60-10 kwh.  
 \*\* Based on the lifetime operating cost difference of a 40W bulb when compared to a 2.5W LED Bulb operated 4 hours per day 365 days per year at 60-10 kwh over 30,000 hrs.  
 \*\*\* Statement based on the estimate of other the led bulb brands to be strategic.

P/N: 2026LED-65K-24



**New Cool Technology!**

ANNUAL COST TO OPERATE\*  
**\$ 0.16**



**NOTE:** This product may cause interference with radios, televisions, telephones or remote controllers. If interference occurs move this product away from device or plug into another outlet.

**CAUTION:** To reduce risk of fire, electric shock do not use where directly exposed to water. This device is not intended for use with emergency, exit fixtures or emergency exit lights. Not for use with dimmer circuits. Minimum starting tempo are 15-20°F.

**LIMITED WARRANTY:** Product will be free of defect due to workmanship for a period of (1) 2 years if product fails within the stated life expectancy, (2) 50,000 hours of use, (3) 100,000 cycles of on/off. Warranty requires and conditions of dealer approval and guarantee void if product is misused or replaced in any manner. Replacement is not available at retail store. Please return product, original package and receipt to manufacturer at: Global Vision, Walnut, CA 91790. Also contact customer Affairs.

© 2007 LIGHTS OF AMERICA, Inc.  
 Walnut, CA 91765  
 www.lightsofamerica.com  
**MADE IN CHINA** (457)

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EXHIBIT 2


**Lights of America** RECESSED • TRACK

- Mercury Free -

**BRIGHT WHITE LED LIGHT**

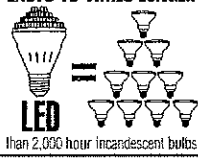
# LED Accent

Use Indoors  
Recessed Lighting



Light Output: 201 lumens  
Rated Life: 20,000 hours  
Energy Used: 3.5 Watts  
Color of Light: 5600K (Daylight)

**LASTS 10 TIMES LONGER**



**LED**  
than 2,000 hour incandescent bulbs

Assembled in USA

MODEL No.: 2004LEDDL

**Lights of America** RECESSED • TRACK

- Mercury Free -

**BRIGHT WHITE LED LIGHT**

Color Temperature  
2700K 3500K 5000K 6500K

Efficacy / Lumens Per Watt: 61  
CRI (Color Rendering Index): 77

ANNUAL OPERATING COST CHART:				
KILOWATT HOUR RATE	8¢	10¢	12¢	16¢
Annual Operating Cost	\$ .31	<b>\$ .38</b>	\$ .46	\$ .61

Based on operating a 5.5W LED bulb 3 hours per day - 200 hours per year at \$2.10/kwh.


**NOTE:** This product may cause interference with radios, televisions, telephones or remote controllers. If interference occurs, move this product away from device or plug into another outlet.

**CAUTION:** Risk of electric shock. Use only in locations where this device is not intended to be used. Do not use in fixtures or emergency exit lights. Not recommended for use with dimmers, photocells and motion control devices. Minimum operating temperature is -20°F.

**THREE YEAR LIMITED WARRANTY**

Lights of America (LOA) warrants that this product will be free from defect in material and workmanship for a period of three (3) years from the date of purchase and agrees to replace or must be purchased from an LOA authorized retailer or seller. The limited warranty is contingent upon normal, intended, and proper use, installation, transportation, and storage of the product in reasonable conditions, without alteration or modification. Defective products under warranty should be returned with the original proof of purchase and prepaid postage to: Lights of America, Inc., Attn: Consumer Affairs, Dept. 611, Hayes Drive, Walnut, CA 91789. Original proof(s) of purchase required. THIS LIMITED WARRANTY IS IN LIEU OF ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING IMPLIED WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE, MERCHANTABILITY, OR OTHER SIMILAR STANDARD, TO THE EXTENT ALLOWED BY LAW. LOA IS NOT RESPONSIBLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES ASSOCIATED WITH A WARRANTY CLAIM. For complete terms and conditions of LOA's Limited Warranty, please visit [www.lightsofamerica.com](http://www.lightsofamerica.com).

© 2009 LIGHTS OF AMERICA, Inc  
Walnut, CA 91789  
[www.lightsofamerica.com](http://www.lightsofamerica.com)  
P/N: 2004LEDDL-35K-8



7 55277 20040 9 (369)

Assembled in USA

LED Lamp  
EUS

2004: 9/16/09

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EXHIBIT 3

**MERCURY FREE**

**LED LIGHT BULBS**

**Accent Bulb**

SPECIFICATIONS

- WATTAGE: 4W
- INCANDESCENT COMPARISON: 45W
- COLOR TEMP: 3500K
- BULB LIFE HOURS: 30,000
- HEAT FREE TECHNOLOGY

ITEM DESCRIPTION

LED ACCENT DOWNLIGHT BULB

MODEL#

2004LEDDL 35K-8

UPC

755277 200409

12 OF 5

10755277200406

PCS/INNER

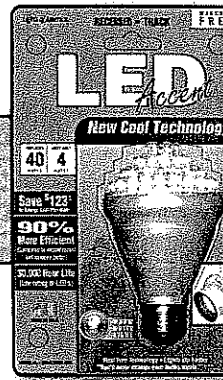
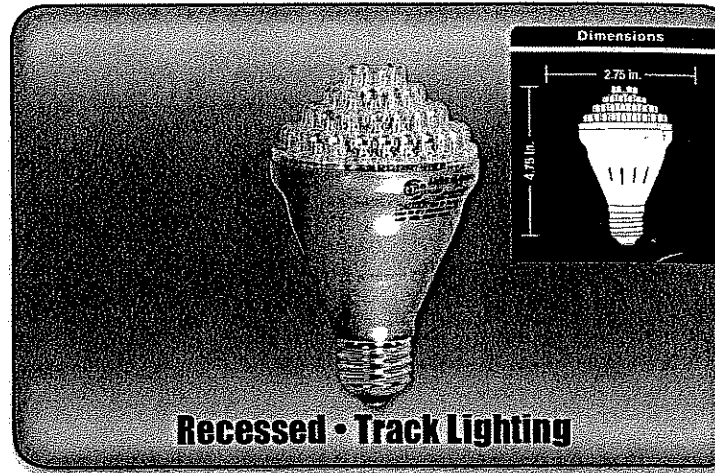
3

# OF INNERS

8

PCS/MASTER

24



**Check Register Bulb**

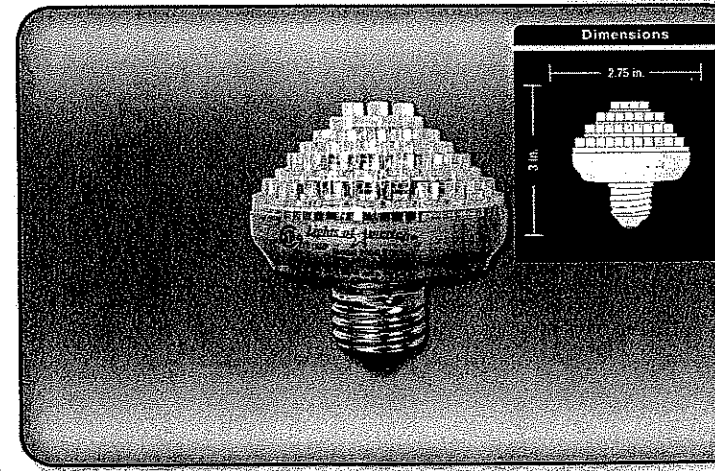
SPECIFICATIONS

- WATTAGE: 4W
- INCANDESCENT COMPARISON: 40W
- COLOR TEMP: 6500K
- BULB LIFE HOURS: 30,000
- HEAT FREE TECHNOLOGY

ITEM DESCRIPTION

LED CHECK REGISTER BULB

- MODEL# 2004LEDGR-65K-12



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

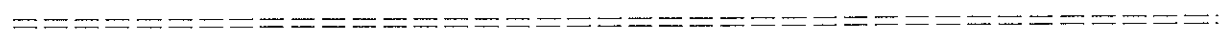
This case has been assigned to District Judge James V. Selna and the assigned discovery Magistrate Judge is Marc Goldman.

The case number on all documents filed with the Court should read as follows:

**SACV10- 1333 JVS (MLGx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge



**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

**Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

**Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

**Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> Federal Trade Commission	<b>DEFENDANTS</b> Lights of America, Inc., a California Corporation; Usman Vakil, an individual; and Farooq Vakil, an individual
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  Robin Rosen Spector, Gregory J. Madden, Stacy Procter 600 Pennsylvania Ave., N.W., M-8102B Washington, DC 20580 (telephone: 202 326-3740/2426)	<b>Attorneys (If Known)</b>  Atul Kumar 3141 Michelson Drive, Unit 401 Irvine, CA 92612 Attorney for Lights of America, Inc., Usman Vakil, and Farooq Vakil

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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**IV. ORIGIN** (Place an X in one box only.)

1 Original Proceeding   
  2 Removed from State Court   
  3 Remanded from Appellate Court   
  4 Reinstated or Reopened   
  5 Transferred from another district (specify):   
  6 Multi-District Litigation   
  7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT:** JURY DEMAND:  Yes  No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION under F.R.C.P. 23:**  Yes  No                     
  MONEY DEMANDED IN COMPLAINT:  Permanent Injunction

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

15 U.S.C. 45(a) & 53(b) - Unfair or deceptive acts or practices affecting commerce

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL PROPERTY</b>	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 530 General Habeas Corpus	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<b>BANKRUPTCY</b>	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<b>FORFEITURE/PENALTY</b>	<b>PROPERTY RIGHTS</b>
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 630 Liquor Laws	<b>SOCIAL SECURITY</b>
<input checked="" type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 861 HIA (1395ff) (405g)
<input type="checkbox"/> 891 Agricultural Act	<b>REAL PROPERTY</b>	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 862 Black Lung (923) (405g)
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 210 Land Condemnation	<b>IMMIGRATION</b>	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 660 Occupational Safety /Health	<input type="checkbox"/> 863 DIWC/DIWW (405g)
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee			<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 465 Other Immigration Actions			<b>FEDERAL TAX SUITS</b>
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 245 Tort Product Liability				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 290 All Other Real Property				<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

SACV10-01333

**FOR OFFICE USE ONLY:** Case Number: \_\_\_\_\_

**AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.**

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed?  No  Yes

If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case?  No  Yes

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply)  A. Arise from the same or closely related transactions, happenings, or events; or  
 B. Call for determination of the same or substantially related or similar questions of law and fact; or  
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.

Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.

Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Lights of America, Inc. - Los Angeles County Usman Vakil - Los Angeles County Farooq Vakil - Orange County	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.

**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Nationwide (including Los Angeles County)	Nationwide

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): Robin B Specter Date 9/3/10

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))