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CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

FILED

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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 CV 09-01947

R AJW

14 SECURITIES AND EXCHANGE
COMMISSION,

Case No.

15 Plaintiff,

COMPLAINT FOR VIOLATIONS OF
THE FEDERAL SECURITIES LAWS

16 vs.

17 INNOVA ENERGY LLC, INNOVA
LEASING AND MANAGEMENT LLC,
18 and CLEMENT EJEDAWA a/k/a
CLEMENT CHAD,

19 Defendants.

22 Plaintiff Securities and Exchange Commission ("Commission") alleges as
23 follows:

24 **JURISDICTION AND VENUE**

25 1. This Court has jurisdiction over this action pursuant to Sections 20(b),
26 20(d)(1) and 22(a) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C.
27 §§ 77t(b), 77t(d)(1) & 77v(a), and Sections 21(d)(1), 21(d)(3)(A), 21(e) and 27 of
28 the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §§ 78u(d)(1),

1 78u(d)(3)(A), 78u(e) & 78aa. Defendants have, directly or indirectly, made use of
2 the means or instrumentalities of interstate commerce, of the mails, or of the
3 facilities of a national securities exchange in connection with the transactions, acts,
4 practices and courses of business alleged in this Complaint.

5 2. Venue is proper in this district pursuant to Section 22(a) of the
6 Securities Act, 15 U.S.C. § 77v(a), and Section 27 of the Exchange Act, 15 U.S.C.
7 § 78aa, because certain of the transactions, acts, practices and courses of conduct
8 constituting violations of the federal securities laws occurred within this district,
9 and all of the defendants reside and/or are located in this district.

10 SUMMARY

11 3. This matter involves the ongoing fraudulent offer and sale of more
12 than \$1.3 million of securities by defendant Clement Ejedawe a/k/a Clement Chad
13 (“Ejedawe”) through two entities that he controls: Innova Energy LLC and Innova
14 Leasing and Management LLC, both Nevada limited liability corporations
15 (together, “Innova” and, collectively with Ejedawe, “Defendants”).

16 4. From at least September 2007 through December 2008, the
17 Defendants have raised at least \$1,381,000 from at least 31 investors in an ongoing
18 oil and gas investment fraud. Ejedawe, Innova, and other sales representatives
19 solicit investors by cold-calling them from a boiler room in Los Angeles,
20 California. The Defendants represent to investors that their money will be invested
21 in various oil and gas ventures and that they will receive monthly payments of
22 \$4,000 to \$5,000 for each \$50,000 invested.

23 5. Contrary to their representations to investors, the Defendants are not
24 using investor funds for oil and gas ventures. Instead, they are using investor
25 funds to pay undisclosed commissions to sales representatives, to pay for
26 Ejedawe’s personal expenses such as rent, automobiles, church donations, court
27 fees for a relative, and purchases at retail stores, and to make small payments to
28 complaining investors. In addition to misrepresenting the use of investor funds,

1 the Defendants are misrepresenting the returns earned by investors and the status
2 of Innova's oil and gas operations.

3 6. The Defendants also misrepresent the existence and nature of state
4 regulatory actions involving Ejedawe. Ejedawe is the subject of at least seven
5 separate state cease-and-desist or desist-and-refrain orders relating to his
6 unregistered offerings of securities, including orders from California, Alabama,
7 Pennsylvania, Maryland, Kansas, and Washington. None of these state orders are
8 disclosed in Innova's offering materials provided to investors.

9 7. Ejedawe was the principal of another company, Rosewood Energy,
10 which conducted another oil and gas offering. Several states, including Maryland
11 and Kansas, issued orders against Rosewood and Ejedawe in connection with that
12 offering. On October 9, 2007, Ejedawe's attorney represented to Commission staff
13 that Rosewood had been out of business since December 2006. Ejedawe's attorney
14 claimed that "as a result of the [state] cease and desist orders and attorneys' fees
15 associated with dealing with them, Mr. Ejedawe shut down the business and moved
16 on to other businesses unrelated to anything that could be deemed a security."

17 8. Despite the state actions and assurances from his attorney, Ejedawe,
18 through Innova, is still actively soliciting investors. The Defendants continue to
19 operate and update Innova's website, encouraging potential investors to invest in
20 Innova. Moreover, Ejedawe and Innova are lulling investors into believing their
21 investment is viable. For example, on October 13, 2008, an Innova sales
22 representative falsely informed one investor that (1) Innova was waiting for
23 permits to start drilling; and (2) Innova would start drilling around November
24 2008. In the first week of March 2009, Ejedawe told this same investor that
25 drilling would begin in April 2009.

26 9. The Defendants, by engaging in the conduct described in this
27 Complaint, have violated, and unless enjoined will continue to violate, the
28 antifraud and securities registration provisions of the federal securities laws. By

1 this complaint, the Commission seeks emergency relief against the Defendants,
2 including a temporary restraining order, an asset freeze, accountings, an order
3 expediting discovery, and an order prohibiting the destruction of documents, as
4 well as preliminary and permanent injunctions, disgorgement with prejudgment
5 interest, and civil penalties.

6 **DEFENDANTS**

7 10. Innova Energy LLC was incorporated in Nevada on May 8, 2008.
8 Clement Ejedawe is listed as its managing member. Innova is not registered with
9 the Commission in any capacity. Since 2008, Innova Energy has been operating
10 out of a leased office in Los Angeles, California.

11 11. Innova Leasing and Management LLC was incorporated in Nevada on
12 December 20, 2006. Clement Ejedawe is listed as its Manager. Innova Leasing is
13 not registered with the Commission in any capacity. Innova Leasing's website
14 indicates that its corporate headquarters are in Houston, Texas, but it has actually
15 been operating out of a leased office in Los Angeles, California.

16 12. Clement Ejedawe, a/k/a Clement Chad, age 51, is believed to be a
17 Nigerian national. For the last several years he has been residing in Westchester,
18 California, where he has been operating Innova and other oil and gas ventures.
19 Ejedawe is the managing director of Innova. Ejedawe has never been registered
20 with any broker-dealers or investment advisers.

21 **THE FRAUDULENT OFFERING**

22 **A. Overview And Structure Of The Investment Program**

23 13. Ejedawe began offering Innova securities out of a boiler room in Los
24 Angeles, California in approximately December 2006. Initially, Ejedawe
25 incorporated Innova in Nevada and opened two accounts with Wells Fargo Bank in
26 Innova's name, into which Innova deposited investor funds. Ejedawe and Innova's
27 sales agents tell investors that they are purchasing interests in either an entity
28 called Bluff Creek Prospect or an entity known as the Innova Leasing Joint

1 Venture. The Bluff Creek Prospect investors are sold purported working interests
2 in oil and gas leases. The Innova Leasing Joint Venture investors are sold interests
3 in oil and gas drilling equipment. All investor funds for both entities are pooled
4 into Innova's Wells Fargo bank accounts.

5 14. The Defendants promise investors a return between \$4,000 and \$5,000
6 per month on an investment of \$50,000. Ejedawe provides investors with a private
7 placement memorandum and glossy sales brochures. The only individual identified in
8 the materials is Ejedawe, who touts his purported "twenty-five years in the drilling
9 industry" experience in both the offering materials and in conversations with
10 investors. None of the offering materials that are provided to prospective investors
11 include financial statements. The offerings are not registered with the Commission in
12 any capacity.

13 15. The Bluff Creek sales materials have included two unsigned letters
14 dated June 15, 2006 and July 16, 2006 from a petroleum engineer. The first letter,
15 addressed to an Innova representative, purported to analyze the number of "Proven
16 Un-developed (PUD) oil and gas well locations remaining to be drilled" on
17 Innova's properties in Texas. The letter identified 121 well locations with reserves
18 from "12,000 to 30,000 barrels per well." The second letter estimated valuation of
19 Innova's wells at about \$30 million assuming a \$70 per barrel price of oil. In fact,
20 Innova does not actually own or lease any oil or gas wells or properties in Texas.

21 16. Innova and Ejedawe offer and sell the Innova investments through
22 general solicitation efforts such as cold calling from lead lists and their internet
23 website, www.innovaleasing.com.

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B. The Defendants Are Misappropriating Investor Funds And Making Material Misrepresentations Regarding Investments In Innova

1. The Defendants Are Misusing Investor Funds For Ejedawe's Personal Expenses and For Substantial Commissions To Innova Sales Representatives

17. In the offerings and in communications with investors, the Defendants market Innova as an established oil and gas drilling venture. The Defendants promise to invest investor funds in either oil and gas leases or drilling equipment. Contrary to their representations to investors, Innova has not purchased or invested in any oil and gas leases and has made only one purchase of drilling equipment, a used drilling rig purchased on December 30, 2007 for \$355,000. Ejedawe, using the name Clement Chad, purchased the rig. Ejedawe made an elaborate videotape of the rig, which is available for viewing on Innova's web site.

18. Innova disclosed to investors in a private placement memorandum that Innova Energy LLC would receive a management fee of 1.4285% of funds raised. Contrary to this disclosure, however, the Defendants have used more than one-third of investor funds to pay personal expenses of Ejedawe.

19. Ejedawe has misappropriated much of the investor funds. From September 2007 through December 2008, the Defendants raised at least \$1,381,000 from investors. During the same period, Ejedawe used investor funds to pay his personal expenses totaling more than \$600,000, including cash withdrawals totaling more than \$350,000, personal expenses including his apartment rent, credit card payments, car payments, and charitable donations, including donations to his church. Ejedawe also used Innova investor funds to pay \$11,500 to Rosewood Energy, the now-defunct offering that was the subject of cease-and-desist orders from several states and of which Ejedawe was a principal.

20. The Defendants also fail to disclose to investors that Innova sales representatives are paid commissions of up to 20%. Innova, through Ejedawe,

1 entered into an independent consultant agreement with certain sales
2 representatives. The agreement states that the sales representatives will receive a
3 commission of 20% as long as the representative raises more than \$100,000 from
4 Innova investors during the calendar month. The Defendants do not disclose the
5 sales commissions to Innova investors. Rather, they tell Innova investors that only
6 2.3809% of funds raised are used to pay "syndication costs," which they define as
7 "costs including sales commissions and other selected expenses" that are incurred
8 in connection with the offering. From September 2007 through December 2008
9 the Defendants paid over \$420,600 to Innova's sales representatives.

10 **2. The Defendants Misrepresent Investor Returns**

11 21. In sales materials prepared in April 2008, Innova promised monthly
12 income for Bluff Creek investors of approximately \$4,500 per month on a \$50,000
13 investment. In July or August 2007, an investor in Innova Leasing Joint Venture
14 was told by an Innova sales representative that he would receive approximately
15 \$4,500 per month from a \$50,000 investment. Except for a few small payments to
16 complaining investors, investors have not received the promised returns.

17 **3. The Defendants Misrepresent The Status Of Innova's**
18 **Operations**

19 22. Ejedawe, Innova and the sales agents falsely represent in both the
20 private placement memoranda and in oral communications with investors that
21 Innova has applied for and secured the necessary permits to begin drilling for oil.
22 Permits for the proposed well sites identified in Innova's private placement
23 memoranda have never been acquired by Innova Energy LLC or Innova Leasing
24 and Management LLC.

25 23. On December 14, 2007, the Defendants sent a memorandum to
26 investors claiming that the Pennsylvania Department of Transportation had
27 inspected Innova's drilling rig and granted Innova approval to operate the rig in the
28 State of Pennsylvania. This representation was false.

1 **4. The Defendants Misrepresent The Existence And Nature Of**
2 **State Regulatory Actions Involving Ejedawe**

3 24. None of the offering materials inform investors that Ejedawe is the
4 subject of cease-and-desist orders relating to unregistered offerings of securities from
5 California, Alabama, Maryland, Kansas, Pennsylvania, Illinois, and Washington.

6 25. In spite of their knowledge of the state orders, Ejedawe and Innova
7 continue to offer and sell Innova's securities. In fact, they misrepresent to investors
8 the nature of the state actions. For example, Ejedawe sent an email to an investor
9 on August 19, 2008 advising him that the Alabama order was the result of a
10 complaint from a "non-investor" about "persistent calls to his residence by our
11 sales people." In a telephone conversation on October 13, 2008, an Innova sales
12 representative advised another investor that the California order was based on a
13 complaint from a "disgruntled old man." In fact, both the California and Alabama
14 orders resulted from a cold call that Innova sales representatives unknowingly
15 made to an Alabama Securities Commission investigator.

16 **FIRST CLAIM FOR RELIEF**

17 **Unregistered Offer And Sale Of Securities**

18 **Violations of Sections 5(a) and 5(c) of the Securities Act**

19 **(Against All Defendants)**

20 26. The Commission realleges and incorporates by reference paragraphs 1
21 through 25 above.

22 27. The Defendants, and each of them, by engaging in the conduct
23 described above, directly or indirectly, made use of means or instrumentalities of
24 transportation or communication in interstate commerce or of the mails, to offer to
25 sell or to sell securities, or to carry or cause such securities to be carried through
26 the mails or in interstate commerce for the purpose of sale or delivery after sale.

27 28. No registration statement has been filed with the Commission or has
28 been in effect with respect to the offering alleged herein.

1 29. By engaging in the conduct described above, the Defendants violated,
2 and unless restrained and enjoined will continue to violate, Sections 5(a) and 5(c)
3 of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c).

4 **SECOND CLAIM FOR RELIEF**

5 **Fraud In The Offer Or Sale Of Securities**

6 **Violations of Section 17(a) of the Securities Act**

7 **(Against All Defendants)**

8 30. The Commission realleges and incorporates by reference paragraphs 1
9 through 25 above.

10 31. The Defendants, and each of them, by engaging in the conduct
11 described above, in the offer or sale of securities by the use of means or
12 instruments of transportation or communication in interstate commerce or by use
13 of the mails directly or indirectly:

- 14 a. with scienter, employed devices, schemes, or artifices to
15 defraud;
- 16 b. obtained money or property by means of untrue statements of a
17 material fact or by omitting to state a material fact necessary in
18 order to make the statements made, in light of the
19 circumstances under which they were made, not misleading; or
- 20 c. engaged in transactions, practices, or courses of business which
21 operated or would operate as a fraud or deceit upon the
22 purchaser.

23 32. By engaging in the conduct described above, the Defendants violated,
24 and unless restrained and enjoined will continue to violate, Section 17(a) of the
25 Securities Act, 15 U.S.C. § 77q(a).

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THIRD CLAIM FOR RELIEF

**Fraud In Connection With The Purchase Or Sale Of Securities
Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder
(Against All Defendants)**

33. The Commission realleges and incorporates by reference paragraphs 1 through 25 above.

34. The Defendants, and each of them, by engaging in the conduct described above, directly or indirectly, in connection with the purchase or sale of a security, by the use of means or instrumentalities of interstate commerce, of the mails, or of the facilities of a national securities exchange, with scienter:

- a. employed devices, schemes, or artifices to defraud;
- b. made untrue statements of a material fact or omitted to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- c. engaged in acts, practices, or courses of business which operated or would operate as a fraud or deceit upon other persons.

35. By engaging in the conduct described above, the Defendants violated, and unless restrained and enjoined will continue to violate, Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5.

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that the Court:

I.

Issue findings of fact and conclusions of law that the defendants committed the alleged violations.

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II.

Issue judgments, in forms consistent with Fed. R. Civ. P. 65(d), temporarily, preliminarily and permanently enjoining the defendants and their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with any of them, who receive actual notice of the judgment by personal service or otherwise, and each of them, from violating Sections 5(a), 5(c) and 17(a) of the Securities Act, 15 U.S.C. §§ 77e(a), 77e(c) and 77q(a), and Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5.

III.

Issue, in a form consistent with Fed. R. Civ. P. 65, a temporary restraining order and a preliminary injunction freezing the assets of each of the defendants, prohibiting each of the defendants from destroying documents, granting expedited discovery, and requiring accountings from each of the defendants.

IV.

Order each defendant to disgorge all ill-gotten gains from their illegal conduct, together with prejudgment interest thereon.

V.

Order each defendant to pay civil penalties under Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3).

VI.

Retain jurisdiction of this action in accordance with the principles of equity and the Federal Rules of Civil Procedure in order to implement and carry out the terms of all orders and decrees that may be entered, or to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

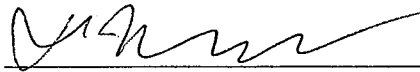
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VII.

Grant such other and further relief as this Court may determine to be just and necessary.

DATED: March 23, 2009



David J. Van Havermaat
Attorney for Plaintiff
Securities and Exchange Commission

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

SECURITIES AND EXCHANGE COMMISSION

CASE NUMBER

PLAINTIFF(S)

L. CV09-01947

v.

INNOVA ENERGY LLC, INNOVA LEASING
AND MANAGEMENT LLC, and CLEMENT
EJEDAWE a/k/a CLEMENT CHAD

DEFENDANT(S).

SUMMONS

TO: DEFENDANT(S): Innova Energy LLC, Innova Leasing and Management LLC,
and Clement Ejedawe a/k/a Clement Chad

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, David J. Van Havermaat, whose address is SEC/LARO, 5670 Wilshire Boulevard, 11th Floor, Los Angeles, California 90036. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

LA'REE HORNDated: MAR 23 2009

By: _____



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[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

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

I (a) PLAINTIFFS (Check box if you are representing yourself ☐) SECURITIES AND EXCHANGE COMMISSION	DEFENDANTS INNOVA ENERGY LLC, INNOVA LEASING AND MANAGEMENT LLC, and CLEMENT EJEDAWA a/k/a CLEMENT CHAD Los Angeles County
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) David J. Van Havermaat (323) 965-3998 Securities and Exchange Commission 5670 Wilshire Boulevard, 11th Floor, Los Angeles, CA 90036	Attorneys (If Known)

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

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: \$ _____

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.)

The Complaint alleges violations of the federal securities laws. 15 U.S.C. §§ 77e(a) & 77e(c); 15 U.S.C. § 77q(a); 15 U.S.C. § 78j(b) & 17 C.F.R. § 240.10b-5.

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

OTHER STATUTES ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce/ICC Rates/etc. ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 490 Cable/Sat TV ☐ 810 Selective Service ☒ 850 Securities/Commodities/Exchange ☐ 875 Customer Challenge 12 USC 3410 ☐ 890 Other Statutory Actions ☐ 891 Agricultural Act ☐ 892 Economic Stabilization Act ☐ 893 Environmental Matters ☐ 894 Energy Allocation Act ☐ 895 Freedom of Info. Act ☐ 900 Appeal of Fee Determination Under Equal Access to Justice ☐ 950 Constitutionality of State Statutes	CONTRACT ☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loan (Excl. Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	TORTS PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Fed. Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury-Med Malpractice ☐ 365 Personal Injury-Product Liability ☐ 368 Asbestos Personal Injury Product Liability IMMIGRATION ☐ 462 Naturalization Application ☐ 463 Habeas Corpus-Alien Detainee ☐ 465 Other Immigration Actions	TORTS PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability BANKRUPTCY ☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 CIVIL RIGHTS ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 444 Welfare ☐ 445 American with Disabilities - Employment ☐ 446 American with Disabilities - Other ☐ 440 Other Civil Rights	PRISONER PETITIONS ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty ☐ 540 Mandamus/Other ☐ 550 Civil Rights ☐ 555 Prison Condition FORFEITURE / PENALTY ☐ 610 Agriculture ☐ 620 Other Food & Drug ☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 630 Liquor Laws ☐ 640 R.R. & Truck ☐ 650 Airline Regs ☐ 660 Occupational Safety /Health ☐ 690 Other	LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 730 Labor/Mgmt. Reporting & Disclosure Act ☐ 740 Railway Labor Act ☐ 790 Other Labor Litigation ☐ 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: **CV09-01947**

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
Innova Energy LLC - Los Angeles County; Innova Leasing and Management LLC - Los Angeles County; and Clement Ejedawe a/k/a Clement Chad - Los Angeles 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
Los Angeles County	

* 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):



Date

3/19/09

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))

**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 Manuel Real and the assigned discovery Magistrate Judge is Andrew J. Wistrich.

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

CV09 - 1947 R (AJWx)

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.

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

===== :
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.