

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,)
)
 Plaintiff,)
)
 v.)
)
 CHRISTOPHER GABRIEL WEBB)
 D/B/A Energy Capital Group, LLC)
 D/B/A Energy Capital Corporation)
 D/B/A Defense Enterprises, LLC)
 D/B/A E2 Trust)
 D/B/A E2 Ventures, LLC)
 D/B/A Engineering Laboratories)
 D/B/A CISO)
)
 Defendant.)

Case No. 3AN-19-_____ CI

**COMPLAINT FOR INJUNCTIVE RELIEF,
CIVIL PENALTIES, AND RESTITUTION**

(AS 45.50.501)

The State of Alaska, through the Office of the Attorney General, for its
complaint alleges:

JURISDICTION AND VENUE

1. The State of Alaska, through the Office of the Attorney General, brings
this complaint under the Unfair Trade Practices and Consumer Protection Act,
AS 45.50.471 et seq., based on Defendant’s acts or practices in offering and selling
retail services under various corporate and LLC identities. Under AS 45.50.501, the
Attorney General has cause to believe that Defendant has engaged in, and is currently
engaging in, acts or practices unlawful under the Act, and brings this action in the

public interest. This court has jurisdiction over all aspects of the complaint under AS 45.50.501.

2. Venue in this action is proper in the Third Judicial District at Anchorage, under Rule 3 of the Alaska Rules of Civil Procedure.

DEFENDANT

3. Defendant conducts business in Alaska under several corporate and LLC identities, including but not limited to Energy Capital Group, LLC, Energy Capital Corporation, Defense Enterprises, LLC, E2 Trust, E2 Ventures, LLC, Engineering Laboratories and CISO. He purports to offer services including marijuana testing and marijuana concentrate manufacturing, although his businesses are yet to be licensed by the Alaska Marijuana Control Board. He lists physical addresses for his businesses in Soldotna and Kenai, Alaska. Defendant is a resident of Alisa Viejo, California.

4. At all times relevant to this complaint, Defendant has actively engaged in the offering of services in Alaska and such business activities constitute the conduct of trade or commerce within the meaning of AS 45.50.471.

FACTUAL ALLEGATIONS

5. Defendant has utilized the online registration portal maintained by the State of Alaska's Division of Corporations, Business and Professional Licensing (CBPL), to register ownership interests in several businesses. Defendant layered these businesses by listing ownership of some businesses as a combination of other businesses. Defendant Chris Webb is an individual person listed as having an ownership

interest in the below listed businesses. Alaska businesses established by the Defendant are as follows:

- a. Defense Enterprises, LLC (AK#115976), which is owned by
 1. 51% by E2VE LLC (Wyoming 2015-000696564)
 2. 15% by Energy Capital Group LLC (AK#10031824)
 3. 34% by Chris Webb

- b. Energy Capital Corporation (AK #10085560), owned 100% by E2 trust (AK#10084775)

- c. E2 Trust (AK#10084775) is a non-profit corporation and thus has no members. Its officers of record are
 1. Defense Enterprises LLC (AK#115976)
 2. E2 Ventures LTD (AK# 10084226)
 3. Energy Capital Group (AK#10031824)
 4. Engineering Laboratories (AK# 10084669)
 5. CG Webb (an individual)

- d. Energy Capital Group, LLC (AK#10031824), owned 100% by Defense Enterprises LLC (AK#115976)

- e. E2 Ventures LTD (AK#10084226) is a non-profit corporation and thus has no members. Its officers of record are
 1. Defense Enterprises LLC (AK#115976)
 2. Energy Capital Group (AK#10031824)
 3. TRI Alaska LLC (AK# 10024459, which is 100% owned by Heidi Hatch)

- f. Engineering Laboratories (AK#10084669), which is owned by
 1. 18.75% by Defense Enterprises LLC (AK#115976)
 2. 37.5% by E2 Ventures LTD (AK# 10084226)
 3. 15% by Energy Capital Group LLC (AK#10031824)
 4. 28.75% by Energy Capital Engineering Laboratories LLC – this entity is not on record with the division
 5. E2VE LLC (director only) – this entity is not on record with the division
 6. Benjamin Web (director only)
 7. Christopher Webb (director only)

- g. CISO (AK#10085585) which lists only one official
 - 1. E2 Ventures LTD (AK# 10084226) is listed as director

6. On June 4, 2018, Defendant entered the CBPL online portal and filed a biennial report for Cannabex, LLC (AK#10036903). In the report, Defendant removed Robert Blaisch as a 50% member and Richard Wall as a 50% member from their entity's record. Defendant replaced those members with Energy Capital Corporation as the sole 100% member of Cannabex, Inc. In filing the biennial report, Defendant falsely swore that he had authorization of the original entity to make these changes. Payment for the report was made by Christopher Webb.

7. On June 5, 2018, Defendant entered the CBPL online portal and filed a biennial report for Flying High Investments, LLC (AK#10036482). In the report, Defendant removed James Fejes, Jr. from the entity record as the sole member and manager. Defendant replaced Mr. Fejes with Energy Capital Group, LLC as the sole manager and Energy Capital Corporation as the sole member of Flying High Investments, LLC. In filing the biennial report, Defendant falsely swore that he had authorization from the original entity to make these changes. Payment for the report was made by Christopher Webb.

8. On June 16, 2018, Defendant entered the CBPL online portal and filed an initial report for ICS Engineering, LLC (AK#10053847). In the report, Defendant removed Abram Wilson Ortega as the organizer from the entity record. Defendant replaced Mr. Ortega with Energy Capital Corporation as the sole 100% member of ICS Engineering, LLC. In filing the initial report, Defendant falsely swore that he had

authorization of the original entity to make these changes. Payment for the report was made by Christopher Webb.

9. On June 18, 2018, Defendant entered the CBPL online portal and filed a biennial report for Green Life Supply, LLC (AK#10040751). In the report, Defendant removed Nathan Davis (80% member), Dayton Maccallum (10% member) and Jameson Johnson (10% member) from the entity record. Defendant replaced those members with E2 Ventures, Ltd. as the sole 100% member of Green Life Supply, LLC. In filing the biennial report, Defendant falsely swore that he had authorization of the original entity to make these changes. Payment for the report was made by Christopher Webb.

10. On June 21, 2018, Defendant entered the CBPL online portal and filed an initial report for Lexah Holdings, LLC (AK#10084775). In the report, Defendant removed Thomas Millar and Michael Novelli as the Organizers in the entity report. Defendant added E2 Trust as the sole 100% member of Lexah Holdings, LLC. In filing the initial report, Defendant falsely swore that he had authorization of the original entity to make these changes. Payment for the report was made by Christopher Webb.

11. On June 23, 2018, Defendant entered the CBPL online portal and filed an initial report for Alaska Oil Company, LLC (AK#10059743). In the report, Defendant removed Eric Hektner as the Organizer in the entity report. Defendant added Energy Capital Group, LLC as the “sole 99% member” of Alaska Oil Company, LLC. In filing the initial report, Defendant falsely swore that he had authorization of the original entity to make these changes. Payment for the report was made by Christopher Webb.

12. On June 23, 2018, Defendant, Christopher Webb, entered the CBPL online portal and filed an initial report for Advantage Growth Capital, Inc (AK#10053536). In the report, Defendant removed Michael Bullock as the Incorporator in the entity report. Defendant added Defense Enterprises, LLC as the sole shareholder and official of Advantage Growth Capital, Inc. In filing the initial report, Defendant falsely swore that he had authorization of the original entity to make these changes. Payment for the report was made by Christopher Webb.

13. On July 20, 2018, Defendant Christopher Webb initiated an application with the Alaska Alcohol and Marijuana Control Board (AMCO) listing the applicant as Cannabex, LLC. The application was for a Marijuana Concentrate Manufacturing Facility License, number 18727. Defendant utilized AMCO's online application system to initiate this application. In the application, Defendant named Energy Capital Corporation as the Licensee, Engineering Laboratories, Inc and Chris Webb as the Entity Officials, and Energy Capital Corporation and Heidi Hatch as Affiliates. On July 25, 2018, Defendant emailed AMCO and requested to void this application.

14. On July 20, 2018, Defendant Christopher Webb initiated an application with the Alaska Alcohol and Marijuana Control Board (AMCO) listing the applicant as Energy Capital Engineering Laboratories. The application is for a Marijuana Concentrate Manufacturing Facility License, number 18728. Defendant utilized AMCO's online application system to initiate this application. In the application, Defendant named Engineering Laboratories, Inc. as the Licensee, Cody Knicely as the

Entity Official, and Cannabex, LLC as the Affiliate. This application remains pending with AMCO.

15. On July 20, 2018, Defendant Christopher Webb initiated an application with the Alaska Alcohol and Marijuana Control Board (AMCO) listing the applicant as Energy Capital Group. The application is for a Marijuana Testing Facility License, number 18044. Defendant utilized AMCO's online application system to initiate this application. In the application, Defendant named Energy Capital Group LLC as the Licensee, TRI Alaska, LLC, Heidi Hatch, Energy Capital Corporation, and Engineering Laboratories, Inc. as the Entity Officials, and TRI Alaska, LLC and Cannabex, LLC as the Affiliates. This application remains pending with AMCO.

COUNT I

16. Paragraphs 1 through 15 are incorporated by reference.

17. Defendant engaged in unfair or deceptive acts or practices and an unfair method of competition by committing multiple acts of business identity theft. More specifically, Defendant is causing a likelihood of confusion or misunderstanding as to the source, sponsorship, or approval, or another person's affiliation, connection, or association with certification of goods or services. By assuming the business identities of business entities created by others without authorization, Defendant has created confusion surrounding ownership of these entities. Moreover, Defendant has created layers of multiple identities within his own business entities designed to confuse the public and regulators regarding ownership of his businesses, and then used these layers to assume the identity of legitimate businesses. These acts constitute multiple violations

of one or more provisions of Alaska's Unfair Trade Practices and Consumer Protection Act, AS 45.50.471 et seq., including AS 45.50.471(a) and 45.50.471(b)(3).

COUNT II

18. Paragraphs 1 through 17 are incorporated by reference.

19. Defendant engaged in unfair or deceptive acts or practices and an unfair method of competition in connection in his applications for multiple marijuana licenses. More specifically, Defendant falsely represented that the Cannabex, LLC identity belonged to himself and his multiple and layered business identities by appropriating that business in connection with his marijuana license applications.

20. Defendant falsely represented that TRI Alaska, LLC and Heidi Hatch were authorized entities applying for marijuana licenses as affiliates. Each of these acts by the Defendant constitutes a violation of one or more provisions of Alaska's Unfair Trade Practices and Consumer Protection Act AS 45.50.471 et seq., including AS 45.50.471(a) and 45.50.471(b)(3).

DEMAND FOR JUDGMENT

WHEREFORE, the State of Alaska asks this court to enter judgment against the Defendant as follows:

21. Pursuant to AS 45.50.50, enjoining Defendant, and all who act under, by or through Defendant, from continuing to engage in the unlawful conduct alleged in this complaint;

22. Ordering Defendant, pursuant to AS 45.50.501(b), to restore to any person, any money or property which may have been acquired through the unlawful

conduct alleged in this complaint, and which has not yet been restored to such person(s);

23. Pursuant to AS 45.50.551(b), awarding civil penalties of \$25,000 against Defendant for each violation of AS 45.50.471;

24. Awarding full reasonable costs and attorney fees to the State of Alaska under AS 45.50.537(d); and

25. Granting such additional relief as the court may deem proper.

DATED this ____ day of January, 2019, at Anchorage, Alaska.

KEVIN G. CLARKSON
ATTORNEY GENERAL

By: _____
Cynthia A. Franklin
Assistant Attorney General
Alaska Bar No. 0710057