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Superior Court of California  
County of Los Angeles

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Sherri R. Carter, Executive Officer/Clerk of Court  
By: Tanya Herrera, Deputy

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*Attorneys for the People of the State of California*

Pursuant to Govt. Code §6103  
**Exempt From Fees**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

**THE PEOPLE OF THE STATE OF CALIFORNIA,**

Plaintiff,

v.

**AWESOMECALLS, INC.;**  
**AWESOMECALLSTRADING, INC.;**  
**ANTHONY J. HAWORTH; AND DOES 1 - 100, INCLUSIVE,**

Defendants.

Case No **21STCV04430**

**COMPLAINT FOR INJUNCTIVE RELIEF, CIVIL PENALTIES, AND OTHER ANCILLARY RELIEF FOR VIOLATION OF THE CORPORATE SECURITIES LAW OF 1968**

(Cal. Corp. Code § 25230)

Verified Answer Required Pursuant to Code of Civil Procedure § 446

*Exempt from Filing Fees  
Pursuant to Gov. Code § 6103*



1 #608, Beverly Hills, CA 90212. Defendant AC is not a law corporation. Along with the other  
2 Defendants, AC operated the websites [www.awesomecallstrading.com](http://www.awesomecallstrading.com), [www.awesomecalls.com](http://www.awesomecalls.com),  
3 and a private online audio-visual chat room. At all relevant times, AC transacted business  
4 throughout California and the United States, including Los Angeles County.

5 6. Defendant AwesomeCallsTrading, Inc. (“ACT”) is a dissolved California  
6 corporation which, at all relevant times, had its principal place of business at 9461 Charleville  
7 Blvd Suite #608, Beverly Hills, CA 90212. Defendant ACT is not a law corporation. Along  
8 with the other Defendants, ACT operated the websites [www.awesomecallstrading.com](http://www.awesomecallstrading.com),  
9 [www.awesomecalls.com](http://www.awesomecalls.com), and a private online audio-visual chat room. At all relevant times, ACT  
10 transacted business throughout California and the United States, including Los Angeles County.

11 7. Defendant Anthony J. Haworth (“Haworth”), an individual, is a principal and alter  
12 ego of AC and ACT. According to the most recent Statement of Information filed with the  
13 Secretary of State on June 15, 2020, Haworth was the Chief Executive Officer, Chief Financial  
14 Officer, Shareholder, and Director of AC. According to the most recent Statement of Information  
15 filed with the Secretary of State on August 13, 2018, Haworth was the Chief Executive Officer,  
16 Secretary, Chief Financial Officer, Director, Shareholder, and Agent for Service of Process for  
17 ACT. Along with the other Defendants, Haworth operated the websites  
18 [www.awesomecallstrading.com](http://www.awesomecallstrading.com), [www.awesomecalls.com](http://www.awesomecalls.com), and a private online audio-visual chat  
19 room. At all relevant times, Haworth has transacted business throughout California and the  
20 United States, including in Los Angeles County. Haworth has conducted the business of  
21 AwesomeCallsTrading both at 9461 Charleville Blvd Suite #608, Beverly Hills, CA 90212, and  
22 from his residence in Los Angeles County.

23 8. On December 8, 2020, after receiving investigative subpoenas issued on behalf of  
24 Plaintiff, Haworth filed with the Secretary of State certificates of dissolution of both AC and  
25 ACT.

26 9. The true names and capacities, whether individual, corporate, or otherwise, of  
27 Defendants sued herein under the fictitious names of DOES 1 through 100, inclusive, are  
28

1 unknown to Plaintiff who therefore sues these Defendants by using fictitious names. Plaintiff will  
2 amend this Complaint to show the true names of each when the name has been ascertained.

3 10. The Defendants identified in Paragraphs 5 through 9 above are referred to  
4 collectively in this Complaint as the “Defendants” or “AwesomeCallsTrading.”

5 11. At all times mentioned herein, each of the Defendants acted as the principal, agent,  
6 or representative of each of the other Defendants, and in doing the acts herein alleged, each  
7 Defendant was acting within the course and scope of the agency relationship with each of the  
8 other Defendants, and with the permission and ratification of each of the other Defendants.

9 12. Defendants have operated as a common enterprise when engaging in the acts and  
10 practices alleged below, the purpose of which is and was to engage in the violations of law  
11 alleged in this Complaint. The common enterprise continues to the present. Haworth formulated,  
12 directed, controlled, had the authority to control, and/or participated in the acts and practices of  
13 AC and ACT, both before, during, and after those corporations’ dissolution.

#### 14 **JURISDICTION AND VENUE**

15 13. This Court has jurisdiction to hear the claims alleged in this Complaint and is a  
16 court of competent jurisdiction to grant the relief requested.

17 14. At all relevant times alleged in this Complaint, Defendants maintained an office  
18 and/or did business in the County of Los Angeles.

19 15. Violations of law alleged in this Complaint occurred in the County of Los Angeles  
20 and elsewhere throughout California and the United States.

#### 21 **FACTUAL ALLEGATIONS**

22 16. From approximately 2014 until December 8, 2020, Defendants operated a business  
23 called AwesomeCallsTrading, which sells online subscription memberships related to stock  
24 trading to consumers in California and throughout the United States. From December 8, 2020 to  
25 present, Haworth has continued to operate this business following his dissolution of AC and  
26 ACT.

27 17. Defendants have marketed and sold daily, monthly, and annual subscription  
28 memberships to AwesomeCallsTrading through their websites, [www.awesomecalls.com](http://www.awesomecalls.com) and

1 [www.awesomecallstrading.com](http://www.awesomecallstrading.com). Defendants have advertised the supposed benefits of these  
2 memberships on their websites as well as social media platforms such as Twitter.

3 18. Defendants claim to have sold approximately \$30,000 - \$35,000 per month in  
4 subscription memberships to AwesomeCallsTrading. Subscription packages range in length and  
5 cost from \$25 (for a one-day pass) to \$4,997 (for a two-year "ultimate access" subscription).

6 19. According to Defendants' website, consumers who purchase a membership will  
7 learn how to "Turn The [Stock] Market Into Your Personal Money Machine" and "achieve  
8 consistent profits," among other claims. Defendants purport to employ a team of "proven and  
9 tested traders" who moderate a "live chat" service that is available only to individuals who have  
10 purchased a subscription membership. At least three of these moderators received compensation  
11 from Defendants for these services. On information and belief, Haworth received the majority of  
12 income generated by AwesomeCallsTrading as its founder and as the sole owner of AC and ACT.

13 20. The key features of the memberships marketed and sold by Defendants are as  
14 follows. First, Defendants share a list of stock trades each morning in a members-only chat room  
15 before the stock market opens.<sup>1</sup> These recommendations are timed to the daily movements and  
16 fluctuations of the stock market, instructing subscribers to buy or sell stock in specific publicly-  
17 traded companies if the price reaches certain benchmarks during the trading day. Defendants  
18 have published advertisements claiming these stock picks are consistently profitable investments  
19 with a more than 90% success rate.

20 21. Second, throughout the trading day, Defendants advise members in a "live chat"  
21 when and how to trade the aforementioned recommended stocks based on the actual movements  
22 of the market.

23 22. Third, Defendants provide personalized answers to questions posed by live chat  
24 members during the trading day regarding the advisability of specific stock transactions, in  
25 addition to answering more general questions about trading strategies and the stock market.

26  
27 <sup>1</sup> Although Defendants also publish these lists on their website, such publication occurs after  
28 trading opens at 6:30 AM Pacific Time daily, and after the tips' utility has expired. The benefit is reserved for subscription members, who receive the tips prior to market open.

1           23.     Fourth, Defendants broadcast their personal stock trades and encourage members,  
2 both via advertisements and during the live chat, to mimic those transactions as a profitable  
3 trading strategy. In doing so, Defendants take personal stakes in the stocks shortly before they  
4 recommend the trade to subscribers.

5           24.     In general, Defendants advertise that anyone can profitably trade stocks by  
6 following their trade recommendations and proprietary strategies. By selling these memberships,  
7 Defendants operate a for-profit online business that advertises and sells personalized investment  
8 advice and stock trade recommendations that supposedly will generate consistent investment  
9 returns for subscribers. Defendants' website states that membership packages include daily lists  
10 of stock trade recommendations, "high probability" trade alerts, and "guided" trades.  
11 Personalized investment advice and trade recommendations are the Defendants' business.

12           25.     Defendants' social media advertisements reinforce that the primary business of  
13 AwesomeCallsTrading is selling stock trade recommendations. Haworth has touted the supposed  
14 benefits of membership via his public Twitter account, @AJTrader7, as for example:

- 15           • "I work hours before the open finding you the right [trade] set-ups so  
16           you can make MONEY"
- 17           • "Here is a stock that ANY of you could have traded today if you were  
18           in [AwesomeCalls] Chat ... The notes were VERY clear"
- 19           • "Look closely at these Pre-Market Game Plan Notes today Traders ...  
20           Look how specific I called the Market today ... How theses (sic) stocks  
21           would react at the open. All Entries, Exits and what I was looking for  
22           ... Everything specific on when to get in and what to look for."
- 23           • "THIS WAS BEAUTIFUL PLAY TODAY ... TOLD EVERYONE IN  
24           PRE-MARKET BUY [ticker symbol SDGR] AT \$70 ADD ON DIP  
25           EXPECT THE STOCK TO HIT \$75"
- 26           • "THE EASIEST TRADE TO EXECUTE IN [AwesomeCalls] CHAT  
27           TODAY [was ticker symbol JMIA] ALL YOU HAD TO DO WAS  
28           READ THE NOTES AN[D] THE ENTRY POINT I PICKED OUT"

1           26. Defendants do not practice, and lack specialized accreditation or licensure to  
2 practice, professions including attorney at law, accountant, engineer, or teacher.

3           27. Separate from selling the aforementioned subscription memberships, Defendants  
4 have also sold individualized training sessions and video recordings. The prices charged for these  
5 products are different from the prices charged for the above-referenced subscription memberships  
6 to Defendants' live chat room.

7           28. Defendants' website and marketing materials do not substantiate Defendants'  
8 claims that live chat subscription purchasers can profit by following Defendants' trade  
9 recommendations and individualized advice. The website features a handful of positive reviews  
10 and anecdotes about profitable trades from purported subscribers identified by their first name or  
11 social media handle. Despite claiming that "[e]very day we receive hundreds of reviews from  
12 members and followers," Defendants' website does not publish any meaningful analysis or  
13 statistics about the average returns that AwesomeCalls subscribers have earned in the stock  
14 market. And although Defendants tout subscribers' ability to watch and mimic the trades of  
15 Defendants' live chat moderators, Defendants' website does not disclose whether the moderators  
16 consistently beat returns available on passive index investments (such as the S&P 500) or whether  
17 they earn money at all by trading stocks (as opposed to selling memberships).

18           29. Contrary to the bold claims on Defendants' home page and social media about  
19 how the live chat service will guide customers to profitable securities trades, the fine print on the  
20 "terms of service" section of Defendants' website provides a starkly different message:  
21 boilerplate warnings that customers should not buy or sell any securities based on the advice  
22 provided by AwesomeCallsTrading and should rely instead on customers' independent research.  
23 Defendants buried these contradictory disclaimers in a link at the bottom of their website  
24 homepage and did not require any customers or prospective customers to read the terms of service  
25 before purchasing investment advice memberships. In any event, disclaimers do not immunize  
26 the sale of unlicensed investment advice.

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4. Pursuant to Code of Civil Procedure section 1021.8(a), that the People recover their costs of investigation and suit, including expert fees, attorney's fees, and costs; and

5. Such further or additional relief as the Court deems proper.

Dated: February 3, 2021

Respectfully Submitted,

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