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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

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

Defendants.

Case No. 21STCV04430

FIRST AMENDED COMPLAINT FOR INJUNCTIVE RELIEF, CIVIL PENALTIES, AND OTHER ANCILLARY RELIEF

(Cal. Corp. Code §§ 25230, 25235; Cal. Bus. & Prof. Code § 17200 *et seq.* and 17500 *et seq.*)

Verified Answer Required Pursuant to Code of Civil Procedure § 446

Exempt from Filing Fees Pursuant to Gov. Code § 6103

1 The People of the State of California, by and through Rob Bonta, Attorney General of the
2 State of California, based on information and belief, allege the following:

3 INTRODUCTION

4 1. As set forth herein, Defendants AwesomeCalls, Inc., AwesomeCallsTrading, Inc.,
5 AwesomeCalls LLC, and their principal, Anthony J. Haworth (collectively d/b/a
6 “AwesomeCallsTrading”) have continuously violated Corporations Code section 25230(a) since
7 approximately 2014 by selling investment advice in this state without applying for and securing a
8 valid certificate to do so. Defendants have also violated Corporations Code section 25235(a) and
9 California’s Unfair Competition and False Advertising Laws, Business and Professions Code
10 sections 17200 *et seq.* and 17500 *et seq.*, by falsely portraying Haworth as a successful stock
11 trader and by falsely representing that Haworth has the ability to help customers earn money by
12 trading stocks. In truth, Haworth has *lost* large amounts of money trading stocks *every year* since
13 2016. Defendants deceived their customers into paying millions of dollars for purported
14 strategies and trade recommendations that Defendants knew were unlikely to help customers
15 “achieve consistent profits” or “turn the [stock] market into your personal money machine,”
16 among other false claims.

17 2. Via their websites www.awesomecallstrading.com and www.awesomecalls.com,
18 Defendants sell an online membership program that purports to deliver “consistent profits” to
19 customers who purchase a subscription and follow the recommended stock trades, personalized
20 advice, and proprietary strategies offered daily by Haworth and other “proven traders” salaried by
21 AwesomeCallsTrading. The key features of online memberships marketed and sold by
22 Defendants are access to a daily list of Haworth’s recommended stock trades; access to a private
23 chat room where Haworth (and occasionally other “moderators”) dispense real-time advice on
24 how to execute the recommended trades and respond to questions from members about proposed
25 securities trades; and the ability to watch and mimic securities trades executed by Haworth.

26 3. Defendants have received several million dollars by selling these unregistered
27 investment advice packages to customers, and in doing so, have deprived them of the protections
28 afforded investors under state and federal law such as prohibitions on conflicts of interest,

1 suitability determinations for investment recommendations, periodic reporting, professional
2 examination requirements, reasonable fee limits, and other safeguards governing investment
3 advice.

4 4. Defendants have also made false or misleading claims about the value of a
5 subscription to AwesomeCallsTrading. Despite advertising that he can help customers “achieve
6 consistent profits” and touting himself as “the most talented day trader in the world” with a
7 “clairvoyant” ability to “predict the movement of the stock before the market even opens,”
8 Haworth has omitted material facts including that he has been a perennial loser at trading stocks
9 since at least 2016, including a staggering loss of more than \$14 million in 2020. Haworth does
10 not possess any cogent securities trading strategy that the average person can implement—let
11 alone any strategy capable of achieving consistent income, as he has falsely claimed to his clients
12 and prospective clients.

13 5. The Attorney General brings this civil enforcement action to enjoin Defendants’
14 ongoing violation of California law, impose penalties, and recover the unlawful proceeds of
15 Defendants’ unlawful enterprise.

16 **THE PARTIES**

17 6. Defendant AwesomeCalls, Inc. (“AC”) is a dissolved California corporation
18 which, at all relevant times, had its principal place of business at 9461 Charleville Blvd Suite
19 #608, Beverly Hills, CA 90212. Defendant AC is not a law corporation. Along with the other
20 Defendants, AC operated the websites www.awesomecallstrading.com, www.awesomecalls.com,
21 and a private online audio-visual chat room. At all relevant times, AC transacted business
22 throughout California and the United States, including Los Angeles County.

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

1 8. Defendant AwesomeCalls LLC (“ACL”) is a limited liability company
2 incorporated in Puerto Rico which, at all relevant times, has maintained a mailing address at 9461
3 Charleville Blvd Suite #608, Beverly Hills, CA 90212 and has maintained its principal place of
4 business at the Los Angeles, California residence of Defendant Anthony J. Haworth. ACL is not
5 a law corporation. Along with the other Defendants, ACL operated the websites
6 www.awesomecallstrading.com, www.awesomecalls.com, and a private online audio-visual chat
7 room. At all relevant times, ACL transacted business throughout California and the United
8 States, including Los Angeles County.

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

23 10. In October 2020, the California Attorney General’s Office served investigative
24 subpoenas to Haworth relating to AwesomeCallsTrading. In December 2020, the Attorney
25 General’s Office notified Haworth that AwesomeCallsTrading appeared to be selling investment
26 advice without a valid certificate in violation of Corporations Code section 25230 and potentially
27 other laws. Soon afterwards, on December 8, 2020, Haworth filed with the California Secretary
28 of State certificates of dissolution of both AC and ACT. That same month, without notifying the

1 California Attorney General’s Office, Haworth formed a new company, ACL, in the territory of
2 Puerto Rico. As of this filing, www.awesomecallstrading.com and www.awesomecalls.com
3 purport to be owned and operated by ACL, while as of December 2020 these websites stated that
4 they were owned and operated by AC and ACT. In truth and substance, these entities and
5 websites are all owned and controlled by Haworth.

6 11. The true names and capacities, whether individual, corporate, or otherwise, of
7 Defendants sued herein under the fictitious names of DOES 1 through 100, inclusive, are
8 unknown to Plaintiff who therefore sues these Defendants by using fictitious names. Plaintiff will
9 amend this Complaint to show the true names of each when the name has been ascertained.

10 12. The Defendants identified in Paragraphs 6 through 9 above are referred to
11 collectively in this Complaint as the “Defendants” or “AwesomeCallsTrading.”

12 13. At all times mentioned herein, each of the Defendants acted as the principal, agent,
13 or representative of each of the other Defendants, and in doing the acts herein alleged, each
14 Defendant was acting within the course and scope of the agency relationship with each of the
15 other Defendants, and with the permission and ratification of each of the other Defendants.
16 Haworth shares a unity of interest and ownership with the corporate Defendants and, throughout
17 the relevant period, has unilaterally controlled these entities such that their separate personalities
18 no longer exist. Given that Haworth dissolved AC and ACT in response to the Attorney
19 General’s investigation and given that he attempted to form ACL in another jurisdiction to
20 continue the unlawful enterprise alleged in this Complaint, separating the acts of the Defendants
21 would sanction a fraud, promote injustice, or cause an inequitable result.

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

1 **JURISDICTION AND VENUE**

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

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

6 17. Violations of law alleged in this Complaint occurred in the County of Los Angeles
7 and elsewhere throughout California and the United States.

8 **FACTUAL ALLEGATIONS**

9 18. Since at least 2014, Defendants have operated a business called
10 AwesomeCallsTrading, which sells online subscription memberships related to stock trading to
11 consumers in California and throughout the United States.

12 19. Defendants have marketed and sold daily, monthly, and annual subscription
13 memberships to AwesomeCallsTrading through their websites, www.awesomecalls.com and
14 www.awesomecallstrading.com. Defendants have advertised the supposed benefits of these
15 memberships on their websites as well as online media platforms such as YouTube and Twitter.

16 20. Defendants have accepted more than \$3 million in payments from consumers for
17 subscription memberships to AwesomeCallsTrading. Subscription packages range in length and
18 cost from \$25 (for a one-day pass) to \$4,997 (for a two-year “ultimate access” subscription).
19 Defendants have also sold individualized training sessions and video recordings in addition to the
20 live chat subscription memberships.

21 21. According to Defendants’ website, consumers who purchase a membership will
22 learn how to “Turn The [Stock] Market Into Your Personal Money Machine” and “achieve
23 consistent profits,” among other claims. Defendants purport to employ a team of “proven and
24 tested traders” who moderate a “live chat” service that is available only to individuals who have
25 purchased a subscription membership. Haworth personally leads the “live chat” service each day.
26 Defendants have paid monthly salaries to at least two other “moderators” who assist Haworth
27 from time to time, such as by leading the “live chat” while Haworth is taking a break.
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1 22. The key features of the “live chat” memberships marketed and sold by Defendants
2 are as follows. First, Haworth shares a list of approximately 12 stock trades each morning in a
3 members-only chat room before the stock market opens.¹ These recommendations, known as the
4 “pre-market game plan,” are timed to the daily movements and fluctuations of the stock market,
5 instructing subscribers to buy or sell stock in specific publicly-traded companies if the price
6 reaches certain benchmarks during the trading day. Haworth has published advertisements
7 claiming these stock picks are consistently profitable investments with a more than 90% success
8 rate, and that members can generate fast and consistent income simply by executing his “scripted”
9 trades each day.

10 23. Second, throughout the trading day, Haworth (and occasionally other “moderators”
11 salaried by Defendants) advise members in the “live chat” when and how to trade the
12 aforementioned recommended stocks based on the actual movements of the market. For example,
13 Haworth has explicitly stated that the reason members pay him to attend the live chat is that he is
14 a “clairvoyant” who can “read each stock and know exactly where it’s gonna go and why.”

15 24. Third, Haworth (and occasionally other moderators) provide personalized answers
16 to questions posed by “live chat” members during the trading day regarding the advisability of
17 specific stock transactions, in addition to answering more general questions about trading
18 strategies and the stock market.

19 25. Fourth, Haworth broadcasts his personal stock trades to the “live chat” members
20 and encourages members to mimic those transactions as a profitable trading strategy. In doing so,
21 Haworth takes personal stakes in many of the stocks he recommends to subscribers. Haworth
22 does not inform his clients that he has lost money trading stocks every year since at least 2016.

23 26. In general, Defendants advertise that anyone can profitably trade stocks by
24 following their trade recommendations and proprietary strategies. By selling these memberships,
25 Defendants operate a for-profit online business that advertises and sells personalized investment
26 advice and stock trade recommendations that supposedly will generate consistent investment

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28 ¹ Although Defendants also publish these lists on their website, such publication occurs after trading opens at 6:30 AM Pacific Time daily.

1 returns for subscribers. Defendants' website states that membership packages include daily lists
2 of stock trade recommendations, "high probability" trade alerts, and "guided" trades.

3 Personalized investment advice and trade recommendations are the Defendants' business.

4 27. Additionally, Defendants' website states that customers who purchase an
5 AwesomeCallsTrading subscription can "turn the market into your personal money machine,"
6 "surround yourself with success," and "profit from real traders & learn HOW to achieve
7 consistent profits," among other claims about the purported value of an AwesomeCallsTrading
8 membership. In fact, none of these claims are true because Haworth, the lead trader and
9 moderator of AwesomeCallsTrading's "live chat" sessions, is not a successful trader and has lost
10 money trading stocks every year since at least 2016.

11 28. Defendants' social media advertisements reinforce that the primary business of
12 AwesomeCallsTrading is selling supposedly profitable stock trade recommendations. Haworth
13 has touted the supposed benefits of membership via his public Twitter account, @AJTrader7, as
14 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 29. In a series of video advertisements available to the public on the
2 AwesomeCallsTrading Facebook and YouTube channels, Haworth has made other false or
3 misleading claims about the supposed value of an AwesomeCallsTrading membership, including:

- 4 • “This is the whole key. This is why AwesomeCalls exists. That's why
5 we're called AwesomeCallsTrading: because we provide a great call
6 before the market even opens, we predict the movement of the stock
7 before the market even opens, we, we, we pinpoint the direction of the
8 stock.”
- 9 • ““We actually know what the stock's gonna do, where it's gonna stop,
10 where it's gonna grind, and what they're gonna do two or three days
11 from now. Do you realize that? Say that again. We know how high it's
12 gonna go, we know where it's gonna sell off, we know where it's gonna
13 stop, we know that it's gonna grind out, and we know that there's going
14 to be an offering in about two or three days. This is the kind of chat
15 room you're in. We've predicted every movement of the stock before it
16 even could even trade at the opening bell.”
- 17 • ““You're learning how to play the stock, but I already know where it's
18 gonna go. Where is it gonna go? \$38 a share. And then there, it's gonna
19 stop. How do I know that? I'm AJ trader, most talented day trader in
20 the world, hands down. Right? I can predict the move before it even
21 happens.”
- 22 • ““Now imagine that, imagine bein' in a room with a guy who can tell
23 you this is where [a stock is] gonna stop, and this is where it's gonna
24 end up, and in between you can make all that money. Now I'm not
25 sayin' day trading is easy for you, but day trading is very clear,
26 clairvoyant for me. I 'm not sayin' it's easy, but I could see this
27 [expletive] all day long and I could read each stock and know exactly
28 where it's gonna go and why. And that's why people pay me, that's why
people come in.”
- ““Imagine \$1,000 a week in your pocket. Uh, \$1,000 a day. It's five, uh,
grand a week. It's \$20,000 a month, that's a quarter of a million a
year. Now I don't know what you do for a livin', but I'm tryin' to show
you that you could do this for a livin', you just have to apply yourself.”
- ““Now, based on these notes, these 12 ideas, you all could be making
thousands of dollars, or \$500 a day, or \$200 a day. I can't stress that
enough. \$250 a day is \$1250 a week. \$1,250 a week is roughly about
\$6,000 a month.”

1 30. Defendants do not practice, and lack specialized accreditation or licensure to
2 practice, professions including attorney at law, accountant, engineer, or teacher. Haworth does
3 not have any formal experience, licensure, certification, or training related to day trading or
4 financial investments and has never held any position of employment at a company that trades
5 stocks or manages investments.

6 31. Defendants' website and Haworth's @AJTrader7 social media account regularly
7 feature anecdotes about supposedly profitable trade recommendations and positive testimonials
8 from purported subscribers identified by their first name or social media handle. Despite
9 claiming that "[e]very day we receive hundreds of reviews from members and followers,"
10 Defendants' website does not publish any meaningful analysis or statistics about the average
11 returns that AwesomeCalls subscribers have earned in the stock market.

12 32. In truth, Haworth is not a profitable day trader and following his trades would not
13 help a customer earn any money, let alone beat the returns widely available from passive index
14 funds that track the overall stock market. Far from his portrayal as a seasoned and successful
15 trader, Haworth suffered a *net loss* trading stocks for his account *every year* since at least 2016.
16 He lost more than \$500,000 trading stocks in 2018, more than \$200,000 in 2019, and more than
17 \$14 million in 2020—a year during which the S&P 500 index *rose* 15.76%.

18 33. Haworth has tried to obscure his failings as a stock trader by telling clients and
19 prospective clients that (for example) he earns enough money from day trading stocks to support
20 a comfortable lifestyle in Beverly Hills and that by learning to predict how stocks will move in
21 the future, he has reliably earned \$1,000 or more every day the markets are open. According to
22 Defendants, customers who purchase an AwesomeCallsTrading membership can also earn
23 consistent income by executing Haworth's "scripted" trades, learning and implementing his
24 supposed day trading strategies, or both. In truth, Haworth's trade recommendations are
25 worthless at best and he does not impart any cogent trading or investment strategies that the
26 average person can reasonably implement to earn consistent profits.

27 34. The fine print on the "terms of service" section of Defendants' website also
28 contradicts the optimistic earnings claims touted by Haworth: boilerplate warnings that customers

1 should not buy or sell any securities based on the advice provided by AwesomeCallsTrading and
2 should rely instead on customers' independent research. Defendants buried these contradictory
3 disclaimers in a link at the bottom of their website homepage and did not require any customers
4 or prospective customers to read the terms of service before purchasing investment advice
5 memberships. In any event, such disclaimers do not immunize the sale of unlicensed investment
6 advice or other unlawful conduct.

7 35. Despite selling personalized investment advice to the public, none of the
8 Defendants have requested or obtained investment adviser certification from the California
9 Department of Financial Protection and Innovation, as required by Corporations Code section
10 25230. Nor have Defendants registered as investment advisers under federal law, including under
11 Section 203 of the Investment Advisers Act of 1940. In fact, Defendants' terms of service page
12 contains the following admission: "We are not registered as a securities broker-dealer or an
13 investment adviser either with the U.S. Securities and Exchange Commission or with any state
14 securities regulatory authority."

15 36. Investment advisors stand in a fiduciary relationship to their clients. The events
16 alleged herein are not the first time that Haworth has violated a duty of trust to his clients. In
17 December 2007, the State of California issued an administrative Order Barring Anthony J.
18 Haworth From Any Position of Employment, Management, Or Control Of Any Escrow Agent
19 ("2007 Order").² This administrative order found that Haworth and a real estate escrow company
20 he controlled commingled client trust funds, made unauthorized disbursements of several hundred
21 thousand dollars in trust funds, had a trust account shortage, and failed to maintain or provide
22 books and records including trust account reconciliations, among other violations of the
23 California Financial Code and regulations thereunder. Haworth did not contest the findings of the
24 State's Order. Defendants have not disclosed the 2007 Order to any clients or prospective clients
25 of AwesomeCallsTrading.

26 37. In December 2020, the Attorney General's Office notified Defendants that the
27 aforementioned membership services sold by Defendants appear to constitute investment advice

28 ² Available at <https://dfpi.ca.gov/wp-content/uploads/sites/337/2012/09/ie-bar.pdf>.

1 necessitating a valid certificate to act as an investment adviser. Days later, Haworth filed
2 paperwork with the Secretary of State requesting dissolution of AC and ACT, effective December
3 8, 2020. Around the same time, and without notifying the Attorney General’s Office, Haworth
4 formed a new limited liability company (ACL) in Puerto Rico. Haworth and ACL continue to
5 operate AwesomeCallsTrading as alleged above.

6 **FIRST CAUSE OF ACTION**
7 **(Violation of Corporations Code § 25230 by All Defendants)**

8 38. The People incorporate herein by reference the allegations in paragraphs 1-37 of
9 this Complaint.

10 39. Since approximately 2014, Defendants have received compensation in exchange
11 for advising customers as to the value of securities and the advisability of purchasing or selling
12 securities. Defendants have, among other business activities: published daily reports to paying
13 customers recommending specific security trades; advised customers in real-time when and how
14 to execute security trades on the aforementioned lists; provided personalized answers to questions
15 posed by customers regarding the advisability of stock market transactions; and encouraged
16 customers to mimic Defendants’ moderators personal stock trades as a profitable trading strategy.
17 Defendants are investment advisers as defined by California Corporations Code section 25009(a)
18 and do not qualify for any of the exceptions stated therein.

19 40. Defendants have continuously violated Corporations Code section 25230(a) by
20 selling the aforementioned investment advice while failing to apply for and secure from the
21 Department of Financial Protection and Innovation a certificate authorizing Defendants to
22 conduct business as an investment advisor. Defendants do not qualify for any statutory
23 exemption from the section 25230(a) certification requirement and are not registered under
24 Section 203 of the Investment Advisers Act of 1940.

25 41. As the sole executive, director, and owner of AC, ACT, and ACL, and the face of
26 AwesomeCallsTrading, individual defendant Haworth personally communicated the foregoing
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1 investment advice to paying customers and received most or all of Defendants' net profits from
2 the unlawful sales of his unregistered investment advice.

3 **SECOND CAUSE OF ACTION**
4 **(Violation of Corporations Code § 25235 by All Defendants)**

5 42. The People incorporate herein by reference the allegations in paragraphs 1-41 of
6 this Complaint.

7 43. Since approximately 2014, Defendants have continuously sold and marketed
8 several forms of advice, alleged above, as to the value of securities and the advisability of
9 purchasing or selling securities. Defendants are investment advisers as defined by California
10 Corporations Code section 25009(a) and do not qualify for any of the exceptions stated therein.

11 44. Under California Corporations Code section 25235, it is "unlawful for any
12 investment adviser, directly or indirectly, in this state: (a) To employ any device, scheme, or
13 artifice to defraud any client or prospective client[,] (b) To engage in any transaction, practice, or
14 course of business which operates or would operate as a fraud or deceit upon any client or
15 prospective client[, or . . .] (d) To engage in any act, practice, or course of business which is
16 fraudulent, deceptive, or manipulative." Defendants have engaged in acts, practices, and a course
17 of business that violate Corporations Code section 25235 as well as regulations published
18 thereunder, including but not limited to California Code of Regulations 260.235 and 260.235.4.

19 45. Defendants have engaged in acts, practices, and a course of business of falsely
20 stating and advertising that Haworth is a talented and successful day trader.

21 46. Defendants have engaged in acts, practices, and a course of business of falsely
22 stating and advertising that Haworth has the ability to help AwesomeCallsTrading clients earn
23 money trading stocks, including by executing the scripted stock trades in Haworth's daily "pre-
24 market game plan," executing the trades that Haworth recommends in live chat, copying his
25 personal stock trades, or all of the above.

26 47. Defendants have failed to disclosed that, far from being a talented or successful
27 trader, Haworth has lost money trading stocks every year since at least 2016. Defendants have
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1 failed to disclose that Haworth has been subject to legal or disciplinary events that are material to
2 his integrity, including a 2008 administrative order of the State of California charging Haworth
3 with violations of California Financial Code 17000 *et seq.* and regulations thereunder.

4 48. In reliance on Haworth's false statements and advertisements, clients have paid
5 money to Defendants for membership to the AwesomeCallsTrading live chat room. These
6 memberships are, at best, worthless, as Haworth is not a profitable day trader and cannot help
7 anyone consistently improve their stock trading returns.

8 **THIRD CAUSE OF ACTION**
9 **(Violation of Business & Professions Code section 17500 *et seq.* by All Defendants)**

10 49. The People incorporate herein by reference the allegations in paragraphs 1-48 of
11 this Complaint.

12 50. Defendants have violated, and continue to violate, Business and Professions Code
13 section 17500 by making or disseminating, or causing to be made or disseminated, before the
14 public in this State, untrue or misleading statements in connection with the sale of the
15 AwesomeCallsTrading memberships alleged above, including but not limited to statements that
16 Haworth is a successful day trader and that Haworth has the ability to help AwesomeCallsTrading
17 members earn income by trading stocks. Defendants knew or should have known their statements
18 were untrue or misleading, for among other reasons, Haworth personally lost money trading
19 stocks every year since at least 2016.

20 **FOURTH CAUSE OF ACTION**
21 **(Violation of Business & Professions Code section 17200 *et seq.* by All Defendants)**

22 51. The People incorporate herein by reference the allegations in paragraphs 1-50 of
23 this Complaint.

24 52. Defendants have engaged, and continue to engage, in unlawful, unfair, or
25 fraudulent acts or practices, which constitute unfair competition within the meaning of Business
26 and Professions Code section 17200 *et seq.* Defendants' acts or practices include, but are not
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1 limited to, violating Corporations Code section 25230(a), Corporations Code section 25235,
2 and/or Business and Professions Code section 17500 *et seq.*

3 **PRAYER FOR RELIEF**

4 Wherefore Plaintiff, the People of the State of California, pray for relief against all
5 Defendants as follows:

6 1. Pursuant to Government Code section 12658(a) and/or Business and Professions
7 Code sections 17203, 17204, and 17535, for an order permanently enjoining Defendants and all
8 persons acting under, in concert with, or for them, from directly or indirectly or in any other
9 manner engaging in the aforementioned conduct in violation of Corporations Code sections
10 25230(a) and 25235, and/or any acts or practices that violate Business and Professions Code
11 sections 17200 *et seq.* and 17500 *et seq.*;

12 2. Pursuant to Government Code section 12660(a) and/or Business and Professions
13 Code sections 17206 and 17536, for an order that Defendants pay a civil penalty for each
14 violation of Corporations Code sections 25230(a) and 25235, and for each violation of Business
15 and Professions Code sections 17200 *et seq.* and 17500 *et seq.*, in an amount according to proof
16 but not less than \$1,000,000;

17 3. Pursuant to Government Code section 12658(b) and (c) and/or Business and
18 Professions Code sections 17203, 17204, and 17535, for an order or judgment as may be
19 necessary to restore to any person in interest any money or other property that Defendants may
20 have acquired by violation of law alleged herein and according to proof, which on information
21 and belief total more than \$3,000,000;

22 4. Pursuant to Code of Civil Procedure section 1021.8(a), that the People recover
23 their costs of investigation and suit, including expert fees, attorney's fees, and costs; and
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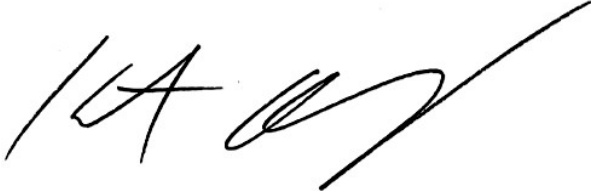
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5. Such further or additional relief as the Court deems proper.

Dated: October 22, 2021

Respectfully Submitted,

ROB BONTA
Attorney General of California



KURT B. OLDENBURG
Deputy Attorney General
Attorneys for the People of the State of California

1 **PROOF OF ELECTRONIC SERVICE**
2 **CCP 1010.6, 1013(g), CRC Rule 2.251(c)**

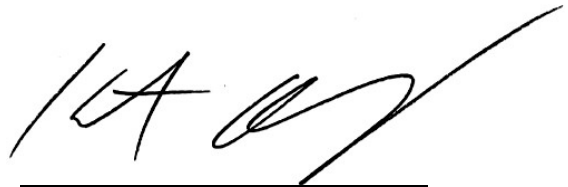
3 I, the undersigned, declare as follows:

4 I am employed in the Office of the Attorney General and am a member of the California
5 State Bar. I am 18 years of age or older and not a party to this matter. On the undersigned date, I
6 served **PLAINTIFF'S FIRST AMENDED COMPLAINT** to **Defendants AwesomeCalls, Inc.,**
7 **AwesomeCallsTrading, Inc.,** and **Anthony J. Haworth** by transmitting a true and correct a
8 copy thereof through electronic service via Case Anywhere, addressed as follows:

9 Michael G. Freedman
10 The Freedman Firm PC
11 michael@thefreedmanfirm.com

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed on October 22, 2021 at Sacramento, California.

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Kurt B. Oldenburg

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES	
Branch Name: Spring Street Courthouse Mailing Address: 312 North Spring Street City, State and Zip Code: Los Angeles CA 90012	
SHORT TITLE: THE PEOPLE OF THE STATE OF CALIFORNIA vs AWESOMECALLS, INC., et al.	CASE NUMBER: 21STCV04430
NOTICE OF CONFIRMATION OF ELECTRONIC FILING	

The Electronic Filing described by the below summary data was reviewed and accepted by the Superior Court of California, County of LOS ANGELES. In order to process the filing, the fee shown was assessed.

Electronic Filing Summary Data

Electronically Submitted By: One Legal
Reference Number: 17109425
Submission Number: 21LA04256002
Court Received Date: 10/22/2021
Court Received Time: 9:43 am
Case Number: 21STCV04430
Case Title: THE PEOPLE OF THE STATE OF CALIFORNIA vs AWESOMECALLS, INC., et al.
Location: Spring Street Courthouse
Case Type: Civil Unlimited
Case Category: Securities Litigation Case
Jurisdictional Amount:
Notice Generated Date: 10/22/2021
Notice Generated Time: 10:11 am

Documents Electronically Filed/Received

Status

Amended Complaint	Accepted
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Comments

Submitter's Comments:

Clerk's Comments:

Electronic Filing Service Provider Information

Service Provider: One Legal
Contact: One Legal
Phone: (800) 938-8815