

COMMONWEALTH OF KENTUCKY  
53<sup>rd</sup> JUDICIAL CIRCUIT  
SHELBY CIRCUIT COURT  
CIVIL ACTION NO: \_\_\_\_\_

COMMONWEALTH OF KENTUCKY  
*ex rel.* ANDY BESHEAR, ATTORNEY GENERAL

PLAINTIFF

**COMPLAINT**

TRAVEL CRAZY, INC.

DEFENDANT

SHERIFF, SERVE:

KENNETH R. HARP  
REGISTERED AGENT  
3000 OLD CLARK STATION ROAD  
FISHERVILLE, KENTUCKY 40023

and

PLUSTOURS, INC.

DEFENDANT

SHERIFF, SERVE:

KENNETH R. HARP  
REGISTERED AGENT  
3000 OLD CLARK STATION ROAD  
FISHERVILLE, KENTUCKY 40023

KENNETH R. HARP, Individually

DEFENDANT

SHERIFF, SERVE:

KENNETH R. HARP  
3000 OLD CLARK STATION ROAD  
FISHERVILLE, KENTUCKY 40023

\*\*\* \*\*

Comes the Plaintiff, the Commonwealth of Kentucky *ex rel.* ANDY BESHEAR, ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY, and for his Complaint against Defendants TRAVEL CRAZY, INC., PLUSTOURS, INC. and KENNETH R. HARP, individually, states as follows:

## PRELIMINARY STATEMENT

Defendant KENNETH R. HARP (hereinafter “Harp”) is the sole officer, shareholder and agent of Defendant TRAVEL CRAZY, INC. (hereinafter “Travel Crazy”). Defendant Harp sells group travel and tour package trips to various destinations. However, in recent months, Defendant Harp has taken money and deposits for package trips to various locations, including, but not limited to, New York City, to have taken place in the fall of 2017, and St. Louis, to have taken place in March of 2018, from its customers, cancelled those trips and failed to refund the customers’ money pursuant to the terms of the Travel Crazy contract. *See* Travel Crazy Terms and Conditions attached hereto as Exhibit A.

Although initially Defendant Harp agreed via letter to refund his customers’ money, as of the date of the filing of this Complaint, Defendant Harp has refused to refund this money. *See* letters from Defendant Harp to customers attached hereto as Exhibit B.

The Office of the Attorney General of Kentucky, the Better Business Bureau and the Shelby County Sheriff’s Office have received at least 40 total consumer complaints against Harp and Travel Crazy, totaling at least \$91,318. *See* Affidavit of Angela Hockensmith Pane, Executive Advisor with the Office of the Attorney General of the Commonwealth of Kentucky attached hereto as Exhibit C. The Shelby County Sheriff’s Office has received more than twenty (20) consumer complaints against Harp and Travel Crazy. *See* Affidavit of Detective Mark Moore of the Shelby County Sheriff’s Office attached hereto as Exhibit D.

On February 23, 2018, Defendant Harp wrote a letter to customers advising them that Travel Crazy was “going through a tumultuous year,” would be filing bankruptcy and that the affected customers would receive notification from the United States Bankruptcy Court with information on how to file a proof of claim. *See* letter from Defendant Harp of February 23, 2018, attached hereto as Exhibit E. As of the date of the filing of this Complaint, none of the

Defendants has filed a bankruptcy action. Defendant Harp has stopped all communication with the customers and has refused to refund their money.

Instead, on March 15, 2018, Defendant Harp, under the laws of the Commonwealth of Kentucky, formed PlusTours, Inc., which, based upon information and belief, is a new group travel and tour company selling package trips much like Defendant Harp did with Defendant Travel Crazy. Defendant Harp is the sole officer, shareholder and agent of Defendant PLUSTOURS, INC. (hereinafter PlusTours). On information and belief, Defendant Harp is continuing to solicit new consumers for travel packages under PlusTours and/or Travel Crazy, and it is likely that additional consumers will be harmed by these actions.

Defendants' practices constitute unfair, false, misleading or deceptive conduct prohibited by the Kentucky Consumer Protection Act, and this action is in the public interest to protect the general public, seek restitution for consumers harmed by Defendants' actions and inactions and assess civil penalties at the discretion of this Court. Concurrently with the filing of this Complaint, the Attorney General is seeking an *ex parte* temporary injunction and restraining order in the interest of both minimizing victimization of additional consumers by the Defendants and preserving any assets available to satisfy unrefunded payments.

As such, the Office of the Attorney General of Kentucky files this action against Defendants Harp, Travel Crazy and PlusTours.

## **I. PARTIES, JURISDICTION AND VENUE**

1. Plaintiff, the Commonwealth of Kentucky *ex rel.* Andy Beshear, Attorney General, is responsible for the enforcement and administration of Kentucky law, including the Kentucky Consumer Protection Act, KRS 367.110 *et. seq.* (hereinafter "KCPA"). He is authorized by KRS 367.190 to bring this action in the name of the Commonwealth of Kentucky and has determined it to be in the public interest to do so.

2. Defendant, TRAVEL CRAZY, INC., is a for-profit Kentucky corporation with its principal place of business located at 709 Mt. Eden Road, Suite 2, Shelbyville, Kentucky 40065.

3. Defendant, PLUSTOURS, INC., is a for-profit Kentucky corporation with its principal place of business located at 3000 Old Clark Station Road, Fisherville, Kentucky 40023.

4. Defendant, KENNETH R. HARP, is the registered agent for and the sole officer and shareholder of Defendant TRAVEL CRAZY, INC. and Defendant PLUSTOURS, INC.

5. Defendant, KENNETH R. HARP, is a Kentucky resident who resides at 3000 Old Clark Station Road, Fisherville, Kentucky 40023.

6. This Court has jurisdiction over this matter pursuant to KRS 367.190(1), because the Attorney General has reason to believe that Defendants are using or have used methods, acts or practices declared to be unlawful by KRS 367.110 *et. seq.*, and that these proceedings are in the public interest.

7. Venue is proper in Shelby County pursuant to KRS 367.190(1), because 1) Defendant Travel Crazy has its principal place of business in Shelby County and 2) many of Defendant Travel Crazy's and Defendant Harp's methods, acts and practices declared to be unlawful by KRS 367.170 were committed or are about to be committed in Shelby County.

## II. LAW

8. Plaintiff adopts, reiterates and realleges each and every allegation in Part I of this Complaint as if fully set out herein.

9. Pursuant to KRS 367.170, "[u]nfair, false, misleading or deceptive acts or practices in the conduct of any trade or commerce are...unlawful."

10. Pursuant to KRS 367.190, “[w]henver the Attorney General has reason to believe that any person is using, has used, or is about to use any method, act or practice declared by KRS 367.170 to be unlawful, and that proceedings would be in the public interest, he may immediately move in the name of the Commonwealth in a Circuit Court for a restraining order or temporary or permanent injunction to prohibit the use of such method, act or practice.”

11. Pursuant to KRS 367.200, “[t]he court may make such additional orders or judgments as may be necessary to restore to any person in interest any moneys or property, real or personal, which may have been paid out as a result of any practice declared to be unlawful by KRS 367.130 to KRS 367.300...”

12. Pursuant to KRS 367.990(2), if the court finds a person is willfully violating or has willfully violated the KCPA, a civil penalty of “not more than two thousand dollars (\$2,000.00) per violation” may be imposed.

### III. FACTS

13. Plaintiff adopts, reiterates and realleges each and every allegation in Parts I and II of this Complaint as if fully set out herein.

14. Defendant Harp is the sole officer, shareholder and agent of Travel Crazy, Inc.

15. Defendant Harp is the sole officer, shareholder and agent of PlusTours, Inc.

16. Carolyn Murphy is a resident of Shelby County, Kentucky. *See* Affidavit of Carolyn Murphy attached hereto as Exhibit F.

17. Carolyn Murphy paid \$2,158 to Defendant Harp of Travel Crazy for a package trip to New York City that was to have occurred in October 2017. Defendant Harp cancelled the package trip to New York City and did not refund Carolyn Murphy’s \$2,158.

18. Opal Gardner is a resident of Shelby County, Kentucky. *See* Affidavit of Opal Gardner attached hereto as Exhibit G.

19. Opal Gardner paid \$636 to Defendant Harp of Travel Crazy for a package trip to Branson, Missouri that was to have occurred in September 2017. Defendant Harp cancelled the package trip to Branson, Missouri and did not refund Opal Gardner's \$636.

20. Nettie Wilson is a resident of Jefferson County, Kentucky. *See* Affidavit of Nettie Wilson attached hereto as Exhibit H.

21. Nettie Wilson paid \$3,098 to Defendant Harp of Travel Crazy for a trip to the SEC Basketball Tournament in Nashville, Tennessee, that was to have occurred in spring 2017. Defendant Harp cancelled the package trip to Nashville, Tennessee, and did not refund Nettie Wilson's \$3,098. Subsequently, Nettie Wilson, at the suggestion of Defendant Harp, booked a trip to Chicago, Illinois, that was to have occurred in November 2017 at a cost of \$1,976 by applying a portion of the money she had already paid to Defendants for the cancelled Nashville trip. Defendant Harp then cancelled the package trip to Chicago, Illinois, and did not refund Nettie Wilson's money. Subsequently, Nettie Wilson, again applying the money she had paid for the cancelled trip to Nashville, and at the suggestion of Defendant Harp, booked a trip to St. Louis, Missouri, for the SEC Basketball Tournament that was to have occurred in March 2018. Defendant Harp then cancelled the package trip to St. Louis, Missouri, and did not refund any of Nettie Wilson's money.

22. Shirley Robinson is a resident of Jefferson County, Kentucky. *See* Affidavit of Shirley Robinson attached hereto as Exhibit I.

23. Shirley Robinson paid \$1,599 to Defendant Harp in \$200 monthly installments for a package trip to the 2018 SEC Basketball Tournament in St. Louis, Missouri, that was to have occurred in March 2018. Defendant Harp cancelled the trip and did not refund Shirley Robinson's \$1,599.

24. The foregoing consumers are presented as examples of the unfair, false, misleading or deceptive acts or practices of Defendants to establish jurisdiction, venue and cause of action, and are not intended as an exhaustive list of victims identified to date by the Office of the Attorney General and the Shelby County Sheriff's Office.

25. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, accepted monetary payments and deposits for package trips from Kentucky residents and placed said monies in deposit accounts in at least three banks: Commonwealth Bank and Trust, Citizens Union Bank and Fifth-Third Bank.

26. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, cancelled, at a minimum, four (4) package trips and did not refund any money to customers, despite language in the package trips' terms and conditions stating a refund shall be given.

27. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, refused to refund, at a minimum, \$66,627 to at least thirty-nine (39) of his Kentucky customers.

28. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, has not discontinued the Travel Crazy website, which is located at [www.travelcrazyonline.com](http://www.travelcrazyonline.com) and contains unfair, false, misleading and/or deceptive information. *See* Travel Crazy homepage attached hereto as Exhibit J.

29. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, has failed to maintain, at a minimum, two of the three advertised telephone numbers of Travel Crazy, Inc.

30. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, has ceased all communication with Travel Crazy's customers.

31. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, solely participated or substantially directed the day-to-day operations of Travel Crazy, Inc.

32. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, solely participated in the act of taking money from customers, providing no service to them and refusing to refund their money.

33. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, exercised such dominion and control over Travel Crazy as to result in a loss of the corporate separateness of Travel Crazy.

34. Defendant Harp, as Travel Crazy's sole officer, shareholder and agent, exercised absolute domination and control over Travel Crazy in such a way as to cause harm to the residents of the Commonwealth of Kentucky, including, but not limited to, Carolyn Murphy, Opal Gardner, Shirley Robinson and Nettie Wilson.

35. Treatment of Travel Crazy as a separate corporate entity would promote injustice and fundamental unfairness.

36. Defendant Harp, as PlusTours' sole officer, shareholder and agent, solely participated or substantially directed the day-to-day operations of PlusTours, Inc.

37. Defendant Harp, as PlusTours' sole officer, shareholder and agent, exercised such dominion and control over PlusTours as to result in a loss of the corporate separateness of PlusTours.

38. Defendant Harp, as PlusTours' sole officer, shareholder and agent, exercised absolute domination and control over PlusTours in such a way as to cause harm to the residents of the Commonwealth of Kentucky.

39. Treatment of PlusTours as a separate corporate entity would promote injustice and fundamental unfairness.

40. Defendant Travel Crazy's aforementioned actions were willful.

41. Defendant Harp's aforementioned actions were willful.



42. Defendant PlusTours' actions were willful.

43. The foregoing acts constitute unfair, false, misleading and/or deceptive acts and/or practices in violation of KRS 367.170.

**IV. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays for Judgment against all Defendants as follows:

- a) That Defendants Harp, Travel Crazy, and PlusTours be permanently enjoined and prohibited from violating the KCPA, KRS 367.170;
- b) For a Judgment finding willful violation of the KCPA, KRS 367.170 as to Defendants Harp, Travel Crazy and PlusTours;
- c) For an award of restitution for damages caused by the willful violations of KRS 367.170;
- d) For restoration of property pursuant KRS 367.200;
- e) For disgorgement of profits pursuant to KRS 367.200;
- f) For an award of civil penalties pursuant to KRS 367.990(2) in an as of yet to be determined amount, with interest at the statutory rate for civil judgments, for each willful violation of KRS 367.170;
- g) For Plaintiff to be awarded its costs and expenses herein, including litigation and investigation;
- h) For a trial by jury on all issues so triable;
- i) Any and all other relief to which Plaintiff may appear to be entitled.

Respectfully submitted,

ANDY BESHEAR  
 ATTORNEY GENERAL  
/s/ Andrew G. Downey  
 Andrew G. Downey  
/s/ Jonathan E. Farmer  
 Jonathan E. Farmer

Todd Leatherman  
Assistant Attorneys General  
Office of Attorney General  
Office of Consumer Protection  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601  
Telephone: (502) 696-5300  
Andy.Downey@ky.gov  
Jonathan.Farmer@ky.gov  
Todd.L Leatherman@ky.gov

Maryellen B. Mynear  
Assistant Deputy Attorney General  
Office of the Kentucky Attorney General  
700 Capitol Avenue, Suite 118  
Frankfort, KY 40601-3449  
Phone: (502) 696-5300  
Maryellen.Mynear@ky.gov

# Trip Terms and Conditions

## **Smoking:**

Smoking is not permitted in the motorcoach. We will be making stops throughout the day for those who wish to smoke. Hotels automatically assign non-smoking rooms for groups. SMOKING ROOMS must be requested. Please make request when you send back

## **Alcoholic Beverages:**

Alcoholic beverages are not permitted on the motorcoach unless otherwise stated under "Additional Information" on front side of this

## **Trip Costs:**

Trip costs are based on individual rates. Multi-night trips which include hotel accommodations are based on double-occupancy/per person. Those requiring single occupancy will be subject to additional charges.

## **Trip Cost Includes:**

All transportation, hotel or motel accommodations, tours, guides, admission fees, sightseeing, Travel Crazy, Inc's attendants, and meals, that are specified in your itinerary.

## **Trip Cost Does Not Include:**

Meals and tips not included in your itinerary, maids, servers, laundry services, phone calls, room service, alcoholic beverages, and any other personal incidentals.

## **Gratuities:**

It is Travel Crazy, Inc's policy that attendants not accept tips. Gratuities can be made to the bus driver, but only on a voluntary basis.

## **Minors:**

Children under the age of 18 must be accompanied by parent or adult legal guardian unless otherwise stated under "Additional Information" on front side of this form.

## **Travelers Needing Special Assistance:**

Any disability needing special assistance should be reported at time of initial reservation. TRAVEL CRAZY, INC will make reasonable attempts to accommodate but are not responsible for denial of services from hotels, carriers, restaurants and suppliers. We regret that we cannot provide individual assistance for walking, dining, etc. Such travelers should be accompanied by a qualified companion.

## **Refunds:**

Refunds for cancellations are processed once a month. If you have not received your refund within 30 days, please contact our office.

## **Responsibilities:**

Travel Crazy, Inc. is acting as agents for the passengers in arranging and sponsoring the various accommodations, events, transportation conveyance, and other items that are made available and assumes no liability/responsibility in connection with said services. Services rendered by any vessel, carriage, or other conveyance, sightseeing, event, restaurant, hotel/motel accommodations, or any other accommodation, event, or equipment used in the performance of said trip is not the responsibility of Travel Crazy, Inc.

Travel Crazy, Inc. can assume no responsibility for any delay, injury, accident, failure, or sickness incurred while using any and all leased services. Travel Crazy, Inc. can assume no responsibility for strife, quarantine, acts of god, or acts of civil disturbance, war, or other causes. All such losses will be borne by passenger as trip rates provide for arrangements only for the time stated.

Travel Crazy, Inc. reserves the right to decline to accept or retain anyone as a member of a trip and to cancel or alter trip as required. No refund will be made for voluntary absence from any trip or for any absence of less than 3 nights unless arrangements are made at the time of booking. Travel Crazy, Inc. will depart promptly at designated times. No refunds will be issued to anyone not arriving at departure point on time. Baggage damage and personal injury are at the passengers risk entirely. Owners of businesses allowing us to use their property as a pick up point are not responsible for automobiles parked at their properties during a trip. Travel Crazy, Inc. is not responsible for automobiles parked at any pick-up point during trip. Travel Crazy, Inc. reserves the right to use photographs taken by Travel Crazy, Inc. Staff on trips in promotional materials, or post as downloadable photos for our clients from our website. The issuance or acceptance of your voucher, tickets, or passage shall be deemed as consent and acceptance of the above stated conditions.

## **Additional Information:**

Travel Crazy, Inc. DOES NOT reserve specific seats on our buses. Travel Crazy, Inc. DOES NOT provide or use name badges. Travel Crazy, Inc. DOES NOT rotate our seating arrangements during our trips.

Travel Crazy, Inc has been very fair with regard to handling cancellations for our trips. Through the years we have been willing to be very flexible regarding the handling of last minute cancellations. Because of this, we have incurred considerable costs for prepaid segments of our trips. All cancellations will be handled in accordance with the stated policy on your trip confirmation contract. No Exceptions. We have cancellation insurance available to you through Travelex to protect you in case of emergency situations.

**Your signature on this confirmation and the issuance or acceptance of your voucher, tickets, or passage shall be deemed as consent and acceptance of the above stated conditions.**

**PLEASE NOTE: We will mail out an Update containing departure points & times, hotel information & luggage tags (for overnight trips), and additional information pertaining to your trip 10-14 days prior to trip departure.**

**EXHIBIT**

**A**

tabbles



# TRAVEL crazy

2-25-17

## TRIP CANCELLATION NOTICE

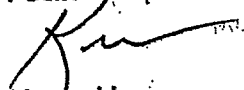
While in Missouri I heard from my supplier of SEC tickets informing me that he could only get 18 tickets this year for the Tournament. Since I returned home from Missouri I have looked at online sites and talked to Nashville brokers about additional ticket availability. The cost of available seats do not meet the amount budgeted for the trip.

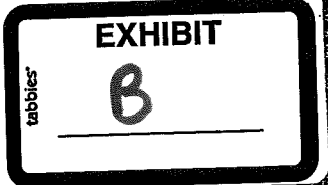
We have been doing our SEC tournament trips since 1994 and have never had this happen before.

The bottom line is I must cancel our SEC Tourney trip.

I will refund your money as soon as I get the money back from the hotel in Nashville and the refund for the game tickets I already purchased

I can't express my regrets enough to offset your deep disappointment.

  
Kevin Harp  
Travel Crazy

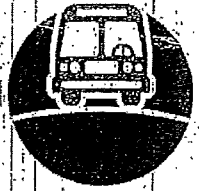


CRUISE LINES  
INTERNATIONAL  
ASSOCIATION, INC.

709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047





# TRAVEL CRAZY

09-05-17

## TRIP CANCELLATION NOTICE

We regret to inform you that we have had to cancel our Branson trip scheduled for the September 18, 2017 departure.

Cancellations are a painful process for us, but low booking numbers have lowered our numbers below minimum levels.

We started out with a decent number of bookings, we also put the trip in our last catalog, but in spite of that, the bookings slowly diminished. The failure to meet the minimum requirement for the hotel and resulting rate increase would have caused a considerable loss on the trip.

We are waiting for the Bus Company and the Hospitality Company in Branson to refund all payments already paid.

The current refunds will be processed in accordance with the terms listed on the back of your confirmation and mailed the last week of the month.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

Thank you,

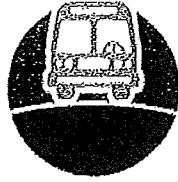
Kenn Harp  
Travel Crazy



709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047





# TRAVEL crazy

10-01-17

## TRIP CANCELLATION NOTICE

We regret to inform you that we have had to cancel our NYC Fall trip scheduled for the October 9, 2017 departure.

Cancellations are a painful process for us, but low booking numbers have lowered our numbers below minimum levels.

We started out with a decent number of bookings, and then booking tapered off. The failure to meet the minimum requirement for the hotel and resulting rate increase would have caused a considerable loss on the trip.

We are waiting for the Bus Company and the NYC hotel to refund all deposit payments already paid.

The current refunds will be processed in accordance with the terms listed on the back of your confirmation and mailed the last week of the month.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

Thank you,

  
Kenn Harp  
Travel Crazy



709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047





# TRAVEL crazy

11-06-17

## TRIP CANCELLATION NOTICE


We regret to inform you that we have had to cancel our Champions Classic Chicago trip scheduled for the November 13, 2017 departure.

Cancellations are a painful process for us, but availability and higher costs of admission tickets to the games would cause a considerable loss that we cannot absorb.

You will be refunded the monies laid on the trip within 30 days.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

Thank you,

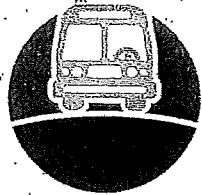
  
Ken Harp  
Travel Crazy



709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047





# TRAVEL crazy

February 23, 2018

Dear Client:

We regret to inform you that we had to cancel our 2018 SEC Tournament trip scheduled for a March 7 departure.

Travel Crazy has been going through a tumultuous year.

Because of that we have acquired an attorney and are in the process of filing Bankruptcy.

Once we have finalized the process, you will receive a notice in the mail from the bankruptcy court on how to file a claim.

Kenn Harp  
Travel Crazy

709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047



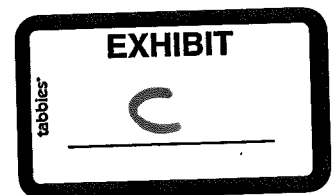
**AFFIDAVIT OF ANGELA HOCKENSMITH PANE**

I, Angela Hockensmith Pane, being first duly sworn, do hereby depose and state as follows:

1. I am a resident of Franklin County, Kentucky and am over the age of eighteen (18).
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. I am an Executive Advisor for the Office of the Attorney General of the Commonwealth of Kentucky.
4. The Office of the Attorney General of Kentucky has received twenty-five (25) complaints against Travel Crazy and Kenneth Harp.
5. The Office of the Attorney General of Kentucky has reviewed four (4) additional complaints from the Better Business Bureau against Travel Crazy and Kenneth Harp.
6. The Office of the Attorney General of Kentucky has reviewed eleven (11) additional complaints from the Shelby County Sheriff's Office against Travel Crazy and Kenneth Harp.
7. The forty (40) complainants have lost a total of at least \$91,138 to Kenneth Harp and Travel Crazy.
8. As of the date of this Affidavit, neither Kenneth Harp, nor Travel Crazy, nor PlusTours has filed for bankruptcy according to the PACER system.

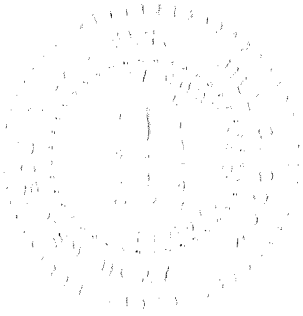
I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE. FURTHER, AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Angela Hockensmith Pane



COMMONWEALTH OF KENTUCKY )  
COUNTY OF FRANKLIN )

Subscribed and sworn to before me, a Notary Public, by ANGELA HOCKENSMITH  
PANE, on this 2 day of May 2018.



Julie C. Cook  
NOTARY PUBLIC

My commission expires: 6-22-2019

**AFFIDAVIT OF MARK MOORE**

I, MARK MOORE, being first duly sworn, do hereby depose and state as follows:

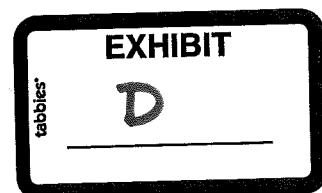
1. I am a resident of Shelbyville County, Kentucky and I am over the age of eighteen (18) years.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. I am currently employed as a Detective with the Shelby County Sherriff's Office. I have been an employee of the Shelby County Sherriff's Office since 2005. I have worked in law enforcement for over thirty-five years.
4. As part of my job duties, I am responsible for leading investigations. I led my Office's investigation of Kenn Harp and Travel Crazy. This investigation included receiving complaints against Kenn Harp and Travel Crazy.
5. My office received over twenty (20) complaints from victims of Kenn Harp and Travel Crazy. My office received information indicating that an additional 30 individuals were also victims of Kenn Harp and Travel crazy.

I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE. FURTHER, AFFIANT SAYETH NAUGHT.




MARK MOORE

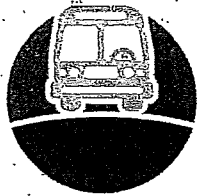
COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF SHELBY )



Subscribed and sworn to before me, a Notary Public, by JONATHAN FARMER, on this  
30th day of April, 2018.

  
NOTARY PUBLIC

My commission expires: 2/12/19



# TRAVEL crazy

February 23, 2018

Dear Client:

We regret to inform you that we had to cancel our 2018 SEC Tournament trip scheduled for a March 7 departure.

Travel Crazy has been going through a tumultuous year.

Because of that we have acquired an attorney and are in the process of filing Bankruptcy.

Once we have finalized the process, you will receive a notice in the mail from the bankruptcy court on how to file a claim.

Kenn Harp  
Travel Crazy

709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047

EXHIBIT

tabbles

E

**AFFIDAVIT OF CAROLYN MURPHY**

I, Carolyn Murphy, being first duly sworn, do hereby depose and state as follows:

1. I am a resident of Shelbyville, Shelby County, Kentucky. I am over sixty (60) years old.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. My husband and I booked a trip to New York City with Kenn Harp from Travel Crazy. The trip cost \$1,079 each for a total of \$2,158. We sent a check dated July 17, 2017, for the full amount to Travel Crazy. The trip was to depart on October 9, 2017.
4. On October 2, 2017, we received a "Trip Cancellation Notice" from Kenn Harp. See Attachment 1. The letter stated: "Cancellations are a painful process for us, but low booking numbers have lowered our numbers below minimum levels. We started out with a decent number of bookings, and then booking tapered off. The failure to meet the minimum requirement for the hotel and resulting rate increase would had [sic] caused a considerable loss on the trip. We are waiting for the Bus Company and the NYC hotel to refund all deposit payments already paid. The current refunds will be processed in accordance with the terms listed on the back of your confirmation and mailed the last week of the month."
5. It has been months since we received this cancellation notice and we still have not received our refund.
6. We made repeated calls to Kenn Harp with Travel Crazy. My husband went to Travel Crazy's office located in Shelby County, Kentucky and spoke to Kenn Harp. None of those efforts resulted in us receiving a refund.
7. For all matters related to this trip we have worked directly with Kenn Harp.



I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE. FURTHER, AFFIANT SAYETH NAUGHT.

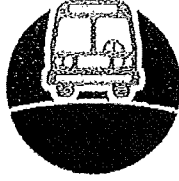
*Carolyn Murphy*  
Carolyn Murphy

COMMONWEALTH OF KENTUCKY    )  
  )  
COUNTY OF SHELBY                                )

Subscribed and sworn to before me, a Notary Public, by CAROLYN MURPHY, on this 27<sup>th</sup>, day of April, 2018.

*Tracy C. Kelly*  
NOTARY PUBLIC

My commission expires: 2/12/19



# TRAVEL CRAZY

10-01-17

## TRIP CANCELLATION NOTICE

We regret to inform you that we have had to cancel our NYC Fall trip scheduled for the October 9, 2017 departure.

Cancellations are a painful process for us, but low booking numbers have lowered our numbers below minimum levels.

We started out with a decent number of bookings, and then booking tapered off. The failure to meet the minimum requirement for the hotel and resulting rate increase would have caused a considerable loss on the trip.

We are waiting for the Bus Company and the NYC hotel to refund all deposit payments already paid.

The current refunds will be processed in accordance with the terms listed on the back of your confirmation and mailed the last week of the month.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

Thank you,

Ken Harp  
Travel Crazy



709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047



EXHIBIT

tabbles

1



## AFFIDAVIT OF OPAL GARDNER

I, Opal Gardner, being first duly sworn, do hereby depose and state as follows:

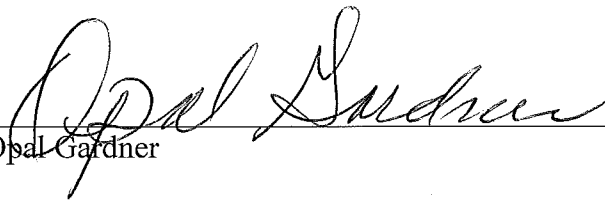
1. I am a resident of Shelby County, Kentucky. I am over sixty (60) years old.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. I booked a trip to Branson, Missouri with Kenn Harp from Travel Crazy. The trip cost \$636. I sent a check dated May 29, 2017, for the full amount to Travel Crazy. The trip was to depart on September 18, 2017.
4. On September 5, 2017, I received a "Trip Cancellation Notice" from Kenn Harp. See Attachment 1. The letter stated: "Cancellations are a painful process for us, but low booking numbers have lowered our numbers below minimum levels. We started out with a decent number of bookings, we also put the trip in our last catalog, but in spite of that, the bookings slowly diminished. The failure to meet the minimum requirement for the hotel and resulting rate increase would had [*sic*] caused a considerable loss on the trip. We are waiting for the Bus Company and the hospitality company in Branson to refund all payments already paid. The current refunds will be processed in accordance with the terms listed on the back of your confirmation and mailed the last week of the month."
5. I booked a second trip to Chicago, Illinois with Kenn Harp from Travel Crazy. The trip cost \$640. I sent a check dated June 18, 2017, for the full amount to Travel Crazy. The trip was to depart on November 13, 2017.
6. On November 6, 2017, I received a "Trip Cancellation Notice" from Kenn Harp. See Attachment 2. The letter stated: "Cancellations are a painful process for us, but availability and higher costs of admission tickets to the games would cause a



considerable loss that we cannot absorb. You will be refunded the monies laid on the trip within 30 days.”

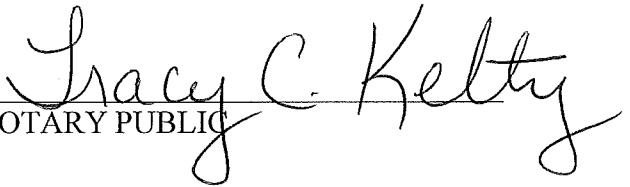
- 7. It has been months since I received these cancellation notices and I still have not received refunds.
- 8. For all matters related to this trip I worked directly with Kenn Harp.

I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE. FURTHER, AFFIANT SAYETH NAUGHT.

  
 \_\_\_\_\_  
 Opal Gardner

COMMONWEALTH OF KENTUCKY    )  
   )  
 COUNTY OF SHELBY                    )

Subscribed and sworn to before me, a Notary Public, by OPAL GARDNER, on this 27<sup>th</sup> day of April, 2018.

  
 \_\_\_\_\_  
 NOTARY PUBLIC

My commission expires: 2/12/19



# TRAVEL CRAZY

09-05-17

## TRIP CANCELLATION NOTICE

We regret to inform you that we have had to cancel our Branson trip scheduled for the September 18, 2017 departure.

Cancellations are a painful process for us, but low booking numbers have lowered our numbers below minimum levels.

We started out with a decent number of bookings, we also put the trip in our last catalog, but in spite of that, the bookings slowly diminished. The failure to meet the minimum requirement for the hotel and resulting rate increase would have caused a considerable loss on the trip.

We are waiting for the Bus Company and the Hospitality Company in Branson to refund all payments already paid.

The current refunds will be processed in accordance with the terms listed on the back of your confirmation and mailed the last week of the month.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

Thank you,

Kenn Harp  
Travel Crazy



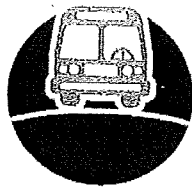
709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047



EXHIBIT

tabbies



# TRAVEL crazy

11-06-17

## TRIP CANCELLATION NOTICE

We regret to inform you that we have had to cancel our Champions Classic Chicago trip scheduled for the November 13, 2017 departure.

Cancellations are a painful process for us, but availability and higher costs of admission tickets to the games would cause a considerable loss that we cannot absorb.

You will be refunded the monies laid on the trip within 30 days.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

Thank you,

Ken Harp  
Travel Crazy



CRUISE LINES  
INTERNATIONAL  
ASSOCIATION, INC.

709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047



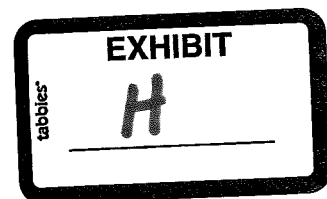
EXHIBIT

2

**AFFIDAVIT OF NETTIE WILSON**

I, Nettie Wilson, being first duly sworn, do hereby depose and state as follows:

1. I am a resident of Jefferson County, Kentucky. I am over sixty (60) years old.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. My husband and I booked a trip to Nashville, Tennessee for the 2017 SEC Basketball Tournament with Kenn Harp from Travel Crazy. The trip cost \$3,098. The trip was to depart in spring 2017.
4. Kenn Harp cancelled the trip.
5. My husband and I booked a second trip to Chicago, Illinois with Kenn Harp from Travel Crazy. The trip cost \$1,976. The trip was to depart on November 13, 2017.
6. On November 6, 2017, I received a "Trip Cancellation Notice" from Kenn Harp. See Attachment 1. The letter stated: "Cancellations are a painful process for us, but availability and higher costs of admission tickets to the games would cause a considerable loss that we cannot absorb. You will be refunded the monies laid on the trip within 30 days."
7. Kenn Harp allowed us to transfer the balance from his cancelling the 2017 SEC Tournament trip to Nashville, Tennessee to the 2018 trip to the SEC Tournament in St. Louis, Missouri. My husband and I used this balance to book the trip to the 2018 SEC tournament in St. Louis, Missouri with Kenn Harp from Travel Crazy. The trip cost \$1,439 each for a total of \$2,878. The trip was to depart on March 7, 2018.
8. On February 23, 2018, I received a "Trip Cancellation Notice" from Kenn Harp. See Attachment 2. The letter stated: "We regret to inform you that we had to cancel our 2018



SEC Tournament trip scheduled for a March 7 departure. Travel Crazy has been through a tumultuous year. Because of that we have acquired an attorney and are in the process of filing Bankruptcy.”

9. It has been months since I received these cancellation notices and I still have not received refunds.

10. For all matters related to this trip I worked directly with Kenn Harp.

I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE. FURTHER, AFFIANT SAYETH NAUGHT.

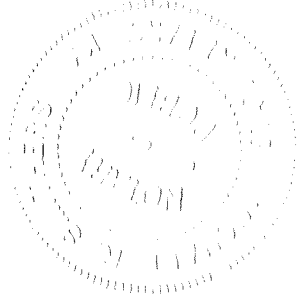
*Nettie Wilson*  
\_\_\_\_\_  
Nettie Wilson

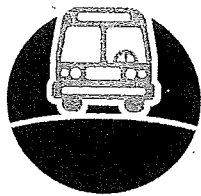
COMMONWEALTH OF KENTUCKY    )  
  )  
COUNTY OF SHELBY            )

Subscribed and sworn to before me, a Notary Public, by NETTIE WILSON, on this 27<sup>th</sup> day of April, 2018.

*Mark Stotts*  
\_\_\_\_\_  
NOTARY PUBLIC

My commission expires: Notary Public, State at Large, KY  
My commission expires Nov. 22, 2018





# TRAVEL crazy

11-06-17

## TRIP CANCELLATION NOTICE

We regret to inform you that we have had to cancel our Champions Classic Chicago trip scheduled for the November 13, 2017 departure.

Cancellations are a painful process for us, but availability and higher costs of admission tickets to the games would cause a considerable loss that we cannot absorb.

You will be refunded the monies laid on the trip within 30 days.

We do want to thank you for choosing to book with us and we hope this cancellation will not prevent us from seeing you on another trip real soon.

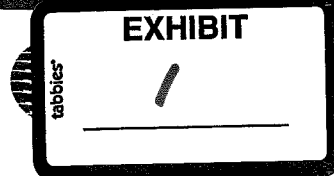
Thank you,

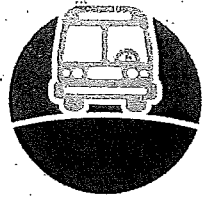
  
Ken Harp  
Travel Crazy



709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047





# TRAVEL crazy

February 23, 2018

Dear Client:

We regret to inform you that we had to cancel our 2018 SEC Tournament trip scheduled for a March 7 departure.

Travel Crazy has been going through a tumultuous year.

Because of that we have acquired an attorney and are in the process of filing Bankruptcy.

Once we have finalized the process, you will receive a notice in the mail from the bankruptcy court on how to file a claim.

Kenn Harp  
Travel Crazy

709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047

EXHIBIT

tabbies

2



AFFIDAVIT OF SHIRLEY ROBINSON

I, Shirley Robinson, being first duly sworn, do hereby depose and state as follows:

1. I am a resident of Washington County, Kentucky. I am over sixty (60) years old.
2. I am competent to testify to the facts alleged herein, and I have personal knowledge of these facts.
3. I booked a trip to the 2018 SEC tournament in St. Louis, Missouri with Kenn Harp from Travel Crazy. The trip cost \$1,599. I made monthly payments of \$200 to pay for the trip. The trip was to depart on March 7, 2018.
4. On February 23, 2018, I received a "Trip Cancellation Notice" from Kenn Harp. See Attachment 1. The letter stated: "We regret to inform you that we had to cancel our 2018 SEC Tournament trip scheduled for a March 7 departure. Travel Crazy has been through a tumultuous year. Because of that we have acquired an attorney and are in the process of filing Bankruptcy."
5. It has been over two months since I received this cancellation notice and I still have not received a refund.
6. For all matters related to this trip I worked directly with Kenn Harp.

I AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE. FURTHER, AFFIANT SAYETH NAUGHT.

  
 \_\_\_\_\_  
 Shirley Robinson

COMMONWEALTH OF KENTUCKY    )  
   )  
 COUNTY OF WASHINGTON        )

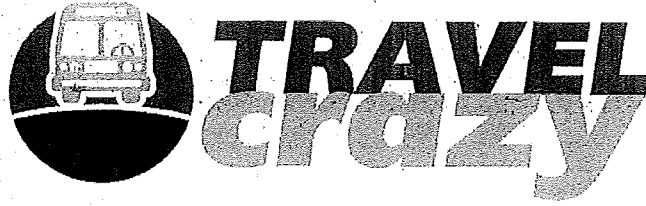


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30 Subscribed and sworn to before me, a Notary Public, by SHIRLEY ROBINSON, on this day of April, 2018.

Paul m Wingate  
NOTARY PUBLIC

My commission expires: 2/13/19



February 23, 2018

Dear Client:

We regret to inform you that we had to cancel our 2018 SEC Tournament trip scheduled for a March 7 departure.

Travel Crazy has been going through a tumultuous year .

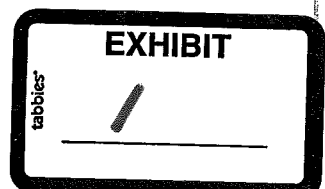
Because of that we have acquired an attorney and are in the process of filing Bankruptcy.

Once we have finalized the process, you will receive a notice in the mail from the bankruptcy court on how to file a claim.

Kenn Harp  
Travel Crazy

709 Mt. Eden Rd, Suite 2  
Shelbyville, KY 40065

Louisville: 502-213-0576  
Lexington: 859-215-0061  
Fax: 866-603-4047





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Classic New York  
June 19 - 23, 2017

0 (0)  
\$999.00



CONFERENCE TOURNEY  
March 7 - 11, 2018

0 (0)  
\$1,599.00



Christmas at the Opryland Hotel the Travel Crazy Way!  
December 13 - 15, 2017

0 (0)  
\$525.00



Champions Classic  
November 13 - 15, 2017

0 (0)  
\$988.00



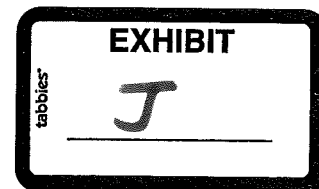
Branson Fall Trip  
September 18th - 21st, 2017

0 (0)  
\$734.00



New England In September  
September 15 - 23, 2017

0 (0)  
\$1,099.00



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