

02-1131-CD
Comm of PA vs Paul E. Bloom al

02

02-1131-CD
COMMONWEALTH OF PENNSYLVANIA -vs- PAUL E. BLOOM et al

Paul E Bloom
1023 Apt B
Hill St.
Philipsburg PA
16860

Current Judge: Fredric Joseph Ammerman

Commonwealth of Pennsylvania vs. Paul E. Bloom, Bloom's Home Improvements

Civil Other

Date	Judge
7/22/2002 ✓ Filing: Complaint in Equity and Petition for Permanent Injunction Paid by: Commonwealth of Pennsylvania Receipt number: 1845826 Dated: 07/22/2002 Amount: \$80.00 (Check) Three CC Attorney	No Judge
7/29/2002 ✓ Entry of Appearance filed on behalf of Defendant by Att. Gearhart. No cc.	No Judge
8/1/2002 ✓ Certificate of Service, Complaint in Equity and Petition for a Permanent Injunction upon the Defendant, PAUL E. BLOOM, ind. and d/b/a BLOOM'S HOME IMPROVEMENTS Filed by s/Timothy B. Shirey no cc	No Judge
11/22/2002 ✓ Filing: Judgment Paid by: Janet Mulrney Receipt number: 1851740 Dated: 11/22/2002 Amount: \$20.00 (Check) Notice to Defendant and his Attorney. Statement to Commonwealth.	No Judge
11/26/2002 ✓ Motion For Leave To Withdraw As Counsel For Defendant. filed by s/R. Denning Gearhart, Esq. 3 cc Atty Gearhart	No Judge
12/11/2002 ✓ ORDER RETURNABLE, AND NOW THIS, 11th day of December, 2002, issued upon PAUL E. BLOOM. Rule Returnable the 31st day of December, 2002, at 9:00 a.m. by the Court, s/JKR,JR.,P.J. 3 cc Atty Gearhart	John K. Reilly Jr.
12/31/2002 ✓ Affidavit of Mailing of Motion to Withdraw as Counsel. no CC.	John K. Reilly Jr.
1/2/2003 ✓ ORDER, AND NOW, this 31st day of December, 2002, re: Motion is GRANTED, R. Denning Gearhart is hereby WITHDRAWN as the attorney of record for Defendant, Paul E. Bloom, Ind. and d/b/a Bloom's Home Improvements. by the Court, s/JKR,JR.,P.J. 1 cc Atty Creary, Gearhart, and Defendant Bloom	John K. Reilly Jr.
2/5/2003 ✓ Motion For Hearing For Adjudication and Framing of Decree. filed by s/E. Barry Creany, Esquire Certificate of Service 2 cc Atty Creany	John K. Reilly Jr.
2/11/2003 ✓ ORDER, AND NOW, this 11th day of February, 2003, re: Hearing for the purpose of receiving testimony and evidence to assist this Court in its adjudication and framing of a final decree pursuant to Pa.R.C.P. 1151(b) is hereby set for 1:30 p.m. on the 26th day of March, 2003, in Courtroom No. 1. by the Court, s/JKR,JR.,P.J. 2 Dcc Atty Creany	John K. Reilly Jr.
3/21/2003 ✓ ✓ Affidavit of Service filed by T. Shirey Served Paul E. Bloom with copy of scheduling hearing.	John K. Reilly Jr.
4/2/2003 ✓ ✓ Notice, filed by Defendant Paul E. Bloom, Deny all and any allegations set forth on civil action 021131-CD and pray the court to dismiss all allegations and or the Court to assist me with counsel for that I am unable to afford.	John K. Reilly Jr.
4/9/2003 ✓ ✓ ORDER filed. Cert. to Creany & P. Bloom AND NOW, this 8th day of April, 2003, Defendant to paid Mr. & Mrs. Jerry Smith \$2,262.79 in restitution. Defendant to paid Commonwealth \$5,000.00 Defendant to paid Commonwealth \$100.00 Prothonotary shall enter judgment against Paul E. Bloom in favor of Commonwealth of Pennsylvania in the amount of \$7,362.79 Judgment entered against Paul E. Bloom in the amount of \$7326.79 Notice to Defendant	John K. Reilly Jr.
7/31/2003 ✓ ✓ Petition For Rule to Show Cause Why Contempt Sanctions Should Not Issue. filed by s/Margie A. Anderson, Esq., Deputy AG 2 cc Atty Anderson	John K. Reilly Jr.

Current Judge: John K. Reilly Jr.

Commonwealth of Pennsylvania vs. Paul E. Bloom, Bloom's Home Improvements

Civil Other

Date	Judge	
07/22/2002	Filing: Complaint in Equity and Petition for Permanent Injunction Paid by: Commonwealth of Pennsylvania Receipt number: 1845826 Dated: 07/22/2002 Amount: \$80.00 (Check) Three CC Attorney	No Judge
07/29/2002	Entry of Appearance filed on behalf of Defendant by Att. Gearhart. No cc.	No Judge
08/01/2002	Certificate of Service, Complaint in Equity and Petition for a Permanent Injunction upon the Defendant, PAUL E. BLOOM, ind. and d/b/a BLOOM'S HOME IMPROVEMENTS Filed by s/Timothy B. Shirey no cc	No Judge
11/22/2002	Filing: Judgment Paid by: Janet Mulroney Receipt number: 1851740 Dated: 11/22/2002 Amount: \$20.00 (Check) Notice to Defendant and his Attorney. Statement to Commonwealth.	No Judge
11/26/2002	Motion For Leave To Withdraw As Counsel For Defendant. filed by s/R. Denning Gearhart, Esq. 3 cc Atty Gearhart	No Judge
12/11/2002	RULE RETURNABLE, AND NOW THIS 11th day of December, 2002, issued upon PAUL E. BLOOM. Rule Returnable the 31st day of December, 2002, at 9:00 a.m. by the Court, s/JKR,JR.,P.J. 3 cc Atty Gearhart	John K. Reilly Jr.
12/31/2002	Affidavit of Mailing of Motion to Withdraw as Counsel. no CC.	John K. Reilly Jr.
01/02/2003	ORDER, AND NOW, this 31st day of December, 2002, re: Motion is GRANTED, R. Denning Gearhart is hereby WITHDRAWN as the attorney of record for Defendant, Paul E. Bloom, Ind. and d/b/a Bloom's Home Improvements. by the Court, s/JKR,JR.,P.J. 1 cc Atty Creary, Gearhart, and Defendant Bloom	John K. Reilly Jr.
02/05/2003	Motion For Hearing For Adjudication and Framing of Decree. filed by s/E. Barry Creany, Esquire Certificate of Service 2 cc Atty Creany	John K. Reilly Jr.
02/11/2003	ORDER, AND NOW, this 11th day of February, 2003, re: Hearing for the purpose of receiving testimony and evidence to assist this Court in its adjudication and framing of a final decree pursuant to Pa R.C.P. 1151(b) is hereby set for 1:30 p.m. on the 26th day of March, 2003, in Courtroom No. 1. by the Court, s/JKR,JR.,P.J. 2 Dcc Atty Creany	John K. Reilly Jr.
03/21/2003	Affidavit of Service filed by T. Shirey Served Paul E. Bloom with copy of scheduling hearing.	John K. Reilly Jr.
04/02/2003	Notice, filed by Defendant I Paul E. Bloom, Deny all and any allegations set forth on civil action 021131-CD and pray the court to dismiss all allegations and or the Court to assist me with counsel for that I am unable to afford.	John K. Reilly Jr.
04/09/2003	ORDER filed. Cert. to Creany & P. Bloom AND NOW, this 8th day of April, 2003, Defendant to paid Mr. & Mrs. Jerry Smith \$2,262.79 in restitution. Defendant to paid Commonwealth \$5,000.00 Defendant to paid Commonwealth \$100.00 Prothonotary shall enter judgment against Paul E. Bloom in favor of Commonwealth of Pennsylvania in the amount of \$7,362.79 Judgment entered against Paul E. Bloom in the amount of \$7326.79 Notice to Defendant	John K. Reilly Jr.
07/31/2003	Petition For Rule to Show Cause Why Contempt Sanctions Should Not Issue. filed by s/Margie A. Anderson, Esq., Deputy AG 2 cc Atty Anderson	John K. Reilly Jr.

Date: 5/28/2008

Time: 03:36 PM

Page 2 of 2

Clearfield County Court of Common Pleas

User: LMILLER

ROA Report

Case: 2002-01131-CD

Current Judge: Fredric Joseph Ammerman

Commonwealth of Pennsylvania vs. Paul E. Bloom, Bloom's Home Improvements

Civil Other

Date		Judge
8/1/2003	<input checked="" type="checkbox"/> RULE UPON RESPONDENT TO SHOW CAUSE WHY CONTEMPT SANCTIONS SHOULD NOT ISSUE, AND NOW, this 1st day of August, 2003, issued upon the Respondent. Respondent shall within 20 days of this Rule provide to the Commonwealth an accounting of all income received from April 1, 2003, the the date of this Rule, supported by all documentation evidencing all income received within this time period. Rule Returnable and a Hearing is scheduled for the 11th day of Sept., 2003, at 3:00 p.m. by the Court, s/JKR,JR.,P.J. 2 cc Atty Anderson	John K. Reilly Jr.
9/11/2003	<input checked="" type="checkbox"/> Certificate of Service of Petition for Rule to show Cause filed by Timothy Shirey. 1 CC to Atty. Creany.	John K. Reilly Jr.
9/12/2003	<input checked="" type="checkbox"/> ORDER, NOW, this 11th day of September, 2003, re; Argument on Plaintiff's Petition for Sanctions. by the Court, s/JKR,JR.,P.J. 2 cc Atty Creany, 1 cc def.	John K. Reilly Jr.
5/1/2008	<input checked="" type="checkbox"/> Petition for Contempt, filed by s/ Margie A. Anderson Esq. 5CC Atty Anderson	John K. Reilly Jr.
5/6/2008	<input checked="" type="checkbox"/> Order, this 6th day of May, 2008, a hearing on the Petition for Contempt is set for the 4th day of June, 2008, in Courtroom 1 @ 9:30 a.m. By The Court, /s/ Fredric J. Ammerman, pres. Judge. 5 CC Atty. Anderson	Fredric Joseph Ammerman
5/19/2008	<input checked="" type="checkbox"/> Affidavit of Service filed. Served copies of the Petition for Contempt and the May 6, 2008 Order upon Paul E. Bloom by hand delivery on May 15, 2008. filed by s/ Lawrence J. Hoover, Senior Agent of Office of Attorney General.	Fredric Joseph Ammerman

6-5-08 X order, dated 6-4-08

6-13-08 X return mail

6-18-08 X return mail

7-18-08 order, dated 9-15-08

3-5-09 Order, dated 3-5-09

Date: 09/12/2003

Time: 12:47 PM

Page 2 of 2

Clearfield County Court of Common Pleas

User: DGREGG

ROA Report

Case: 2002-01131-CD

Current Judge: John K. Reilly Jr.

Commonwealth of Pennsylvania vs. Paul E. Bloom, Bloom's Home Improvements

Civil Other

Date	Judge
08/01/2003	John K. Reilly Jr.
09/11/2003	John K. Reilly Jr.
09/12/2003	John K. Reilly Jr.

8/01/2003 X RULE UPON RESPONDENT TO SHOW CAUSE WHY CONTEMPT SANCTIONS SHOULD NOT ISSUE, AND NOW, this 1st day of August, 2003, issued upon the Respondent. Respondent shall within 20 days of this Rule provide to the Commonwealth an accounting of all income received from April 1, 2003, the the date of this Rule, supported by all documentation evidencing all income received within this time period. Rule Returnable and a Hearing is scheduled for the 11th day of Sept., 2003, at 3:00 p.m. by the Court, s/JKR,JR.,P.J. 2 cc Atty Anderson Certificate of Service of Petition for Rule to show Cause filed by Timothy Shirey. 1 CC to Atty. Creany.

09/11/2003 X ORDER, NOW, this 11th day of September, 2003, re; Argument on Plaintiff's Petition for Sanctions. by the Court, s/JKR,JR.,P.J. 2 cc Atty Creany, 1 cc def.

1
2 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 PLAINTIFF
8

v.

9 PAUL E. BLOOM, individually, and d/b/a
10 BLOOM'S HOME IMPROVEMENTS

No. 02-1131-CO

11 COMPLAINT IN EQUITY AND
12 PETITION FOR PERMANENT
13 INJUNCTION

14 DEFENDANT
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19 COUNSEL FOR PLAINTIFF
20

21 E. BARRY CREAMY
22 SENIOR DEPUTY ATTORNEY GENERAL
23 ATTORNEY I.D. NO. 39543
24 BUREAU OF CONSUMER PROTECTION
25 EBENSBURG REGIONAL OFFICE
26 171 LOVELL AVENUE, SUITE 202
27 EBENSBURG, PA 15931
28 (814) 471-1831

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3 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
4

5 COMMONWEALTH OF PENNSYLVANIA
6 ACTING BY ATTORNEY GENERAL
7 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

8 PLAINTIFF
9

No.

v.

10
11 PAUL E. BLOOM, individually, and d/b/a
12 BLOOM'S HOME IMPROVEMENTS

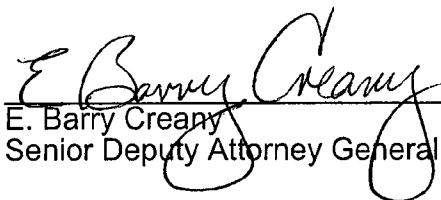
13 DEFENDANT
14

15 **NOTICE**

16 YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE
17 CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN
18 TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY
19 ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND
20 FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE
21 CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO
22 SO THE CASE MAY PROCEED WITHOUT YOU AND JUDGMENT MAY BE ENTERED
23 AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY
24 CLAIMED IN THE PETITION OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY
25 THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS
26 IMPORTANT TO YOU. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT
27 ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR
28 TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET
LEGAL HELP.

1
2 Keystone Legal Services
3 211 1/2 East Locust Street
4 Clearfield, PA 16830
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DATE: July 19, 2002


E. Barry Creamy
Senior Deputy Attorney General

1
2
3 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
4

5 COMMONWEALTH OF PENNSYLVANIA
6 ACTING BY ATTORNEY GENERAL
7 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

8 PLAINTIFF

No.

9 v.

10 PAUL E. BLOOM, individually, and d/b/a
11 BLOOM'S HOME IMPROVEMENTS

12 DEFENDANT

13
14 COMPLAINT IN EQUITY AND PETITION
15 FOR PERMANENT INJUNCTION

16 AND NOW, this 19th day of July, 2002, comes the Commonwealth of Pennsylvania
17 acting by Attorney General D. Michael Fisher, through the Bureau of Consumer Protection,
18 and brings this action pursuant to the Unfair Trade Practices and Consumer Protection
19 Law, Act of December 17, 1968, P.L. 1224, as amended and re-enacted by the Act of
20 November 24, 1976, P.L. 1166, No. 260, the Act of December 3, 1996, 73 P.S. §201-1, et
21 seq., (hereinafter referred to as the "Consumer Protection Law"). The Consumer
22 Protection Law authorizes the Attorney General to bring an action in the name of the
23 Commonwealth of Pennsylvania to restrain by temporary and/or permanent injunction,
24 unfair methods of competition or unfair or deceptive acts or practices in the conduct of any
25 trade or commerce declared unlawful by §201-3 of the Consumer Protection Law. In
26 support of this action the Commonwealth respectfully represents the following:

27

28

JURISDICTION AND VENUE

2 1. This Court has jurisdiction in this matter pursuant to 42 Pa.C.S. §931(a).

3 2. Venue in this judicial district is proper under 42 Pa.C.S. §931(c) and Pa.

4 R.C.P. No. 1503.

THE PARTIES

7 3. Plaintiff is the Commonwealth of Pennsylvania, acting by Attorney
8 General D. Michael Fisher, through the Bureau of Consumer Protection, Ebensburg
9 Regional Office, 171 Lovell Avenue, Suite 202, Ebensburg, Cambria County,
10 Pennsylvania.

11 4. Defendant Paul E. Bloom is an adult individual who resides at Hyde Trailer
12 Park, Lot #6, Bigler, Clearfield County, Pennsylvania, who has engaged in trade and
13 commerce within the Commonwealth of Pennsylvania, individually and through his
14 company, Bloom's Home Improvements, from a principal place of business located at Hyde
15 Trailer Park, Lot #6, Bigler, Clearfield County, Pennsylvania.

16 5. The Commonwealth has reason to believe that the Defendant is using,
17 has used or is about to use methods, acts or practices declared unlawful by §201-3 of the
18 Consumer Protection Law.

19 6. The Commonwealth believes that the public interest is served by seeking this
20 Court to enter a permanent injunction to restrain the methods, acts and practices of the
21 Defendant as hereinafter set forth. Further, the Commonwealth requests restitution, civil
22 penalties, costs and other appropriate equitable relief as redress for violations of the
23 Consumer Protection Law.

24 7. At all times relevant and material hereto the unlawful methods, acts and
25 practices complained of herein have been willfully used by the Defendant.

FACTUAL BACKGROUND

2 8. Defendant established Bloom's Home Improvements as a sole proprietorship
3 on or before May 1, 2001.

4 9. The Defendant advertised for sale, offered for sale and sold residential home
5 improvement services to consumers located within the Commonwealth of Pennsylvania,
6 including consumers within Clearfield County. A true and correct copy of the business card
7 that the Defendant used in advertising Bloom's Home Improvements is attached hereto
8 and labeled Exhibit "A".

9 10. The Defendant entered into contracts for residential home improvement
10 services with consumers as a result of, or in connection with, a contact with or call upon
11 the consumers at the consumers' residences in person (hereinafter referred to as "home
12 improvement contracts").

13 11. Defendant entered into home improvement contracts with consumers which
14 were signed in the consumers' homes.

15 12. The Defendant has accepted payments for residential home improvement
16 services in connection with said home improvement contracts.

17 13. After entering into home improvement contracts and accepting payment from
18 consumers for home improvement services the Defendant failed to perform any home
19 improvement services or, in the alternative, failed to fully complete the home improvement
20 services provided for in said home improvement contracts.

21 14. Pennsylvania consumers, including consumers in Clearfield County, have
22 suffered losses as a result of the Defendant's unfair and deceptive acts and practices.
23 Consumers harmed by Defendant's practices include, but are not limited to, Mr. and Mrs.
24 Jerry L. Smith of R.D. 2, Box 176, Morrisdale, Clearfield County, Pennsylvania, consumers
25 over the age of sixty (60) who entered into a home improvement contract with the
26 Defendant on September 28, 2001, which provided for the Defendant to remove old
27 shingles and reshingle their home. The Smiths paid the Defendant \$3,200.00 of the
28 \$5,400.00 contract price on September 28, 2001, and Defendant was to promptly begin

1 work on the Smith's house. On October 19, 2001, Defendant ordered materials for the
2 Smiths' house but never performed any home improvement services on the Smiths' house.
3 The Defendant paid for some of the materials for the Smith roofing job, however, as a
4 result of his failure to perform the Smiths have suffered losses in the amount of \$2,262.79.
5 A true and correct copy of the contract between Defendant and the Smiths and a receipt
6 evidencing the Smith's payment to the Defendant is attached hereto and labeled Exhibit
7 "B".

8

9

COUNT I

10

CONSUMER LAW VIOLATIONS

11 15. Paragraphs 1 through 14 of the foregoing complaint are incorporated
12 herein by reference.

13 16. The Defendant entered into home improvement contracts with consumers,
14 accepted payment for home improvement services to be performed and then failed to
15 perform any home improvement services or, in the alternative, failed to fully complete the
16 home improvement services provided for in said home improvement contracts and as a
17 result consumers have suffered losses equal to the amount they have paid for home
18 improvement services which were not performed or were not fully completed.

19 17. The Defendant has contracted to perform home improvement services for
20 residential consumers which were not completed in a good and workmanlike manner and
21 as a result consumers have suffered losses in connection with the completion or repair of
22 the project that was the subject of their home improvement contract.

23 18. The Defendant falsely represented to consumers that he had insurance
24 coverage or other benefits that he did not have.

25 19. The acts, practices and methods of competition set forth above are unlawful
26 and in violation of the Consumer Protection Law in that they constitute unfair methods of
27 competition and unfair or deceptive acts or practices in the conduct of trade or commerce

28

1 as defined by §201-2(4)(ii), (iii), (v), (vii), (ix), (xi), (xiv), (xvi), and (xxi) of the Consumer
2 Protection Law.

3 20. Defendant has caused and continues to cause irreparable harm by violating
4 the Consumer Protection Law and, therefore, the Commonwealth requests the relief set
5 forth in the Prayer for Relief below.

COUNT II

DEFENDANT USES ILLEGAL CONTRACTS

9 21. Paragraphs 1 through 14 of the foregoing complaint are incorporated herein
10 by reference.

11 22. Defendant has used contracts which violate the provisions of §201-7(b)(1)
12 and (2) of the Consumer Protection Law and the Federal Trade Commission Rule
13 concerning a Cooling-Off-Period for Door-To-Door Sales, 16 C.F.R. §429, 37 Fed.Reg. No.
14 22934, by failing to include the required notice of cancellation in the contract itself and by
15 not using the notice of cancellation form required to be attached to such contracts.

16 23. The Defendant has used contracting practices which violate the provisions
17 of §201-7(d) of the Consumer Protection Law by having failed to orally inform consumers
18 at the time they sign contracts of their right to cancel.

19 24. The acts, practices and methods of competition set forth above are unlawful
20 and in violation of the Consumer Protection Law in that they constitute unfair methods of
21 competition and unfair or deceptive acts or practices in the conduct of trade or commerce
22 as defined in §201-2(4)(xxi) of the Consumer Protection Law.

23 25. Defendant has caused and continues to cause irreparable harm by
24 violating the Consumer Protection Law and, therefore, the Commonwealth requests the
25 relief set forth in the Prayer For Relief below.

PRAYER FOR RELIEF

2 WHEREFORE, the Commonwealth respectfully requests this Honorable Court
3 to issue an Order:

4 A. Permanently enjoining the Defendant from engaging in the aforementioned
5 acts, practices, methods of competition or any other practice violative of the Consumer
6 Protection Law or other state law;

7 B. Directing Defendant to permanently forfeit his right to engage in trade and
8 commerce within the Commonwealth of Pennsylvania by entering into any home
9 improvement contracts either individually, through any person acting on his behalf, as a
10 partner, or through any corporate or business device;

11 C. Directing the Defendant to make full restitution to all consumers who
12 suffered losses as the result of Defendant's business practices as alleged in this complaint;

13 D. Directing the Defendant to pay civil penalties in the amount of One Thousand
14 and 00/100 Dollars (\$1,000.00) for each and every violation of the Consumer Protection
15 Law, which will increase to Three Thousand and 00/100 Dollars (\$3,000.00) for each
16 violation involving a victim age 60 or older;

17 E. Directing the Defendant to pay the Commonwealth for the costs of its
18 investigation and prosecution of this action; and,

19 F. Providing such other equitable relief as the Court may deem appropriate
20 and necessary.

22 || DATE: July 19, 2002

RESPECTFULLY SUBMITTED,

D. MICHAEL FISHER
ATTORNEY GENERAL

FRANK T. DONAGHUE
CHIEF DEPUTY ATTORNEY GENERAL

E. BARRY CREAMY
SENIOR DEPUTY ATTORNEY GENERAL

1 COUNTY OF CAMBRIA)
2)
3)
4) SS:
5 COMMONWEALTH OF PENNSYLVANIA)
6)
7)
8)
9 **AFFIDAVIT**

10
11 I, Timothy B. Shirey, being duly sworn according to law, depose and state that I am
12 an Agent for the Office of Attorney General, Bureau of Consumer Protection,
13 Commonwealth of Pennsylvania and that I am authorized to make this Affidavit and that
14 the facts set forth in the foregoing Complaint in Equity and Petition for Permanent
15 Injunction are true and correct to the best of my knowledge, information and belief.
16
17

Tim Shirey

18
19 Timothy B. Shirey
20 Consumer Protection Agent
21
22
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24

25
26 Sworn and subscribed to before me
27 this 19th day of July, 2002.
28

Denise J. Powers
26 Denise J. Powers, Notary
27

28 Notarial Seal
Denise J. Powers, Notary Public
Ebensburg Boro, Cambria County
My Commission Expires Nov. 18, 2002

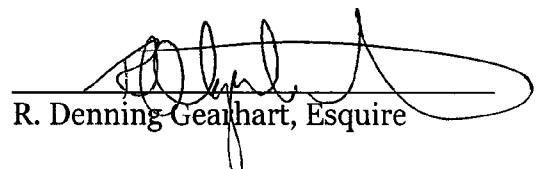
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, Plaintiff :
VS. : NO. 02-1131-CD
: :
PAUL E. BLOOM, individually and d/b/a :
BLOOM'S HOME IMPROVEMENTS, :
Defendant :
:

ENTRY OF APPEARANCE

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please enter my appearance on behalf of the Defendant, PAUL E. BLOOM individually and d/b/a BLOOM'S HOME IMPROVEMENTS, in the above captioned matter.


R. Denning Gearhart, Esquire

Date: July 29, 2002

FILED

JUL 29 2002
012-041nocC
William A. Shaw
Prothonotary

1 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

2

3 COMMONWEALTH OF PENNSYLVANIA
4 ACTING BY ATTORNEY GENERAL
4 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

5 PLAINTIFF

6 v.

No. 02-1131-C.D.

7 PAUL E. BLOOM, individually, and d/b/a
8 BLOOM'S HOME IMPROVEMENTS

10 DEFENDANT

12 CERTIFICATE OF SERVICE

13 I, Timothy B. Shirey, do hereby affirm that I served a certified copy of the Complaint in
14 Equity and Petition for a Permanent Injunction upon the defendant, Paul E. Bloom, individually and
15 d/b/a Bloom's Home Improvements by hand delivering the same to him at his residence at Hyde
16 Trailer Park, Lot #6, Hyde, Clearfield County, Pennsylvania, on Monday, July 22, 2002, at
17 approximately 3:23 P.M.

18

19 Date: July 22, 2002

TB

Timothy B. Shirey
Consumer Protection Agent

21

22 Sworn to and subscribed before me
23 this 22nd day of July, 2002.

FILED

AUG 01 2002

M 10:44/nocc
William A. Shaw
Prothonotary

24
25 *Denise J. Powers*
Denise J. Powers
26 Notary Public

27 Notarial Seal
28 Denise J. Powers, Notary Public
 Ebensburg Boro, Cambria County
 My Commission Expires Nov. 18, 2002

1
2 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 PLAINTIFF

No. 02-1131-C.D.

8 v.
9

10 PAUL E. BLOOM, individually, and d/b/a
11 BLOOM'S HOME IMPROVEMENTS

12 PRAECIPE FOR ENTRY OF
13 DEFAULT JUDGMENT WITH
14 WRITTEN CERTIFICATION

15 DEFENDANT

16 **FILED**

17 NOV 22 2002

18 William A. Shaw
19 Prothonotary

20 COUNSEL FOR PLAINTIFF

21 COUNSEL FOR DEFENDANT

22 E. BARRY CREAMY
23 SENIOR DEPUTY ATTORNEY GENERAL
24 ATTORNEY I.D. NO. 39543
25 BUREAU OF CONSUMER PROTECTION
26 EBENSBURG REGIONAL OFFICE
27 171 LOVELL AVENUE, SUITE 202
28 EBENSBURG, PA 15931
29 (814) 471-1831

29 R. DENNING GEARHART, ESQUIRE
30 215 EAST LOCUST STREET
31 CLEARFIELD, PA 16830
32 (814) 765-1581

1
2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 **PLAINTIFF**

No. 02-1131-C.D.

8 v.
9

10 PAUL E. BLOOM, individually, and d/b/a
11 BLOOM'S HOME IMPROVEMENTS

12 **DEFENDANT**

13
14 **PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT**
15 **WITH CERTIFICATION OF WRITTEN NOTICE**

16 TO: William A. Shaw, Prothonotary

17 Please enter judgment by default against Defendant Paul E. Bloom, individually
18 and d/b/a Bloom's Home Improvements pursuant to Pennsylvania Rule of Civil
19 Procedure No. 1511. Certification of Written Notice is attached to this Praecipe.

20 DATE: November 20, 2002

21 Respectfully submitted,

22 
23 E. Barry Creany
24 Senior Deputy Attorney General

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1
2 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 PLAINTIFF

No. 02-1131-C.D.

8 v.
9

10 PAUL E. BLOOM, individually, and d/b/a
11 BLOOM'S HOME IMPROVEMENTS

12 **NOTICE OF INTENT TO TAKE
13 DEFAULT JUDGMENT**

14 DEFENDANT

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23 COUNSEL FOR PLAINTIFF

24 E. BARRY CREAMY
25 SENIOR DEPUTY ATTORNEY GENERAL
26 ATTORNEY I.D. NO. 39543
27 BUREAU OF CONSUMER PROTECTION
28 EBENSBURG REGIONAL OFFICE
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31 (814) 471-1831

24 COUNSEL FOR DEFENDANT

25 R. DENNING GEARHART, ESQUIRE
26 215 EAST LOCUST STREET
27 CLEARFIELD, PA 16830
28 (814) 765-1581

1
2 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 PLAINTIFF

8 v.
9

10 PAUL E. BLOOM, individually, and d/b/a
11 BLOOM'S HOME IMPROVEMENTS

12 DEFENDANT

13 **TO: PAUL E. BLOOM**
14 **R. DENNING GEARHART, ESQUIRE**

15 DATE: November 7, 2002

16 **IMPORTANT NOTICE**

17 YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN
18 APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE
19 COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH
20 AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS
21 NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING
22 AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU
23 SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A
24 LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING
25 OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:
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2 Keystone Legal Services
3 211½ East Locust Street
4 Clearfield, PA 16830
5 (800) 326-9177
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OFFICE OF ATTORNEY GENERAL

E. Barry Creary
E. Barry Creary
Senior Deputy Attorney General
Bureau of Consumer Protection
171 Lovell Avenue, Suite 202
Ebensburg, PA 15931
(814) 471-1831

FILED

BPA
PP 11-47
NOV 22 2002

100
Plaint to ~~Def~~ - & notice served
Notice to ~~Def~~
Notice to

William A. Shaw
Prothonotary

1
2 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 PLAINTIFF

8 v.
9 No. 02-1131-C.D.

10 PAUL E. BLOOM, individually, and d/b/a
11 BLOOM'S HOME IMPROVEMENTS

12 DEFENDANT

13 CERTIFICATION OF WRITTEN NOTICE

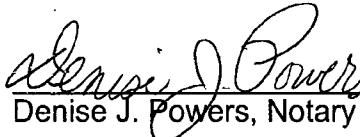
14 I, Janet M. Mulraney, being an adult citizen of the United States and an
15 employee of the Pennsylvania Office of Attorney General, Bureau of Consumer
16 Protection, certify, swear or affirm that true and correct copies of the Commonwealth's
17 Notice of Intent to Take Default Judgment was mailed by Certified Mail, Return Receipt
18 Requested to Counsel for the Defendant, R. Denning Gearhart, Esquire, and Defendant
19 Paul E. Bloom on November 7, 2002. Copies of said notice, cover letter, postal
20 receipts and acknowledgments are attached hereto and labeled Group Exhibit "A".

21 DATE: November 20, 2002


Janet M. Mulraney

22

23 Sworn and subscribed to before
24 me this 20th day of November, 2002.

25 
26 Denise J. Powers, Notary

27

28 Notarial Seal
Denise J. Powers, Notary Public
Ebensburg Boro, Cambria County
My Commission Expires Nov. 18, 2006

Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Commonwealth of Pennsylvania
Plaintiff(s)

No.: 2002-01131-CD

COPY

Real Debt: \$

Atty's Comm:

Vs.

Costs: \$

Int. From:

Paul E. Bloom
Bloom's Home Improvements
Defendant(s)

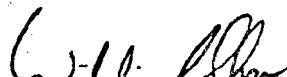
Entry: \$20.00

Instrument: Judgment

Date of Entry: November 22, 2002

Expires: November 22, 2007

Certified from the record this 22nd day of November, 2002



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

1 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

2

3 COMMONWEALTH OF PENNSYLVANIA
4 ACTING BY ATTORNEY GENERAL
4 D. MICHAEL FISHER

7 CIVIL ACTION - EQUITY

5 PLAINTIFF

6 v.
7 No. 02-1131-C.D.

8 PAUL E. BLOOM, individually, and d/b/a
8 BLOOM'S HOME IMPROVEMENTS

9 DEFENDANT

10

11 NOTICE OF ENTRY OF JUDGMENT

12

13 TO: Paul E. Bloom, individually, and d/b/a
14 Bloom's Home Improvements, Defendant

15 You are hereby notified that on Nov. 22, 2002, judgment was entered
16 against you in the above-captioned case.

17

18 DATE: Nov. 22, 2002

19

20 William A. Shaw
21 William A. Shaw, Prothonotary

22

23 I hereby certify that the names and addresses of the proper person to receive
24 this notice is:

25 Mr. Paul Bloom
26 d/b/a Bloom's Home Improvement
27 P.O. Box 344
28 Bigler, PA 16825

25 R. Denning Gearhart, Esquire
26 215 East Locust Street
27 Clearfield, PA 16830

28

29 E. Barry Creary
30 E. Barry Creary
31 Senior Deputy Attorney General

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff :
VS. : NO. 02-1131-CD
: :
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :
Defendant :

CASE NUMBER: 02-1131-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: **MOTION FOR LEAVE TO WITHDRAW AS
COUNSEL FOR DEFENDANT**

FILED ON BEHALF OF: Petitioner, R. Denning Gearhart

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. #26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

FILED

NOV 20 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff :
VS. : NO. 02-1131-CD
: :
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :
Defendant :
:

RULE RETURNABLE

AND NOW THIS 11th day of December, 2002, upon
consideration of the attached Petition, a Rule is hereby issued upon PAUL E. BLOOM, to
Show Cause why the foregoing Motion should not be granted. Rule Returnable the 31
day of December, 2002, at 9:00 o'clock A.m. in Courtroom No. 1
of the Clearfield County Court House, Clearfield, Pennsylvania.

NOTICE

A PETITION OR MOTION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU
WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PETITION
BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND
FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE
MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO
SO THE CASE MAY PROCEED WITHOUT YOU AND AN ORDER MAY BE ENTERED
AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR RELIEF
REQUESTED BY THE PETITIONER OR MOVANT. YOU MAY LOSE RIGHTS
IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT
HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE
SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Second & Market Streets
Clearfield, PA 16830
(814) 765-2641 Ext. 50-51

BY THE COURT,

FILED

DEC 11 2002

William A. Shaw
Prothonotary

FILED

3cc

11/10/02
DEC 11 2002

Atty Geathers
E

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff :
VS. : NO. 02-1131-CD
:
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :
Defendant :

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR DEFENDANT**

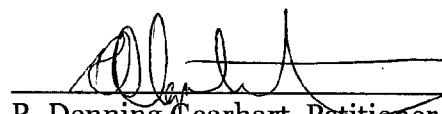
AND NOW, comes R. DENNING GEARHART, who moves your Honorable Court and avers as follows:

1. That your Petitioner had entered his appearance on behalf of the Defendant, Paul E. Bloom.

2. That since that time, the Defendant, Paul E. Bloom, will not return telephone calls and will not cooperate with your Petitioner, therefore, the Petitioner's continued involvement would be a waste of time and money.

WHEREFORE, Petitioner moves your Honorable Court to issue a Rule upon the Defendant to show cause why the Petitioner should not be granted leave to withdraw as counsel.

Respectfully submitted,


R. Denning Gearhart, Petitioner

3cc
Atty Gearhart
01/14/84
20212
NW

William A. Shaw
Prothonotary

R. DENNING GEARHART
ATTORNEY AT LAW
CLEARFIELD, PA. 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff :
:
vs. : No. 02-1131-CD
:
PAUL E. BLOOM, Individually and :
d/b/a BLOOMS'S HOME IMPROVEMENTS, :
Defendant :
:

CASE NUMBER: 02-1131-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: AFFIDAVIT OF MAILING

FILED ON BEHALF OF: R. Denning Gearhart, Esq.

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. #26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

FILED

DEC 31 2002

William A. Shaw
Prothonotary

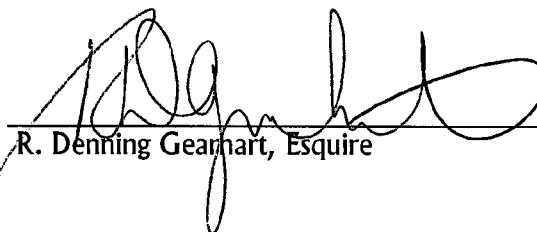
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff : No. 02-1131-CD
vs. :
PAUL E. BLOOM, Individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS, :
Defendant :
:

AFFIDAVIT OF MAILING

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :
:

R. Denning Gearhart, Esquire, the attorney for Plaintiff, being duly sworn according to law, says that he mailed by certified mail, restricted delivery, return receipt requested, a true and correct copy of the Motion to Withdraw as Counsel filed in the above action, to the Defendant, at his place of residence as evidenced by the signed receipt attached hereto as Exhibit 'A'.



R. Denning Gearhart, Esquire

Sworn to and Subscribed

before me this 31 day
of December, 2002.

Kathleen A. Ricotta
Notary Public

NOTARIAL SEAL
KATHLEEN A. RICOTTA, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires June 7, 2005

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Paul E. Bloom
P.O. Box 344
Bigler, PA 16825

2. Article Number
(Transfer from service label)

7001 2510 0003 0263 1005

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Paul E. Bloom Agent Addressee

B. Received by (Printed Name)

Paul Bloom C. Date of Delivery

12-30-01

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1035

FILED
NOV 20 2002
DEC 3 1 2002

William A. Shaw
Prothonotary

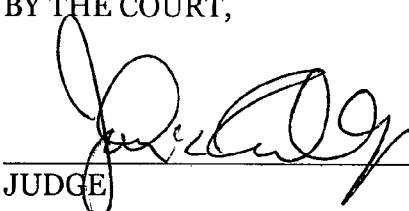
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff :
VS. : NO. 02-1131-CD
: :
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :
Defendant :
:

ORDER

AND NOW, this 31 day of December, 2002, upon consideration of the foregoing Petition for leave to withdraw as counsel, it is the **ORDER** of this Court that this Motion is granted and R. Denning Gearhart is hereby withdrawn as the attorney of record for Defendant, Paul E. Bloom, individually and d/b/a Bloom's Home Improvements.

BY THE COURT,



JUDGE

FILED

JAN 02 2003

William A. Shaw
Prothonotary

FILED

01/07/03
JAN 02 2003

rec Atty Cramy
rec Atty Caschart
rec Def P. Bloom-
William A. Shaw
Prothonotary
P.O. Box 344
Bigler, PA 16825

Shaw



Bureau of Consumer Protection
Ebensburg Regional Office
171 Lovell Ave., Suite 202
Ebensburg, PA 15931
(814) 471-1831
FAX (814) 471-1840

December 17, 2002

R. Denning Gearhart, Esquire
215 East Locust Street
Clearfield, PA 16830

RE: Commonwealth v. Bloom
No. 02-1131-C.D.
Clearfield County

Dear Mr. Gearhart:

I received your Motion to Withdraw as Counsel for Defendant and Rule Returnable giving notice that the above captioned matter has been scheduled for a hearing in Courtroom #1 on December 31, 2002, at 9:00 a.m.

I am writing to advise that the Commonwealth does not oppose your request to withdraw as counsel. I do not intend to appear at that hearing. If it should become necessary to present this letter at the hearing to evidence notice and or the Commonwealth's position, please feel free to do so. In the event the Court would need to contact me to verify this fact, I expect that I will be in the office all day on December 31 at (814) 471-1831.

Please let me know if you should need anything further. Thanks for your courtesy in this matter.

Sincerely,

E. Barry Creany
E. Barry Creany
Senior Deputy Attorney General

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff :
vs. : No. 02-1131-CD
PAUL E. BLOOM, Individually and :
d/b/a BLOOMS'S HOME IMPROVEMENTS, :
Defendant :
:

CASE NUMBER: 02-1131-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: AFFIDAVIT OF MAILING

FILED ON BEHALF OF: R. Denning Gearhart, Esq.

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. #26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

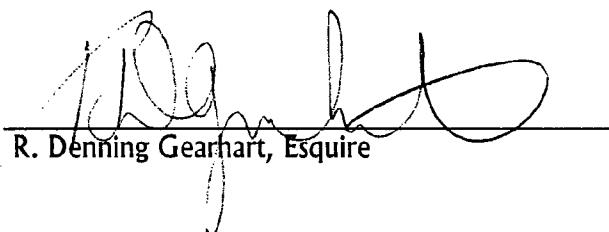
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

COMMONWEALTH OF PENNSYLVANIA :
ACTING BY ATTORNEY GENERAL :
D. MICHAEL FISHER, :
Plaintiff : No. 02-1131-CD
vs. :
PAUL E. BLOOM, Individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS, :
Defendant :
:

AFFIDAVIT OF MAILING

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :
:

R. Denning Gearhart, Esquire, the attorney for Plaintiff, being duly sworn according to law, says that he mailed by certified mail, restricted delivery, return receipt requested, a true and correct copy of the Motion to Withdraw as Counsel filed in the above action, to the Defendant, at his place of residence as evidenced by the signed receipt attached hereto as Exhibit 'A'.



R. Denning Gearhart, Esquire

Sworn to and Subscribed
before me this 31 day
of December, 2002.

Kathleen A. Ricotta
Notary Public

NOTARIAL SEAL
KATHLEEN A. RICOTTA, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires June 7, 2005

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Paul E. Bloom
P.O. Box 3414
Bigler, PA 16825

2. Article Number
(Transfer from service label)

7001 2510 0003 0263 1005

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Paul Bloom Agent Addressee

B. Received by (Printed Name)

Paul Bloom 12-30-01

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1035

CA

1
2 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 PLAINTIFF
8

No. 02-1131-C.D.

9 PAUL E. BLOOM, individually, and d/b/a
10 BLOOM'S HOME IMPROVEMENTS

**MOTION FOR HEARING FOR
ADJUDICATION AND FRAMING
OF DECREE**

11 DEFENDANT
12
13
14
15
16
17

18 **FILED**
19
20
21
22
23

EB 05 2003

William A. Shaw
Notary

24 FOR THE PLAINTIFF

FOR THE DEFENDANT

25 E. BARRY CREAMY
26 SENIOR DEPUTY ATTORNEY GENERAL
27 ATTORNEY I.D. NO. 39543
28 BUREAU OF CONSUMER PROTECTION
EBENSBURG REGIONAL OFFICE
171 LOVELL AVENUE, SUITE 202
EBENSBURG, PA 15931
(814) 471-1831

PAUL E. BLOOM, PRO SE
HYDE TRAILER PARK
LOT #6
BIGLER, PA 16825

1
2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**
3
4

5 COMMONWEALTH OF PENNSYLVANIA
6 ACTING BY ATTORNEY GENERAL
7 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

8 **PLAINTIFF**

9 No. 02-1131-C.D.

10 v.

11 PAUL E. BLOOM, individually, and d/b/a
12 BLOOM'S HOME IMPROVEMENTS

13 **DEFENDANT**

14 **MOTION FOR HEARING FOR ADJUDICATION
15 AND FRAMING OF DECREE**

16 NOW COMES the Commonwealth of Pennsylvania by Attorney General D.
17 Michael Fisher and files the following Motion for a hearing and in support thereof sets
18 forth the following:

- 19 1. The immediate action was brought pursuant to the Pennsylvania Unfair
20 Trade Practices and Consumer Protection Law (hereinafter the
21 "Consumer Protection Law").
- 22 2. In this action the Commonwealth has requested relief in the form of a
23 permanent injunction to prevent future violations of the Consumer
24 Protection Law, restitution for consumers and the payment of civil
25 penalties and costs.
- 26 3. Pursuant to the Plaintiff's Praeclipe for Entry of Default Judgment with
27 Certification of Written Notice, the Clearfield County Prothonotary entered
28 Judgment by Default against the Defendants on November 22, 2002.

1 4. The Judgment by Default entered in this action does not address all the
2 claims for relief requested and specifically does not provide any of the
3 injunctive relief prayed for.
4 5. The Commonwealth believes that it can present testimony and additional
5 evidence which will assist the Court in its adjudication and framing of a
6 final decree.

7 WHEREFORE, the Commonwealth respectfully requests this Honorable Court to
8 schedule a hearing in the above-captioned action in order to assist the Court in its
9 adjudication and framing of a final decree pursuant to Pennsylvania Rule of Civil
10 Procedure No. 1511(b).

11
12 DATE: February 3, 2003

Respectfully submitted,

14 D. MICHAEL FISHER
15 ATTORNEY GENERAL

16 FRANK T. DONAGHUE
17 CHIEF DEPUTY
18 ATTORNEY GENERAL

19 E. BARRY CREAMY
20 SENIOR DEPUTY
21 ATTORNEY GENERAL



22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

4 The undersigned hereby certifies that a true and correct copy of the foregoing
5 Motion for Hearing for Adjudication and Framing of Decree is being forwarded via First
6 Class Mail, postage prepaid this 3rd day of February, 2003, to the following:

Paul E. Bloom
Hyde Trailer Park
Lot #6
Bigler, PA 16825

E. Barry Creany
Senior Deputy Attorney General

E. Barry Crean
Senior Deputy Attorney General

FILED 2cc Any Crim
M 10/30/88
FEB 05 1983
EAST

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

COMMONWEALTH OF PENNSYLVANIA
ACTING BY ATTORNEY GENERAL
D. MICHAEL FISHER

CIVIL ACTION - EQUITY

PLAINTIFF

No. 02-1131-C.D.

PAUL E. BLOOM, individually, and d/b/a
BLOOM'S HOME IMPROVEMENTS

DEFENDANT

ORDER

13 AND NOW, this 11th day of February, 2003, upon Motion filed by the
14 Commonwealth, a hearing for the purpose of receiving testimony and evidence to assist
15 this Court in its adjudication and framing of a final decree pursuant to Pa.R.C.P.
16 1151(b) is hereby set for 1:30P.M. on the 26th day of March, 2003, in
17 Courtroom No. 1.

EDUCATION

FEB 11 2003

William A. Shaw
Prothonotary

1200
1/25/87
FL3 11113
Atty Creary
SAC
William A. Shaw
Prothonotary

1
2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 **PLAINTIFF**

No. 02-1131-C.D.

8 V.
9 PAUL E. BLOOM, individually, and d/b/a
10 BLOOM'S HOME IMPROVEMENTS

AFFIDAVIT OF SERVICE

11 **DEFENDANT**

12
13
14
15
16 **FILED**
17

18 MAR 21 2003

19 *William A. Shaw*
20 *Prothonotary*

21
22 COUNSEL FOR PLAINTIFF

23 E. BARRY CREAMY
24 SENIOR DEPUTY ATTORNEY GENERAL
25 ATTORNEY I.D. NO. 39543
26 BUREAU OF CONSUMER PROTECTION
27 EBENSBURG REGIONAL OFFICE
28 171 LOVELL AVENUE, SUITE 202
 EBENSBURG, PA 15931
 (814) 471-1831

1 IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

2

3 COMMONWEALTH OF PENNSYLVANIA
4 ACTING BY ATTORNEY GENERAL
4 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

5 PLAINTIFF

6 v.

No. 02-1131-C.D.

7 PAUL E. BLOOM, individually, and d/b/a
8 BLOOM'S HOME IMPROVEMENTS

9 DEFENDANT

10 AFFIDAVIT OF SERVICE

11

12 I, Timothy B. Shirey, an adult citizen of the United States and agent for the
13 Commonwealth of Pennsylvania, Office of Attorney General, Bureau of Consumer
14 Protection, do hereby state and affirm that I served a true and correct copy of the Order
15 of Court dated February 11, 2003, scheduling a hearing in the above-captioned matter for
16 1:30 PM on March 26, 2003, upon Paul E. Bloom by hand delivering a copy to him at his
17 residence in Hyde, Clearfield County, Pennsylvania, at 8:02 AM, on Thursday, March 6,
18 2003.

19

20

21

22 
22 _____
22 Timothy B. Shirey
23 Consumer Protection Agent

24

25

26 This statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to
27 unsworn falsification to authorities.

28

FILED

NO
cc

MAR 21 2003

5
RE

William A. Shaw
Prothonotary

COMMONWEALTH OF PENNSLVANIA
ACTING BY ATTORNEY GENERAL
D. MICHAEL FISHER

CIVIL ACTION EQUITY
NO. 02-1131-C.D.

PLAINTIFF

v.

PAUL E. BLOOM, individually, and d/b/a
BLOOM'S HOME IMPROVEMENTS

DEFENDANT

4/2/03

(NOTICE)

I PAUL E. BLOOM DEFENDANT DENY ALL AND ANY ALLEGATIONS
SET FORTH ON CIVIL ACTION -EQUITY NO, 02-1131-C.D.
AND I PAUL E.BLOOM PRAY THE HONORABLE COURT TO DISSMISS
ALL OF ALLEGATIONS AND OR THE HONORABLE COURT TO
ASSIST ME WITH COUNSEL FOR THAT I AM UNABLE TO AFFORD TO
COUNSEL IN ANYWAY, SHAPE OR FORM.

PAUL E. BLOOM



FILED

APR 02 2003

William A. Shaw
Prothonotary

FILED

APR 02 2003
0/10-201m
William A. Shaw
Prothonotary
No court copies

1 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**

2

3 COMMONWEALTH OF PENNSYLVANIA
4 ACTING BY ATTORNEY GENERAL
4 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

5 **PLAINTIFF**

6 v.

7 PAUL E. BLOOM, individually, and d/b/a
8 BLOOM'S HOME IMPROVEMENTS

No. 02-1131-C.D.

FILED

APR 09 2003

9 **DEFENDANT**

10 William A. Shaw
11 Prothonotary

12 **ORDER**

13 AND NOW, this ~~26th~~ <sup>8th ^{April} day of ~~March~~, 2003, upon consideration of the pleadings in this
14 matter and following a hearing pursuant to Pa.R.C.P. No. 1511(b), it is hereby ORDERED,
15 ADJUDGED and DECREED as follows:</sup>

16 1. Defendant Paul E. Bloom is directed to pay Mr. and Mrs. Jerry L. Smith of
17 R.D. 2, Box 176, Morrisdale, Clearfield County, Pennsylvania, restitution totaling Two
18 Thousand Two Hundred Sixty-two and 79/100 Dollars (\$2,262.79).

19 2. Defendant Paul E. Bloom is hereby enjoined from collecting any amounts due
20 on the contracts which he had entered into with Mr. and Mrs. Joseph DeCasper of 1210
21 Daisy Street, Clearfield, Clearfield County, Pennsylvania, and Mr. and Mrs. Supenia of 822
22 Clara Street, Houtzdale, Clearfield County, Pennsylvania.

23 3. Defendant Paul E. Bloom is directed to pay the Commonwealth of
24 Pennsylvania a civil penalty in the amount of Five Thousand and 00/100 Dollars
25 (\$5,000.00) pursuant to §201-8 of the Unfair Trade Practices and Consumer Protection
26 Law.

27 4. Defendant Paul E. Bloom is directed to pay the Commonwealth of
28 Pennsylvania costs in the amount of One Hundred and 00/100 Dollars (\$100.00) pursuant
29 to §201-4.1 of the Unfair Trade Practices and Consumer Protection Law, which represents

1 the filing fee and judgment fee paid in connection with this action.

2 5. The Clearfield County Prothonotary shall enter judgment against Paul E.
3 Bloom in favor of the Commonwealth of Pennsylvania in the amount of Seven Thousand
4 Three Hundred Sixty-two and 79/100 Dollars (\$7,362.79) which represents the total
5 amount Defendant Paul E. Bloom owes for the restitution, civil penalties and costs set forth
6 above.

7 6. Defendant Paul E. Bloom shall begin making monthly payments toward
8 satisfaction of the judgment entered pursuant to this Order in an amount equal to ten
9 percent (10%) of his gross monthly income for the month preceding the payment of the
10 same. All such payments shall be made by the 5th day of the month with Defendant Paul
11 E. Bloom's first payment due on May 5, 2003. With each such monthly payment
12 Defendant Paul E. Bloom shall provide the Commonwealth of Pennsylvania with a
13 statement itemizing all income he has received in the prior month.

14 7. Defendant Paul E. Bloom is permanently enjoined from engaging in trade and
15 commerce within the Commonwealth of Pennsylvania as the provider of home
16 improvement contracting services either individually, through any person acting on his
17 behalf, as a partner in any business entity, or through any corporate or business device
18 until the judgments entered pursuant to this Order have been satisfied by payment in full
19 by Defendant Paul E. Bloom.

20 8. Defendant Paul E. Bloom is hereby permanently enjoined from engaging in
21 any acts, practices or methods of competition which violate the Unfair Trade Practices and
22 Consumer Protection Law.

BY THE COURT.

~~John K. Reilly, P.J.~~

28

FILED

APR 09 2003

Fay

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William A. Shaw
Prothonotary

JUDGEMENT FORTIFIED
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P. Brown

NOTICE TO DEPT.

+

STATEMENT TO COMM.

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

Commonwealth of Pennsylvania

Vs.

No. 2002-01131-CD

Paul E. Bloom Bloom's Home Improvements

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$7362.79 on the April 9, 2003.

William A. Shaw
Prothonotary

William A. Shaw

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Commonwealth of Pennsylvania
Plaintiff(s)

No.: 2002-01131-CD

Real Debt: \$7362.79

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Paul E. Bloom
Bloom's Home Improvements
Defendant(s)

Entry: \$20.00 (Billable)

JUDGMENT ENFORCED AGAINST
Paul E. Bloom ONLY

Instrument: Court Order Judgment

Date of Entry: April 9, 2003

Expires: April 9, 2008

Certified from the record this April 9, 2003

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

1

2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**

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4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7

PETITIONER

NO. 02-1131-C.D.

8

v.

9

PAUL E. BLOOM, individually, and d/b/a
BLOOM'S HOME IMPROVEMENTS

**PETITION FOR RULE
TO SHOW CAUSE WHY
CONTEMPT SANCTIONS
SHOULD NOT ISSUE**

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RESPONDENT

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23 COUNSEL FOR PETITIONER

FILED

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MARGIE A. ANDERSON
DEPUTY ATTORNEY GENERAL
ATTORNEY I.D. NUMBER 79513
OFFICE OF ATTORNEY GENERAL
BUREAU OF CONSUMER PROTECTION
EBENSBURG REGIONAL OFFICE
171 LOVELL AVENUE, SUITE 202
EBENSBURG, PA 15931
(814) 471-1831

JUL 31 2003

William A. Shaw
Prothonotary/Clerk of Courts

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1
2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**
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5 COMMONWEALTH OF PENNSYLVANIA
6 ACTING BY ATTORNEY GENERAL
7 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

8 PETITIONER

9 NO. 02-1131-C.D.

10 v.

11 PAUL E. BLOOM, individually, and d/b/a
12 BLOOM'S HOME IMPROVEMENTS

13 RESPONDENT

14 **NOTICE**

15 YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE
16 CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN
17 TWENTY (20) DAYS AFTER THIS PETITION AND NOTICE ARE SERVED, BY
18 ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING
19 IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS
20 SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE
21 CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED
22 AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY
23 CLAIMED IN THE PETITION OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY
24 THE PETITIONER. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS
25 IMPORTANT TO YOU. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT
26 ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR
27 TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET
28 LEGAL HELP.

Keystone Legal Services
211 ½ East Locust Street
Clearfield, PA 16830

DATE: July 30, 2003

Office of Attorney General

Margie A. Anderson
Margie A. Anderson
Deputy Attorney General

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

COMMONWEALTH OF PENNSYLVANIA
ACTING BY ATTORNEY GENERAL
D. MICHAEL FISHER

CIVIL ACTION - EQUITY

PETITIONER

NO. 02-1131-C.D.

PAUL E. BLOOM, individually, and d/b/a
BLOOM'S HOME IMPROVEMENTS

RESPONDENT

**PETITION FOR RULE TO SHOW CAUSE WHY
CONTEMPT SANCTIONS SHOULD NOT ISSUE**

14 **AND NOW**, this 30th day of July, 2003, comes the Petitioner, the Commonwealth of
15 Pennsylvania, acting by Attorney General D. Michael Fisher, and brings this Petition for
16 Rule to Show Cause Why Contempt Sanctions Should Not Issue against Paul E. Bloom,
17 individually, and d/b/a Bloom's Home Improvement pursuant to §§201-8, 201-9 and 201-
18 9.1 of the Act of December 17, 1968, P.L. 1224, as amended and re-enacted by the Act
19 of November 24, 1976, P.L. 1166, No. 260, and the Act of December 4, 1996, P.L., No.
20 146, 73 P.S. §201-1 *et seq.* (hereinafter referred to as the "Consumer Protection Law"),
21 and in support thereof respectfully represents the following:

1. The Petitioner is the Commonwealth of Pennsylvania, acting by Attorney General D. Michael Fisher, through the Bureau of Consumer Protection, Ebensburg Regional Office (hereinafter referred to as the "Commonwealth"), 171 Lovell Avenue, Suite 202, Ebensburg, Pennsylvania.
2. Respondent Paul E. Bloom is an adult individual whose last known address is P.O Box 344, Bigler, Pennsylvania.

1 participated in all of the actions alleged herein.

4 (A) was directed to make restitution totaling Two Thousand Two
5 Hundred Sixty-two and 79/100 Dollars (\$2,262.79) to Mr. and
6 Mrs. Jerry L. Smith and judgment shall be entered against him
7 in this amount;

8 (B) was enjoined from collecting any amounts due on the contracts
9 which he had entered into with Mr. and Mrs. Joseph DeCasper
10 and Mr. and Mrs. Supenia;

11 (C) was directed to pay the Commonwealth of Pennsylvania a civil
12 penalty in the amount of Five Thousand and 00/100 Dollars
13 (\$5,000.00) and judgment shall be entered against him in this
14 amount;

15 (D) was directed to pay the Commonwealth of Pennsylvania costs
16 in the amount of One Hundred and 00/100 Dollars (\$100.00)
17 and judgment shall be entered against him in this amount:

18 (E) was to begin making monthly payments on May 5, 2003,
19 toward satisfaction of the judgment entered in an amount equal
20 to ten percent (10%) of his gross monthly income for the month
21 preceding the payment of the same and shall include with each
22 payment a statement itemizing all income received in the prior
23 month;

24 (F) was enjoined from engaging in trade and commerce within the
25 Commonwealth of Pennsylvania as the provider of home
26 improvement contracting services until the judgments entered
27 against him have been satisfied in full; and.

28 (G) was permanently enjoined from engaging in any acts, practices

or method which violate the Unfair Trade Practices and Consumer Protection Law.

- 3 5. On April 25, 2003, the Commonwealth provided the Respondent with a copy
- 4 of the Court's Order of April 8, 2003, and a letter outlining his payment
- 5 obligations. This letter informed the Respondent that his first monthly
- 6 installment payment representing the month of April was due by May 5,
- 7 2003, along with a statement itemizing all income that he received for that
- 8 month.
- 9 6. The Respondent did not submit either his payment of ten percent (10%) of
- 10 his gross monthly income for April or a statement itemizing all income that
- 11 he received for that month by May 5, 2003, as required by the Court's Order.
- 12 7. On May 28, 2003, the Commonwealth sent the Respondent a second letter
- 13 stating that his first required payment was not received and requesting that
- 14 he send this initial payment along with his next scheduled payment which
- 15 was due by June 5, 2003. The Respondent failed to send the payments and
- 16 the required statements itemizing all the income received for the months of
- 17 April and May by June 5, 2003.
- 18 8. On June 23, 2003, the Commonwealth sent the Respondent a third letter
- 19 notifying him that his payments for May 5, 2003, and June 5, 2003, were not
- 20 received and requesting that he submit those payments along with his next
- 21 scheduled payment which was due by July 7, 2003. The Respondent again
- 22 failed to send the payments and the required statements itemizing all the
- 23 income received for the months of April, May and June by July 7, 2003.
- 24 9. As of the date of this Petition for Rule to Show Cause Why Contempt
- 25 Sanctions Should Not Issue the Respondent has failed to make any
- 26 payments, send any statements itemizing his income or make any attempt
- 27 to contact the Commonwealth to discuss this matter.
- 28 10. The Commonwealth is informed, believes and therefore avers that the

1 Respondent has willfully violated this Court's Order dated April 8, 2003, by
2 failing to begin making his monthly payments and by failing to provide the
3 Commonwealth with statements itemizing all income he has received.

4 11. Respondent's violations of the Order of April 8, 2003, is sufficient cause to
5 hold the Respondent in contempt of court.

6 12. The Commonwealth believes that the public interest is served by seeking to
7 reopen this proceeding and to hold Respondent Paul E. Bloom in contempt
8 of court and, if necessary, to enforce this Court's Order pursuant to
9 Pa.R.C.P. No. 1529(c) by directing that Respondent Paul E. Bloom be
10 incarcerated until such time as he purges himself of contempt of this Court's
11 Order.

PRAYER FOR RELIEF

14 **WHEREFORE**, the Commonwealth respectfully prays this Honorable Court to issue
15 a Rule upon Respondent Paul E. Bloom: (a) to show cause why the Commonwealth is not
16 entitled to the relief requested herein; (b) to provide the Commonwealth with an accounting
17 of all income he has received from April 1, 2003, to the date of this Rule, supported by all
18 documentation evidencing all income received within this time period; and, (c) to schedule
19 a hearing on said Rule. Further, after a hearing on said Rule, the Commonwealth
20 respectfully prays this Honorable Court to enter an Order:

21 A. Citing Respondent Paul E. Bloom for contempt of court for failure to comply
22 with this Court's Order of April 8, 2003;

23 B. Directing that Respondent Paul E. Bloom be incarcerated until such time that
24 he purges himself of contempt by paying ten percent (10%) of his gross
25 monthly income since the entry of this Court's Order of April 8, 2003;

26 C. Assessing an additional civil penalty of Five Thousand and 00/100 Dollars
27 (\$5,000.00) upon the Respondent for his violations of this Court's Order of
28 April 8, 2003; and,

1 D. Granting any other relief as the Court may deem necessary and appropriate.

2

3 DATE: July 30, 2003

Respectfully submitted,

4

5 D. MICHAEL FISHER
6 ATTORNEY GENERAL

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9 FRANK T. DONAGHUE
10 CHIEF DEPUTY ATTORNEY GENERAL

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12 E. BARRY CREANY
13 SENIOR DEPUTY ATTORNEY GENERAL

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11 Margie A. Anderson
12 MARGIE A. ANDERSON
13 DEPUTY ATTORNEY GENERAL

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4 COMMONWEALTH OF PENNSYLVANIA }
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6 COUNTY OF CAMBRIA }
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8 ss:
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AFFIDAVIT

I, Timothy B. Shirey, being duly sworn according to law, hereby state that I am in excess of eighteen (18) years of age and that I am an Agent for the Office of Attorney General, Bureau of Consumer Protection and that I am authorized to make this affidavit and that the facts set forth in the foregoing Petition for Rule to Show Cause Why Contempt Sanctions Should Not Issue are true and correct to the best of my knowledge, information and belief.

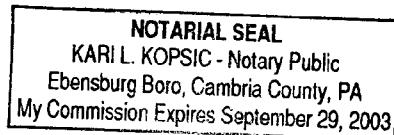
Timothy B. Shirey

Timothy B. Shirey
Agent

18
19 Sworn and subscribed to before me
this 30th day of July, 2003.

20 *Kari L. Kopsic*

21 Kari L. Kopsic, Notary



FILED 2 CC

March 31 2003



Atty Anderson

William A. Shaw
Prothonotary Clerk of Courts

1
2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**
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4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 **PETITIONER**

8
9 NO. 02-1131-C.D.

10 v.
11

12 PAUL E. BLOOM, individually, and d/b/a
13 BLOOM'S HOME IMPROVEMENTS

14 **RESPONDENT**

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16 **RULE UPON RESPONDENT TO SHOW CAUSE WHY**
17 **CONTEMPT SANCTIONS SHOULD NOT ISSUE**

18 AND NOW, this 1st day of Aug, 2003, 2003, upon consideration of the foregoing
19
20 Petition, it is hereby Ordered that:

21
22 (1) A Rule is issued upon the Respondent to show cause why the Petitioner is
23 not entitled to the relief requested; and,
24
25 (2) The Respondent shall within twenty (20) days of this Rule provide to the
26 Commonwealth an accounting of all income received from April 1, 2003, to
27 the date of this Rule, supported by all documentation evidencing all income
28 received within this time period.

29
30 Rule Returnable and a Hearing is scheduled for the 11 day of Sept., 2003, at
31 3:00 P.M. in Courtroom No. 1 of the Clearfield County Courthouse.

32
33 BY THE COURT:
34

35 **FILED**

36 AUG 01 2003

37
38 William A. Shaw
39 Prothonotary/Clerk of Courts

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FILED *acc*
Aug 14 2003 *Atty. Anderson*
AUG 6 12 2003 *E. J. Anderson*
William A. Shaw
Prothonotary/Clerk of Courts

1
2 **IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY**
3

4 COMMONWEALTH OF PENNSYLVANIA
5 ACTING BY ATTORNEY GENERAL
6 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

7 **PETITIONER**

8 NO. 02-1131-C.D.
9

10 v.
11

12 PAUL E. BLOOM, individually, and d/b/a
13 BLOOM'S HOME IMPROVEMENTS

14 **RESPONDENT**
15

16 **CERTIFICATE OF SERVICE**
17 I, Timothy B. Shirey, certify that true and correct copies of the Petition for Rule to
18 Show Cause Why Contempt Sanctions Should Not Issue and the Rule Upon Respondent
19 to Show Cause Why Contempt Sanction Should Not Issue were served upon Paul E.
20 Bloom by hand delivering copies to him at 608 Church Street, Morrisdale, Pennsylvania,
21 on September 9, 2003, at approximately 9:00 A.M.
22

23 DATE: September 9, 2003

Tim S
24 _____
25 Timothy B. Shirey
26 Consumer Protection Agent II
27

28 **FILED**

29 SEP 11 2003

30 William A. Shaw
31 Prothonotary/Clerk of Courts
32

FILED
CO/2:30PM
SEP 11 2003
Atty Creany

William A. Shaw
Prothonotary/Clerk of Courts

FILED

SEP 12 2003

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA, :
ACTING BY ATTORNEY GENERAL :
MICHAEL FISHER :
: VS. : NO. 02-1131-CD
: :
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :

O R D E R

NOW, this 11th day of September, 2003, this being the day and date set for argument on Plaintiff's Petition for Sanctions in the above-captioned matter; following argument and upon consideration thereof, it is the ORDER of this Court that Defendant be and is hereby in Contempt of Court and he is hereby directed to provide his current address to counsel for the Plaintiff this date, and keep Plaintiff advised of any changes thereof in the future until all amounts due are paid in full; that, he submit the names of five (5) employers with whom he has sought employment with the week before to the Department of Probation Services, Adult Division, on every Monday morning at or before 10:00 a.m., and; once employed, submit to a wage attachment and maintain such until any and all amounts due have been paid in full.

BY THE COURT,

President Judge

FILED

2CC Atty E. Barry Creary
01/10/37881
SEP 12 2003 1CC Def. 608 Church St.

William A. Shaw
Prothonotary/Clerk of Courts

E
MS

Morrisdale, PA 16858
(last service address
in file)

COMMONWEALTH OF PENNSYLVANIA
BY ATTORNEY GENERAL
THOMAS W. CORBETT, JR.

Plaintiff

VS.

PAUL E. BLOOM, INDIVIDUALLY AND
D/B/A BLOOM'S HOME
IMPROVEMENTS

Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - EQUITY

NO. 02-1131-C.D.

PETITION FOR CONTEMPT

COUNSEL OF RECORD FOR
PLAINTIFF:

Margie A. Anderson
Deputy Attorney General
Office of Attorney General
Bureau of Consumer Protection
Ebensburg Regional Office
171 Lovell Avenue, Suite 202
Ebensburg, PA 15931
(814) 471-1831
Supreme Court I.D. No. 79513

FILED ^{5CC}
01/14/08 Atty Anderson
MAY 01 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA
BY ATTORNEY GENERAL
THOMAS W. CORBETT, JR.

CIVIL ACTION - EQUITY

Plaintiff

NO. 02-1131-C.D.

VS.

PAUL E. BLOOM, INDIVIDUALLY AND
D/B/A BLOOM'S HOME IMPROVEMENTS

Defendant

PETITION FOR CONTEMPT

The Plaintiff, the Commonwealth of Pennsylvania, by Attorney General Thomas W. Corbett, Jr., brings this Petition for Contempt against Defendant Paul E. Bloom pursuant to § 201-8 and § 201-9.1 of the *Unfair Trade Practices and Consumer Protection Law*, 73 P.S. § 201-1, *et seq.* (hereinafter referred to as the "Consumer Protection Law") and in support thereof respectfully represents the following:

1. Plaintiff is the Commonwealth of Pennsylvania, by Attorney General Thomas W. Corbett, Jr., through the Bureau of Consumer Protection, Ebensburg Regional Office, 171 Lovell Avenue, Suite 202, Ebensburg, Pennsylvania 15931 (hereinafter "Commonwealth").
2. Defendant Paul E. Bloom is an adult individual whose current or last known address is 708 Decater Street, Chester Hill, Clearfield County, Pennsylvania (hereinafter "Defendant").
3. At all times material hereto Defendant has personally participated in all of the actions alleged herein.

BACKGROUND

4. On July 22, 2002, the Commonwealth filed a Complaint in Equity and Petition for Permanent Injunction (hereinafter "Complaint") against the Defendant, who was doing business at that time as Bloom's Home Improvements.
5. The allegations in the Complaint include, but are not limited to, the following violations of the Consumer Protection Law: accepting payments for work to be performed and then failing to fully complete the work, failing to perform home improvement services in a good and workmanlike manner, falsely representing to consumers that he had insurance coverage or other benefits that he did not have; and, failing to provide consumers with notice of their cancellation rights.
6. Judgment by Default was entered against the Defendant and on March 26, 2003, a hearing was held to assist the Court in its adjudication and framing of a final decree.
7. On April 8, 2003, the Court entered an Order providing, *inter alia*, that:
 - A. The Defendant shall pay Mr. and Mrs. Jerry L. Smith restitution totaling Two Thousand Two Hundred Sixty-two and 79/100 Dollars (\$2,262.79);
 - B. The Defendant shall pay the Commonwealth of Pennsylvania civil penalties and costs in the amount of Five Thousand One Hundred and 00/100 Dollars (\$5,100.00);
 - C. Judgment be entered against the Defendant in the amount of Seven Thousand Three Hundred Sixty-two and 79/100 Dollars (\$7,362.79) representing the total amount he owed for consumer restitution, civil penalties and costs;
 - D. The Defendant shall pay on the judgments by making monthly installment payments in an amount equal to ten percent (10%) of

his gross monthly income with his first payment due on May 5, 2003;

- E. The Defendant is permanently enjoined from engaging in trade and commerce within the Commonwealth of Pennsylvania as the provider of home improvement contracting services either individually, through any person acting on his behalf, as a partner in any business entity, or through any corporate or business device until the judgments entered pursuant to this Order have been satisfied by payment in full; and,
- F. The Defendant is hereby permanently enjoined from engaging in any acts, practices or methods of competition which violate the Unfair Trade Practices and Consumer Protection Law.

A copy of this April 8, 2003, Order is attached hereto and labeled Exhibit "A".

- 8. On July 31, 2003, a Petition for Rule to Show Cause Why Contempt Sanctions Should Not Issue (hereinafter "Petition for Rule to Show Cause") was filed against the Defendant for his failure to make payments as provided for in the Court's April 8, 2003, Order.
- 9. A hearing on the Commonwealth's Petition for Rule to Show Cause was scheduled for September 11, 2003, and on that date this Court entered an Order finding the Defendant in Contempt of Court and directing that the Defendant: keep the Commonwealth advised of any changes in his address until all amounts due are paid in full, submit the names of five (5) employers with whom he sought employment with the week before to the Department of Probation Services, Adult Division, every Monday morning; and, once employed, submit to a wage attachment and maintain such until any and all amounts due have been paid in full. A copy of this Order is attached hereto and labeled Exhibit "B".

10. To date the Commonwealth has not received any payments toward the judgments entered pursuant to this Court's April 8, 2003, Order.
11. The Commonwealth made several attempts to collect the amount owed pursuant to the Court's April 8, 2003, Order, including sending letters to the Defendant and contacting the Clearfield County Department of Probation Services to determine whether the Defendant was submitting the names of his prospective employers.
12. The Defendant has not made any payments toward the amounts owed pursuant to the Court's April 8, 2003, Order resulting in Mr. and Mrs. Jerry L. Smith, victims identified in the Commonwealth's original Complaint, never receiving restitution for the Defendant's violations of the Consumer Protection Law.

CURRENT BUSINESS PRACTICES

13. Based upon information received, the Commonwealth believes and, therefore, avers that the Defendant, who is now doing business as Bloom Contracting, not only continues to do business as a home improvement contractor in violation of this Court's April 8, 2003, Order, but also he continues to engage in business practices in violation of the Consumer Protection Law.
14. The Commonwealth is informed, believes and, therefore, avers that the Defendant is advertising home improvement services by displaying signs in Clearfield and Centre Counties including Morrisdale and Phillipsburg.
15. The Commonwealth is informed, believes and, therefore, avers that the Defendant has been advertising home improvement services by leaving his business card at consumers' homes. Attached hereto and labeled Exhibit "C" is a copy of the Defendant's business card.

16. The Commonwealth is informed, believes and, therefore, avers that the Defendant entered into home improvement contracts with David Kylers on July 20, July 24, and August 4, 2007, to perform home improvement services. Copies of these contracts are attached as Group Exhibit "D".

VIOLATIONS OF THIS COURT'S ORDERS

17. The Commonwealth is informed, believes and, therefore, avers that the Defendant has violated § 201-7(b)(1) and (2) of the Consumer Protection Law and paragraph 8 of this Court's April 8, 2003, Order by failing to include the required notice of cancellation in Mr. Kyler's contracts and by not using the notice of cancellation form required to be attached to such contracts.

18. Paragraph 7 of this Court's April 8, 2003, Order provides "Defendant Paul E. Bloom is permanently enjoined from engaging in trade and commerce within the Commonwealth of Pennsylvania as the provider of home improvement contracting services either individually, through any person acting on his behalf, as a partner in any business entity, or through any corporate or business device until the judgments entered pursuant to this Order have been satisfied by payment in full by Defendant Paul E. Bloom."

19. The Commonwealth is informed, believes and, therefore, avers that the Defendant has violated paragraph 7 of this Court's Order dated April 8, 2003, by entering into home improvement contracts with David Kyler.

20. The Commonwealth is informed, believes and, therefore, avers that the Defendant has violated this Court's September 11, 2003, Order by failing to keep the Commonwealth advised of any changes in his address and by failing to submit the names of five (5) employers with whom he has sought employment to the Department of Probation Services, Adult Division, on every Monday morning. Attached as Exhibit "E" is a copy of a letter from the

Clearfield County Department of Probation Services confirming that the Defendant failed to submit employment information every Monday morning.

21. The Defendant's actions display a renewed and blatant disregard for this Court's April 8, 2003, and September 11, 2003, Orders.
22. Further sanctions, including incarceration for indirect criminal contempt, are called for in order to preserve the dignity of this Honorable Court and to provide adequate protection for consumers who have been, and may be, victimized by the Defendant's past actions.

PRAYER FOR RELIEF

WHEREFORE, the Commonwealth respectfully prays this Honorable Court to schedule a hearing on this matter and, after said hearing find the Defendant in contempt of this Court's April 8 and September 11, 2003, Orders, and thereafter:

- A. Cite the Defendant for indirect criminal contempt of court for failure to obey this Court's Orders;
- B. Order the Defendant to undergo incarceration for a period of time to be set by this Court, as may be allowed by law;
- C. If necessary, issue a bench warrant directing the appropriate law enforcement officer to detain the Defendant pending further hearing and to deliver him to said hearing;
- D. Direct the Defendant to pay additional civil penalties in the amount of Five Thousand and 00/100 Dollars (\$5,000.00) per violation due to his willful violations of this Court's Orders, as authorized by § 201-8 of the Consumer Protection Law;
- E. Direct the Defendant to pay all amounts owed to the Commonwealth under the April 8, 2003, Order; and,
- F. Grant any other relief as the Court may deem necessary and appropriate.

DATE: 5/1/08

RESPECTFULLY SUBMITTED,

THOMAS W. CORBETT, JR.
ATTORNEY GENERAL

Margie A. Anderson

MARGIE A. ANDERSON
DEPUTY ATTORNEY GENERAL
SUPREME COURT I.D. NO. 79513

JESSE F. HARVEY
SENIOR DEPUTY ATTORNEY GENERAL
SUPREME COURT I.D. NO. 63435

EXHIBIT “A”

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

3 COMMONWEALTH OF PENNSYLVANIA
ACTING BY ATTORNEY GENERAL
4 D. MICHAEL FISHER

CIVIL ACTION - EQUITY

PLAINTIFF

V.

7 PAUL E. BLOOM, individually, and d/b/a
BLOOM'S HOME IMPROVEMENTS

No. 02-1131-C.D.

I hereby certify this to be a true and attested copy of the original statement filed in this case.

DEFENDANT

APR 09 2003

A. H. G.

6-11-42
Pretermitted/
Clerk of Courts

ORDER

12 AND NOW, this 26th day of ~~March~~^{April}, 2003, upon consideration of the pleadings in this
13 matter and following a hearing pursuant to Pa.R.C.P. No. 1511(b), it is hereby ORDERED,
14 ADJUDGED and DECREED as follows:

15 1. Defendant Paul E. Bloom is directed to pay Mr. and Mrs. Jerry L. Smith of
16 R.D. 2, Box 176, Morrisdale, Clearfield County, Pennsylvania, restitution totaling Two
17 Thousand Two Hundred Sixty-two and 79/100 Dollars (\$2,262.79).

18 2. Defendant Paul E. Bloom is hereby enjoined from collecting any amounts due
19 on the contracts which he had entered into with Mr. and Mrs. Joseph DeCasper of 1210
20 Daisy Street, Clearfield, Clearfield County, Pennsylvania, and Mr. and Mrs. Supenia of 822
21 Clara Street, Houtzdale, Clearfield County, Pennsylvania.

22 3. Defendant Paul E. Bloom is directed to pay the Commonwealth of
23 Pennsylvania a civil penalty in the amount of Five Thousand and 00/100 Dollars
24 (\$5,000.00) pursuant to §201-8 of the Unfair Trade Practices and Consumer Protection
25 Law.

26 4. Defendant Paul E. Bloom is directed to pay the Commonwealth of
27 Pennsylvania costs in the amount of One Hundred and 00/100 Dollars (\$100.00) pursuant
28 to §201-4.1 of the Unfair Trade Practices and Consumer Protection Law, which represents

1 the filing fee and judgment fee paid in connection with this action.

2 5. The Clearfield County Prothonotary shall enter judgment against Paul E.
3 Bloom in favor of the Commonwealth of Pennsylvania in the amount of Seven Thousand
4 Three Hundred Sixty-two and 79/100 Dollars (\$7,362.79) which represents the total
5 amount Defendant Paul E. Bloom owes for the restitution, civil penalties and costs set forth
6 above.

7 6. Defendant Paul E. Bloom shall begin making monthly payments toward
8 satisfaction of the judgment entered pursuant to this Order in an amount equal to ten
9 percent (10%) of his gross monthly income for the month preceding the payment of the
10 same. All such payments shall be made by the 5th day of the month with Defendant Paul
11 E. Bloom's first payment due on May 5, 2003. With each such monthly payment
12 Defendant Paul E. Bloom shall provide the Commonwealth of Pennsylvania with a
13 statement itemizing all income he has received in the prior month.

14 7. Defendant Paul E. Bloom is permanently enjoined from engaging in trade and
15 commerce within the Commonwealth of Pennsylvania as the provider of home
16 improvement contracting services either individually, through any person acting on his
17 behalf, as a partner in any business entity, or through any corporate or business device
18 until the judgments entered pursuant to this Order have been satisfied by payment in full
19 by Defendant Paul E. Bloom.

20 8. Defendant Paul E. Bloom is hereby permanently enjoined from engaging in
21 any acts, practices or methods of competition which violate the Unfair Trade Practices and
22 Consumer Protection Law.

23 By the Court

/s/ John K. Reilly, Jr.

President Judge

EXHIBIT “B”

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

SEP 12 2003

Attest.

Will E. B.
Prothonotary
Pennsylvania
CLEARFIELD COUNTY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA, :
ACTING BY ATTORNEY GENERAL :
MICHAEL FISHER :
VS. : NO. 02-1131-CD
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :

O R D E R

NOW, this 11th day of September, 2003, this being
the day and date set for argument on Plaintiff's Petition for
Sanctions in the above-captioned matter; following argument and
upon consideration thereof, it is the ORDER of this Court that
Defendant be and is hereby in Contempt of Court and he is hereby
directed to provide his current address to counsel for the
Plaintiff this date, and keep Plaintiff advised of any changes
thereof in the future until all amounts due are paid in full;
that, he submit the names of five (5) employers with whom he has
sought employment with the week before to the Department of
Probation Services, Adult Division, on every Monday morning at
or before 10:00 a.m., and; once employed, submit to a wage
attachment and maintain such until any and all amounts due have
been paid in full.

BY THE COURT,

/s/ JOHN K. REILLY, JR.

President Judge

EXHIBIT "C"

BLOOM'S CONTRACTING

Gutters/Spouting
Windows
Roofing/Siding



Soffit/Fascia
Painting
Driveway Sealing

No Job To Small!

FULLY INSURED
FREE ESTIMATES

814-342-3854
814-768-7587

GROUP EXHIBIT "D"

Proposal

Page # 1 of 1 pages

PAUL BLOOM
708 DECASTOR ST
CHESTER HILL PA
16866
(614) 341-2854

Proposal Submitted To	DAVE KYLER	Job Name	1000 M	Job #	Roof
Address		Job Location	< SAME		
Philadelphia Pa 16866		Date	07/10/07	Date of Plans	06/18/07
Phone #		Fax #		Architect	P. Bloom

We hereby submit specifications and estimates for:

TEAR OFF 26 SQ of Shingles,
3 LAYERS put on ice shield and
APPROXIMATELY 16 SQ of 30 year TIMBERLINE
Shingles, color SUNSET BRICK Blend
AND 40 foot of Gutter on
Lower side of House.

Clean up and Hallway
of old Shingles is included
in price

Received check #
for down payment of \$4,000.00
Check M-T

NO 9331300.

We propose hereby to furnish material and labor — complete in accordance with the above specifications for the sum of

\$ SIX THOUSAND DOLLARS \$ 6,000.00 Dollars
with payments to be made as follows: 4000.00 Down & 2000.00 on completion

Any alteration or deviation from above specifications involving extra costs will be
executed only upon written order, and will become an extra charge over and
above the estimate. All agreements contingent upon strikes, accidents, or delays
beyond our control.

Respectfully
submitted

Note — this proposal may be withdrawn by us if not accepted within

days.

Acceptance of Proposal

The above prices, specifications and conditions are satisfactory and are
hereby accepted. You are authorized to do the work as specified.

Payments will be made as outlined above.

Date of Acceptance 07/10/07

Signature

Signature

David Kyler
Paul Bloom

8/4/07

I received from David P. Kylar
\$500.00 to reinforce the
attic ceiling.

Sign K. John Johnson

\$500.00 check made
payable to Paul Brown.

01666 11/1

7/24/07

I Paul Bloom
Received \$2,800. ⁰⁰
For Sheetting House
Roof At 223rd St
Philipsburg Pa.

This is over and
above the contract
For Sheetting Roof
and (or) Siding
From contractor.

Paul Bloom
342-3854

EXHIBIT “E”

Clearfield County Department of Probation Services

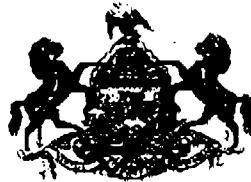
Fredric J. Ammerman
President Judge

Lisa Redden, Supervisor
Adult Division

Paul E. Cherry
Judge

Donald J. McClusick, Director
Collection Division, Suite 232
230 E. Market St.
Clearfield, PA 16830

David M. Patrick, Supervisor
Juvenile Division



Phone (814) 765-2641
FAX (814) 765-1003

Margie A. Anderson
Office of Attorney General
Ebensburg Regional Office

Date: 3/31/04

Dear Ms. Anderson,

In response to our phone conversation of 3-30-04, I am sending this letter in order to confirm that Paul E. Bloom, No. 02-1131-CD, has not complied with the Court Order you sent me. He only called in with employers contacted on one occasion. We have had an active Bench Warrant on him since 4-30-2001 for failure to pay in this office. If I can be of further assistance to you feel free to contact me.

Sincerely,

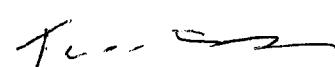
Glenda Knisley
Glenda Knisley
Probation Officer
Collections Division

VERIFICATION

Timothy B. Shirey, states that he is in excess of eighteen (18) years of age and is an Agent for the Commonwealth of Pennsylvania, Office of Attorney General, Bureau of Consumer Protection, the Plaintiff in this action. He verifies that the statements made in the foregoing Petition for Contempt are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. § 4904, relating to unsworn falsification to authorities.

Dated:

5/1/2008



Timothy B. Shirey
Senior Agent

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA
BY ATTORNEY GENERAL
THOMAS W. CORBETT, JR.

CIVIL ACTION - EQUITY

Plaintiff

NO. 02-1131-C.D.

VS.

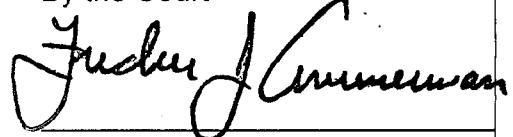
PAUL E. BLOOM, INDIVIDUALLY AND
D/B/A BLOOM'S HOME IMPROVEMENTS

Defendant

ORDER

AND NOW, this 6th day of May, 2008, a hearing on the Petition for
Contempt filed by the Commonwealth of Pennsylvania is hereby set for the 4th day
of June, 2008, in Courtroom 1 of the Clearfield County Courthouse.
⑧ 9:30 AM.

By the Court


J. C. Crammerman

FILED *500*
01/4865X Atty Anderson
MAY 06 2008

William A. Shaw
Prothonotary/Clerk of Courts

FILED

MAY 06 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 5/6/08

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

FILED

MAY 19 2008
M 19:00/um
William A. Shaw
Prothonotary/Clerk of Courts

(CR)

COMMONWEALTH OF PENNSYLVANIA
BY ATTORNEY GENERAL
THOMAS W. CORBETT, JR.

Plaintiff

VS.

PAUL E. BLOOM, INDIVIUDALLY AND
D/B/A BLOOM'S HOME
IMPROVEMENTS

Defendant

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - EQUITY

NO. 02-1131-C.D.

AFFIDAVIT OF SERVICE

**COUNSEL OF RECORD FOR
PLAINTIFF:**

Margie A. Anderson
Deputy Attorney General
Office of Attorney General
Bureau of Consumer Protection
Ebensburg Regional Office
171 Lovell Avenue, Suite 202
Ebensburg, PA 15931
(814) 471-1831
Supreme Court I.D. No. 79513

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA
BY ATTORNEY GENERAL
THOMAS W. CORBETT, JR.

CIVIL ACTION - EQUITY

Plaintiff

NO. 02-1131-C.D.

VS.

PAUL E. BLOOM, INDIVIDUALLY AND
D/B/A BLOOM'S HOME IMPROVEMENTS

Defendant

AFFIDAVIT OF SERVICE

I, Lawrence J. Hoover, an adult citizen of the United States and an agent for the Commonwealth of Pennsylvania, Office of Attorney General, Bureau of Consumer Protection, do hereby state and affirm that I served true and correct copies of the Petition for Contempt and the May 6, 2008, Order upon Paul E. Bloom by hand delivering copies to him at the Country Convenience Store located at 3904 Morrisdale Allport Highway, Morrisdale, Pennsylvania, on Thursday, May 15, 2008, at approximately 10:30 A.M.

Date: May 16, 2008



Lawrence J. Hoover
Senior Agent

This statement is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA }
BY ATTORNEY GENERAL THOMAS W. }
CORBETT, JR. }
VS } NO. 02-1131-CD
PAUL E. BLOOM, INDIVIDUALLY }
AND d/b/a BLOOM'S HOME }
IMPROVEMENTS }

FILED

0 10:35a.m 6/5/2008 2cc Atty Crtney
JUN 05 2008 2cc DEFS -
HYDE PARK

William A. Shaw
Prothonotary/Clerk of Courts
P.O. Box 344
Bicker PA
16825

6/5/2008
P.O. Box 344
Bicker PA
16825

6/5/2008

O R D E R

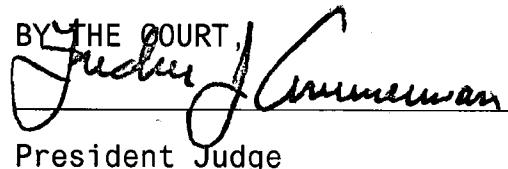
NOW, this 4th day of June, 2008, following hearing on the Commonwealth's Petition for Contempt, it is the finding of this Court that the Defendant is in contempt of the Court's Orders of April 8, 2003 and September 11, 2003 for failing to make any payment whatsoever on the amounts due, failing to report names of employers and reengaging in prohibitive conduct.

It is the further ORDER of this Court that he pay, through the Commonwealth, the amount of Two Thousand Two Hundred Sixty-two Dollars and Seventy-nine Cents (\$2,262.79) as due to Mr. and Mrs. Jerry L. Smith within no more than Ninety (90) Days from this date.

The Court shall hold a further hearing to determine compliance with the payment provisions as set forth above and what, if any, further sanctions should be imposed for contempt with said hearing to be held on Monday, September 15, 2008 at 10:00 a.m. in Courtroom No. 1, Clearfield County

Courthouse, Clearfield, Pennsylvania.

BY THE COURT,



President Judge

FILED

JUN 05 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 6-5-08

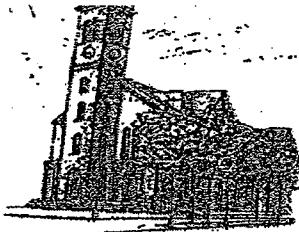
You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

David S. Ammerman
Solicitor

Jacki Kendrick
Deputy Prothonotary

Bonnie H.
Administrati

To: All Concerned Parties
From: William A. Shaw, Prothonotary

It has come to my attention that there is some confusion on court orders over the issue of service. To attempt to clear up this question, from this date forward until further notice, this or a similar memo will be attached to each order, indicating responsibility for service on each order or rule. If you have any questions, please contact me at (814) 765-2641, ext. 1331. Thank you.

Sincerely,



William A. Shaw
Prothonotary

DATE: 6-5-08

You are responsible for serving all appropriate parties.

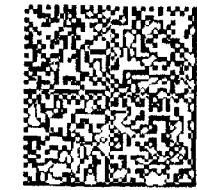
X The Prothonotary's office has provided service to the following parties:

 Plaintiff(s) X Plaintiff(s) Attorney Other

X Defendant(s) Defendant(s) Attorney

 Special Instructions:

WILLIAM A. SHAW
PROTHONOTARY
and CLERK of COURTS
P.O. BOX 549
CLEARFIELD, PENNSYLVANIA 16830



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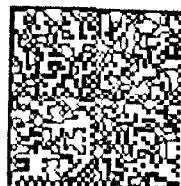
06/05/2008

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Paul E. Bloom
Bloom's Home Improvements
PO Box 344
Bigler, PA 16825



Hasler

US POSTAGE
Mailed From 16830
06/05/2008
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016H16505405

3 FILED
JUN 10 50 am
2008
William A. Shaw
Prothonotary/Clerk of Courts
remailed to 3904 Morrisdale
Airport Highway
Morrisdale PA
16858

UTF

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA }
BY ATTORNEY GENERAL THOMAS W. }
CORBETT, JR. }
VS } NO. 02-1131-CD
PAUL E. BLOOM, INDIVIDUALLY }
AND d/b/a BLOOM'S HOME }
IMPROVEMENTS }

O R D E R

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The Court shall hold a further hearing to determine compliance with the payment provisions as set forth above and what, if any, further sanctions should be imposed for contempt with said hearing to be held on Monday, September 15, 2008 at 10:00 a.m. in Courtroom No. 1, Clearfield County

Courthouse, Clearfield, Pennsylvania.

BY THE COURT

/s/ Fredric J. Ammerman

President Judge

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUN 05 2008

Attest.

William J. Ammerman
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA }
BY ATTORNEY GENERAL THOMAS W. }
CORBETT, JR. }
VS } NO. 02-1131-CD
PAUL E. BLOOM, INDIVIDUALLY }
AND d/b/a BLOOM'S HOME }
IMPROVEMENTS }

O R D E R

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The Court shall hold a further hearing to determine compliance with the payment provisions as set forth above and what, if any, further sanctions should be imposed for contempt with said hearing to be held on Monday, September 15, 2008 at 10:00 a.m. in Courtroom No. 1, Clearfield County

Courthouse, Clearfield, Pennsylvania.

BY THE COURT,
/s/ Fredric J. Ammerman

President Judge

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUN 05 2008

Attest.

William J. Ammerman
Prothonotary/
Clerk of Courts

WILLIAM A. SHAW
PROTHONOTARY
and CLERK of COURTS
P.O. BOX 549
CLEARFIELD, PENNSYLVANIA 16830

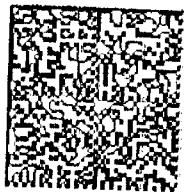
252

Paul E. Bloom
Bloom's Home Improvements
3904 Morrisdale Avenue
Morrisdale, PA 19111-2121

1888-1890

FILED

JUN 18 2008
M 10:30e CW
William A. Shaw
Notary/Clerk of Courts



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RETURN TO SENDER
NO SUCH NUMBER
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IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA }
BY ATTORNEY GENERAL THOMAS W. }
CORBETT, JR. }
VS } NO. 02-1131-CD
PAUL E. BLOOM, INDIVIDUALLY }
AND d/b/a BLOOM'S HOME }
IMPROVEMENTS }

O R D E R

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It is the further ORDER of this Court that he pay, through the Commonwealth, the amount of Two Thousand Two Hundred Sixty-two Dollars and Seventy-nine Cents (\$2,262.79) as due to Mr. and Mrs. Jerry L. Smith within no more than Ninety (90) Days from this date.

The Court shall hold a further hearing to determine compliance with the payment provisions as set forth above and what, if any, further sanctions should be imposed for contempt with said hearing to be held on Monday, September 15, 2008 at 10:00 a.m. in Courtroom No. 1, Clearfield County

Courthouse, Clearfield, Pennsylvania.

BY THE COURT,
/s/ Fredric J. Ammerman

President Judge

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUN 05 2008

Attest.

William J. Ammerman
Prothonotary/
Clerk of Courts

(60)

FILED *2cc*
01/11/09 6:11 AM
SEP 18 2008 2cc Defs-
William A. Shaw
Prothonotary/Clerk of Courts
1023 Apt. B Hill St.
Philipsburg, PA 16866

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA by :
ATTORNEY GENERAL :
THOMAS W. CORBETT, JR. :
VS. : NO. 02-1131-CD
PAUL E. BLOOM, individually and :
d/b/a BLOOM'S HOME IMPROVEMENTS :

O R D E R

AND NOW, this 15th day of September, 2008, following hearing relative the obligations of the Respondent, Paul E. Bloom, to make payment pursuant to this Court's Order of June 4, 2008, the Court notes and orders as follows:

1. The Commonwealth has certified that Mr. Bloom has paid the restitution of Two Thousand Two Hundred Sixty-two Dollars and Seventy-nine (\$2,262.79) Cents in full;

2. It is the further Order of this Court that, effective with the month of October 2008 and continuing thereafter, Mr. Bloom shall forward no less than One Hundred Fifty (\$150.00) Dollars each month to the Commonwealth in order that he is making appropriate monthly payments towards his civil penalty and costs in the total amount of Five Thousand One Hundred (\$5,100.00) Dollars;

3. In order to ensure compliance, it is the further Order of this Court that further hearing be held on the 5th day

of March, 2009, at 1:30 p.m., with fifteen (15) minutes being the estimated length of the hearing;

4. In the event of any failure to make payment by Mr. Bloom, the Attorney General's Office may petition the Court for contempt hearing prior to the March 2009 hearing if the Attorney General's Office wishes to do so;

5. The Respondent shall immediately notify the Attorney General's Office and the Clearfield County Prothonotary's Office in the event that his address should change.

BY THE COURT,

A handwritten signature in black ink, appearing to read "Judge J. Kenneth Klemmer". The signature is fluid and cursive, with "Judge" and "Klemmer" being the most distinct parts.

President Judge

FILED

SEP 18 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 9/18/08

 You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

 Plaintiff(s) Plaintiff(s) Attorney _____ Other _____

Defendant(s) _____ Defendant(s) Attorney _____

_____ Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA by *
ATTORNEY GENERAL THOMAS W. CORBETT, JR. *
vs. *
PAUL E. BLOOM, individually and d/b/a BLOOM'S *
HOME IMPROVEMENTS *
*
*
*

No. 02-1131-CD

O R D E R

AND NOW, this 5th day of March, 2009, the date set for hearing to Ensure
Compliance with the Court's Order of June 4, 2008, the Court canceled the hearing due
to the failure of a representative from the Office of Attorney General being present and
notes that Paul E. Bloom did appear as scheduled.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

FILED

MAR 05 2009
6/4/09/WS
William A. Shaw
Prothonotary/Clerk of Courts
Court to A/C

M. Anderson

DRFT.

DATE: _____

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

FILED

MAR 05 2007

William A. S...
Prothonotary/Clerk of the Court