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15 Attorneys for Plaintiff  
 16 Consumer Financial Protection Bureau

17 **UNITED STATES DISTRICT COURT**  
 18 **CENTRAL DISTRICT OF CALIFORNIA**

19 Consumer Financial Protection Bureau,  
 20 Plaintiff,  
 21 v.  
 22 Morgan Drexen, Inc.,  
 23 and  
 24 Walter Ledda, individually, and as  
 owner, officer, or manager of Morgan  
 25 Drexen, Inc.,  
 26 Defendants.

Case No. SACV13-01267 JLS (JEMx)

**PLAINTIFF'S EX PARTE APPLICATION  
 FOR AN ORDER HOLDING VINCENT  
 HOWARD, HOWARD LAW, PC,  
 WILLIAMSON & HOWARD, LLP,  
 AISSAC AIONO, AND SEILA LAW, LLC,  
 IN CONTEMPT AND IMPOSING  
 MONETARY SANCTIONS**

**HON. JOSEPHINE L. STATON**

**Courtroom 10-A (Santa Ana)**

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1 Pursuant to Local Rule 7-19, Plaintiff, the Consumer Financial Protection  
2 Bureau (“Bureau”), hereby submits this *Ex Parte* Application for an order holding  
3 Vincent Howard, Howard Law, PC, and Williamson & Howard, LLP (collectively,  
4 “the Attorneys”), in contempt and imposing significant monetary sanctions. The  
5 Bureau also seeks an Order holding attorney Aissac Seila Aiono and his law firm,  
6 Seila Law, LLC (“Seila Law”), in contempt for violating the Court’s Orders.

7 As explained in greater detail in the accompanying memorandum in support  
8 of the *Ex Parte* Application, the Attorneys: (a) continue to charge fees to Affected  
9 Consumers<sup>1</sup> despite the Court’s October 9, 2015 Order holding Vincent Howard,  
10 Lawrence Williamson, Howard Law, PC, the Williamson Law Firm, LLC, and  
11 Williamson & Howard, LLP In Contempt (“Contempt Order”)<sup>2</sup>; and (b) are  
12 violating Section IV of the Court’s June 18, 2015 *Order re: Permanent Injunction*  
13 (“Injunction Order”)<sup>3</sup> by sharing information related to Affected Consumers with  
14 Seila Law and others in an effort evade the Court’s Orders.

15 *Ex parte* relief is especially warranted in this instance given that, for the past  
16 five months, the Attorneys, joined by Aiono and Seila Law, have blatantly ignored  
17 the Court’s directives and have continued to violate the rights of consumers  
18 harmed by Morgan Drexen’s debt relief scheme despite an initial contempt holding  
19 by the Court. There is no indication that the Attorneys, Aiono, or Seila Law will  
20 comply with the Court’s Injunction Order or Contempt Order absent immediate  
21 Court action and the issuance of severe coercive and compensatory sanctions. The  
22 Bureau respectfully requests that the Court act immediately to prevent further harm  
23 to consumers.

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26 <sup>1</sup> “Affected Consumer” is a defined term in the Court’s June 18, 2015 *Order re:*  
27 *Permanent Injunction* (Doc 306), and shall have the same meaning here.

28 <sup>2</sup> Doc. 386.

<sup>3</sup> Doc. 306 (June 18, 2015).

1 The Bureau has fulfilled the notice requirements of Local Rule 7-19. Mr.  
2 O'Malley, who is counsel for the Bureau, contacted Sean A. O'Keefe, who is  
3 counsel for the Attorneys, on February 15, 2016, via telephone to inform Mr.  
4 O'Keefe's clients that the Bureau would file this *Ex Parte* Application.<sup>4</sup> Mr.  
5 O'Keefe informed Mr. O'Malley that his clients would oppose the Application.<sup>5</sup>

6 Pursuant to Local Rule 7-19, the name, address, telephone number, and e-  
7 mail address of counsel for the Attorneys are as follows: Sean A. O'Keefe;  
8 O'Keefe & Associates Law Corp., P.C.; 4675 MacArthur Court, Suite 550;  
9 Newport Beach, CA, 92660; 949-334-4135; [sokeefe@okeefelc.com](mailto:sokeefe@okeefelc.com).<sup>6</sup>

10 On February 15, 2016, Mr. O'Malley also contacted Aiono and Seila Law  
11 via telephone to inform them that the Bureau would file this *ex parte* application.<sup>7</sup>  
12 Aiono informed Mr. O'Malley that he and Seila Law did not have counsel but were  
13 in the process of obtaining representation.<sup>8</sup> Aiono stated that counsel would call the  
14 Bureau on February 16, 2016 and stated that the Bureau should discuss its  
15 application with counsel.<sup>9</sup> On February 16, 2016, an attorney named W. Thomas  
16 Gilman called Mr. O'Malley and informed him that he had been in contact with  
17 Aiono, but that Aiono had not retained him.<sup>10</sup> Neither Aiono nor Seila Law has  
18 been in contact with Mr. O'Malley since Aiono referred the Mr. O'Malley to  
19 Gilman.<sup>11</sup>

20 Pursuant to Local Rule 7-19, the name, address, telephone number, and e-  
21 mail address of the only counsel the Bureau is aware of who may represent Aiono  
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23 <sup>4</sup> O'Malley Decl. at ¶ 7 .

24 <sup>5</sup> *Id.*

25 <sup>6</sup> *Id.* at ¶ 8.

26 <sup>7</sup> *Id.* at ¶ 9.

27 <sup>8</sup> *Id.*

28 <sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at ¶ 10.

1 and Seila Law in this matter is as follows: W. Thomas Gilman, Hinkle Law Firm,  
2 301 North Main Street, Suite 2000, Wichita, KS, 67202-4820; 316-267-2000;  
3 [tgilman@hinklaw.com](mailto:tgilman@hinklaw.com).<sup>12</sup>

4 Respectfully submitted,

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6  
7 Dated: February 18, 2016

CARA PETERSEN  
Deputy Enforcement Director for  
Litigation

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9  
10 /s/ R. Gabriel D. O'Malley  
11 R. Gabriel D. O'Malley  
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<sup>12</sup> *Id.*