

legally responsible for the liabilities of Access Funding, Assoc, and En Cor, because it completely dominated their finances, policies and business practices, and because, as such, all three subsidiary entities are its alter egos.

12. Defendant Reliance Funding, LLC is a limited liability company formed immediately after the Office of the Attorney General and the federal Consumer Financial Protection Bureau issued subpoenas or investigative demands to defendant Access Funding, LLC and its corporate affiliates. Reliance Funding is organized under the laws of Maryland and headquartered at 6900 Wisconsin Avenue, Suite 700, Chevy Chase, Maryland 20815. Although purportedly merely the owner of all assets previously owned by defendant Access Holding, LLC, Reliance Funding is in fact a continuation of Access Holding, and, as such, is an alter ego of Access Holding and its subsidiaries, including Access Funding, LLC, Assoc, LLC, and En Cor, LLC. Moreover, Reliance Funding was formed for the purpose of shielding the assets of Access Holding from liabilities associated with potential actions brought by the Office of the Attorney General, the Consumer Financial Protection Bureau, and other creditors.

13. Defendant Lee Jundanian has responsibility for and oversees the day-to-day affairs of defendant Access Funding, LLC and its affiliates, through his roles as managing member of defendants Access Holding, LLC and Reliance Funding, LLC, and, from February 2013 to May 2014, as chief executive officer of Access Funding and Access Holding. Mr. Jundanian, together with his spouse, directly holds a 45% ownership interest in Access Holding, which is the sole owner and alter ego of Access Funding, LLC, Assoc, LLC, and En Cor, LLC. On information and belief, Mr. Jundanian also holds a direct