

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
PADUCAH DIVISION**

DAVID GRIFFIN,

Plaintiff,

V.

**CHARLES A. JONES; SARAH C. JONES;
CA JONES MANAGEMENT
GROUP, LLC; INTEGRATED
COMPUTER SOLUTIONS, INC.;
BLACKROCK INVESTMENTS, LLC;
SE BOOK COMPANY, LLC; and
COLLEGE BOOK RENTAL COMPANY,
LLC,**

Defendants.

Case No. 5:12-cv-00033
JUDGE RUSSELL

JURY DEMAND

**EXPEDITED MOTION TO APPOINT RECEIVER OR, IN THE ALTERNATIVE,
FOR ENTRY OF A PRELIMINARY INJUNCTION**

Plaintiff David Griffin moves the Court, on an expedited basis, to appoint a Kevin Crumbo as Receiver to take control of and oversee the operations of Defendants C.A. Jones Management Group, LLC (“Management”), Integrated Computer Solutions, Inc. (“ICS”), Blackrock Investments, LLC (“BRI”), SE Book Company, LLC (“SEB”), and College Book Rental Company, LLC (“CBR”). Mr. Crumbo’s qualifications and experience are provided herewith.

Plaintiff invested approximately \$30 million in ICS, BRI, SEB and CBR, collectively, since 2008 based on misrepresentations made by Defendants Charles Jones, Sarah Jones and Management and without knowing material information concealed by those defendants. Defendant Charles A. Jones and his company, Management, control the operations and finances of ICS, BRI, SEB and CBR. Under the control of C. Jones and Management, those companies

have paid to Management millions of dollars in undisclosed fees and donated hundreds of thousands of dollars of the companies' money to charities to bolster the Joneses' public image. This all occurred while the Joneses and Management were operating the companies at minimal profit or significant losses and concealing the amount of money the Joneses were taking out of ICS, BRI, SEB and CBR to fund their lavish lifestyle. Unless displaced by a Receiver, Charles Jones, Sarah Jones and Management will continue to waste the assets of those companies to David Griffin's detriment. The Court should appoint Kevin Crumbo of Kraft CPAs as Receiver over Management, ICS, BRI, SEB and CBR to perform the functions described in Plaintiff's Memorandum and the accompanying Proposed Order.

In the alternative, if the Court declines to appoint a Receiver, the Court should enter a preliminary injunction that bars Charles Jones, Sarah Jones, Management, ICS, BRI, SEB and CBR from taking the actions described in Plaintiff's Memorandum.

In support of this Motion, Plaintiff submits and relies on a Memorandum, the supporting exhibits thereto, the Affidavits of David Griffin, Sanford Wexler, Denice Morgan, John Farris and Kevin Crumbo, records obtained from the various Defendants, and the record as it stands in this case.

Respectfully submitted,

/s/ Charles M. Pritchett
Charles M. Pritchett (KBA # 55975)
Tonya J. Austin (KBA # 92268)
FROST BROWN TODD LLC
400 West Market Street
Suite 3200
Louisville, KY 40202

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion has been served via hand delivery, on this the 29th day of February 2012, on the following:

Charles A. Jones
673 Robertson Road
Murray, KY 42071

Sarah C. Jones
673 Robertson Road
Murray, KY 42071

CA Jones Management Group, LLC
c/o Charles A. Jones, Registered Agent
301 Andrus Drive
Murray, KY 42071

David Cox
Harwell Howard Hyne Gabbert &
Manner, P.C.
315 Deaderick Street
Suite 1800
Nashville, TN USA 37238

Integrated Computer Solutions, Inc.
c/o Richard W. Jones, Registered Agent
314 Main Street
Murray, KY 42071

Blackrock Investments, LLC
c/o Richard W. Jones, Registered Agent
314 Main Street
Murray, KY 42071

SE Book Company, LLC
c/o Richard W. Jones, Registered Agent
314 Main Street
Murray, KY 42071

College Book Rental Company, LLC
c/o Richard W. Jones, Registered Agent
314 Main Street
Murray, KY 42071

/s/ Charles M. Pritchett
