

IN THE DUBOIS COUNTY CIRCUIT/SUPERIOR COURT

19D01-2502-MI-000157

CAUSE NO. _____

OFFICE OF THE INDIANA
ATTORNEY GENERAL,

Plaintiff,

v.

GO GO TRAVEL CONSULTING,
LLC,

Defendant.

**ATTORNEY GENERAL
COMPLAINT FOR JUDICIAL
DISSOLUTION**

I. INTRODUCTION

The Plaintiff, the Office of the Indiana Attorney General, brings this action against the Defendant, Go Go Travel Consulting, LLC, for engaging in fraudulent activities and misrepresentations in connection with the entity's corporate formation, as well as its fraudulent sales and leases of foreign timeshares by deception. The Plaintiff seeks to protect the public interest by seeking judicial dissolution of the entity pursuant to Indiana Code § 23-1-47-1.

II. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to Indiana Code § 23-4-47-1 and other relevant statutes, as the Defendant is a domestic limited liability company organized under the laws of Indiana and conducts business within the state.

2. Venue is proper in Dubois County, Indiana, as the Defendant's registered office and agent is listed with the Indiana Secretary of State as John Kucich, One DCB Plaza, Suite 400, Jasper, Indiana 47546.

III. PARTIES

3. The Plaintiff, the Office of the Indiana Attorney General, is responsible for enforcing state laws and protecting the public from fraudulent and deceptive business practices.

4. The Defendant, Go Go Travel Consulting, LLC, is a domestic limited liability company registered in Indiana, with its principal office located at 1 DCB Plz, Jasper, IN 47546.

5. The principals of Go Go Travel Consulting are unknown to Plaintiff. The website of Go Go Travel Consulting < <https://gogotravelconsultingllc.com/>> is hosted by GoDaddy.com, LLC.

IV. FACTUAL ALLEGATIONS

6. In April, 2024, the Defendant, Go Go Travel Consulting, LLC, contacted Scott Jensen and Debra Jensen, residents of Lakeside, Arizona, who were led to believe that the Defendant was a legitimate timeshare broker.

7. Defendant claimed that a Mexican national by the name of Jonathan T. Hernandez, wished to lease their timeshare.

8. Defendant used the name "Mark Hoffman," and a related broker licensing number affiliated with Mark Hoffman, who is a resident of Bloomington, Indiana.

9. The Jensens electronically signed a “Rental Acquisition Proposal” that purported to offer to pay a rental price of \$24,400.00 for five weeks of rental of their timeshare.

10. On May 6, 2024, the Defendant submitted a revised offer for fourteen weeks of rental at a price of \$73,920.00 in order to entice the Jensens into engaging in a fraudulent transaction.

11. On May 10, 2024, the Defendant falsely claimed to have deposited funds into a Fideicomiso account for the benefit of the Jensens, as part of a rental agreement for their timeshare property at Vallarta Gardens Beach Club & Spa Private Residence Club in Mexico.

12. In furtherance of their fraud, Defendant created a false notice from the City of Mexico Secretaria de Turismo acknowledging the transaction.

13. On May 15, 2024, Defendant posed as Fernando Estrada from the Secretaria de Turismo, and made a first request for the Jensens to pay fees associated with the agreement.

14. On May 16, 2024, the Jensens had become suspicious of the transaction and refused to deposit money until the buyer’s funds were deposited. They began to question the validity of the transaction with Defendants agents.

15. On June 6, 2024, Defendant provided a falsified bank transaction receipt, meant to convince the Jensens that the purported lessor had deposited approximately \$130,027.18 in Mexican pesos into escrow.

16. On June 11, 2024, Mr. Jensen requested that Defendant provide photo verification and identification.

17. Defendant's agent impersonating Mark Hoffman then refused to provide photo verification and identification, claiming it was "due to policy of the company" and ironically expressed concerns with identify theft.

18. While the Jensens did not proceed with the transaction, they were misled into entering into agreements and were solicited to make payments to Defendants based on false representations relating to time share lease offers that they then filed as complaints with the Office of the Indiana Attorney General.

19. The Office of the Indiana Attorney General likewise received a complaint from Mark Hoffman, alleging theft of his identity in connection with the transaction after he was contacted by Mr. Jenson alerting him to the attempted fraudulent use of his name and broker number.

20. The phone number listed on the website for Go Go Travel Consulting, (812) 668-7455, is a spoofed VOIP address, registered to the following Mexican nationals:

a. Ricardo Balcazar, Japon 293, Pitillal, Puerto Vallarta, Jalisco, 48290, Mexico.

b. Adrian Valenzuela Breton, Havre 497, Residencial Fluvial, Puerto Vallarta, Jalisco, 48312, Mexico.

21. Defendant is not, and never has been, a tenant at One DCB Plaza, Suite 400, Jasper, Indiana 47546.

22. Defendant is not, and never has been engaged in lawful business in the State of Indiana.

23. Defendant's communications with the Jensen's make it clear that its business registration as well as its unauthorized use of the identity of an Indiana-licensed broker were and likely are still being used in furtherance of its efforts to defraud United States Citizens who have foreign held timeshares:

Mr. & Mrs. Jensen,

In regards to our phone call, below are the links to verify our licenses.

To be able to verify our business license with the secretary of state of Indiana, click on the link below and type in GO GO TRAVEL CONSULTING LLC.

<https://bsd.sos.in.gov/publicbusinesssearch>

To verify my Broker license is the link below, click on the link and type in my name Mark Hoffman or my license number RB14030829

<https://mylicense.in.gov/everification/Search.aspx>

Can you please confirm once you receive my email. If you have any questions or concerns, feel free to contact me.

Best regards,

Mark Hoffman
Legal Department



24. Similarly, in this same county in matter 19D01-2502-PL-000102 a resident of Oregon has made filed claim making substantially similar allegations of fraud and misconduct on the part of the Defendant. That matter claims losses of nearly \$50,000.00 of funds wired to Defendant's agents in furtherance of their fraudulent scheme.

25. Defendant's fraudulent scheme mirrors similar schemes that have been investigated and prosecuted through the U.S. Department of Treasury's

Office of Foreign Assets Control (OFAC), some of which are linked directly to Mexico-based transnational criminal organizations¹.

26. According to the FBI, approximately 6,000 U.S. victims reported losing nearly \$300 million between 2019 and 2023 to timeshare fraud schemes in Mexico, which only counts *reported* losses. Many victims do not report being victimized due to embarrassment or for other reasons.

V. CAUSES OF ACTION

COUNT I: JUDICIAL DISSOLUTION

Ind. Code § 23-1-47-1 et. seq.

27. Plaintiff re-alleges and incorporates by reference the foregoing.

28. Under Indiana law, the Attorney General has authority to seek judicial dissolution of a corporation if it is established that the corporation obtained its articles of incorporation through fraud or has continued to exceed or abuse the authority conferred upon it by law pursuant to Ind. Code § 23-1-47-1.

29. The facts of this complaint make it clear that Defendant Go Go Travel Consulting, LLC is not and has never been a legitimate business formed using the laws of the State of Indiana.

30. Defendant lists its registered agent at an address where it has never maintained an office or employees.

31. Defendant uses its business registration with the Indiana Secretary of State in furtherance of its attempts to defraud U.S. Citizens.

¹ <https://home.treasury.gov/news/press-releases/jy2465>

32. Defendant was formed for the purpose of committing fraud and continues its fraudulent activities.

33. Wherefore, The Plaintiff requests that the Court grant the following relief to Plaintiff:

- a. An order judicially dissolving Go Go Travel Consulting, LLC, pursuant to Indiana Code § 23-4-47-1, due to its fraudulent formation and ongoing commission of fraudulent activities.
- c. An injunction prohibiting the Defendant and its agents from engaging in any further fraudulent or deceptive business practices.
- d. Any other relief the Court deems just and appropriate.

Respectfully submitted,

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By: _____



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