

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.)
THOMAS J. MILLER,)
ATTORNEY GENERAL OF IOWA,)
99AG25112,)

Plaintiff,)

v.)

DAN NELSON AUTOMOTIVE GROUP, INC.)
a South Dakota corporation,)
formerly known as South Dakota Auto Group, Inc.)
d/b/a Dan Nelson Finance Super Center,)
d/b/a J.D. Byrider Sales,)
d/b/a Dan Nelson Auto Network)

SOUTH DAKOTA ACCEPTANCE)
CORPORATION, a South Dakota corporation,)
d/b/a Car Now Acceptance Company,)
d/b/a CNAC)

DANIEL A. NELSON, in his corporate capacity)
and in his individual capacity)

CHRISTIAN J. TAPKEN, in his corporate)
capacity and in his individual capacity)

VICTORY PROPERTIES, LLC)

Defendants.)

EQUITY NO. CE50210

PETITION

IOWA DISTRICT COURT

05 JAN -7 AM 9:04

FILED
POLK COUNTY, IA

The State of Iowa ex rel. Attorney General Thomas J. Miller files this Petition pursuant to the provisions of Iowa Code § 714.16, commonly known as the Iowa Consumer Fraud Act, Iowa Code chapter 537, commonly known as the Iowa Consumer Credit Code (hereinafter "ICCC"), and Iowa Code chapter 706A, commonly known as the Ongoing Criminal Conduct statute, and in support of its claims states as follows.