THIS IS NOT A COMPULSORY ARBITRAT

CASE - This case has been brought by the Commonwealth of Pennsylvania under the Pennsylvania Unfair Trade Practices and Consumer Trade Practices and Consumer Process of the C

Protection Law, 73 P.S. § 201-1, et seq., AN ASSESSMENT OF DAMAGES

HEARING IS REQUIRED

James S. Wise Senior Deputy Attorney General Attorney I.D. #314913 Commonwealth of Pennsylvania Office of Attorney General 1600 Arch Street, Third Floor Philadelphia, Pennsylvania 19103 Tele: 215-560-3684 Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY CIVIL TRIAL DIVISION

COMMONWEALTH OF PENNSYLVANIA	• • • • • • • • •
By Attorney General David W. Sunday, Jr.	:
	:Term, 2025
Plaintiff	: : No.
V.	
*•	•
PHILLY SALVAGE, LLC d/b/a	:
PHILADELPHIA SALVAGE CO. d/b/a	*
PHILADELPHIA SALVAGE	:
632 N. 2nd Street, Box 47	:
Philadelphia, PA 19123	: CIVIL ACTION-EQUITY
k ,	:
and	:
	:
CHRISTOPHER G. STOCK, Individually and as	:
Managing Member of Philly Salvage, LLC	:
632 N. 2nd Street, Box 47	:
Philadelphia, PA 19123	•
1	:
Defendants	•
Detendants	•
	•

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you, and a judgment may be entered against you without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICES SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE
ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY
OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO
FEE.

Lawyer Referral and Information Service Philadelphia Bar Association 1101 Market Street, 11th Floor Philadelphia, PA 19107 (215) 238-6333 PA Bar Association: www.pabar.org

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascentar una comparencia escrita o

en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decider a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SI NO PUEDE CONTRATAR CONTRATAR A UN ABOGADO, ESTA OFICINA PODRÍA LE PROPORCIONARLE INFORMACIÓN SOBRE LAS AGENCIAS QUE PUEDEN OFRECER SERVICIOS LEGALES A PERSONAS ELEGIBLES POR UNA TARIFA REDUCIDA O SIN CARGO.

Asociacion De Licenciados De Philadelphia County
1101 Market Street, 11th Floor
Philadelphia, PA 19107
Teléfono: (215) 238-6333
PA Bar Association: www.pabar.org
Asociacion De Licenciados De Pennsylvania: www.pabar.org

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Office of Attorney General
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Philadelphia, Pennsylvania 19103
Tele: 215-560-3684
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632 N. 2 nd Street, Box 47	:	
Philadelphia, PA 19123	:	
•	:	
Defendants	•	
	:	

COMPLAINT

AND NOW, comes the Commonwealth of Pennsylvania, acting by Attorney General David W. Sunday, Jr. ("Commonwealth" and/or "Plaintiff"), and brings this action on behalf of the Commonwealth pursuant to the provisions of the Pennsylvania *Unfair Trade Practices and Consumer Protection Law*, 73 P.S. § 201-1, et seq., ("Consumer Protection Law"), to restrain by

permanent injunction unfair methods of competition or unfair or deceptive acts or practices in the conduct of any trade or commerce declared unlawful by the Consumer Protection Law.

The Commonwealth believes that the Defendants are willfully using, have willfully used and/or are about to willfully use, the methods, acts, or practices complained of herein. The Commonwealth believes that the public interest is served by seeking a permanent injunction from this Honorable Court to restrain the methods, acts, and practices of the Defendants. The Commonwealth believes that the citizens of the Commonwealth are suffering and will continue to suffer harm unless the acts and practices complained of herein are permanently enjoined.

The Commonwealth also seeks restitution, civil penalties, costs, and other appropriate equitable relief as redress for violations of the Consumer Protection Law, as set forth herein.

In support thereof, the Commonwealth respectfully represents the following:

JURISDICTION

1. This Court has original jurisdiction over this action pursuant to Section 931 of the Judicial Code, 42 Pa. C.S.A. § 931(a).

VENUE

2. Venue lies with this Court pursuant to Pa. R.C.P. 1006(a), (c), and 2179.

THE PARTIES

- 3. Plaintiff is the Commonwealth of Pennsylvania, acting by Attorney General David W. Sunday, Jr., with offices located at 1600 Arch Street, Third Floor, Philadelphia, Pennsylvania 19103.
- 4. Defendant Philly Salvage, LLC d/b/a Philadelphia Salvage Co. d/b/a Philadelphia Salvage ("Philly Salvage" and/or "Defendant") is a registered Limited Liability Company with the Pennsylvania Department of State with a listed address of 542 Carpenter Lane, Philadelphia,

Pennsylvania 19119. Upon information and belief, Defendant Philly Salvage formerly operated from a location of 2104 Berges Street, Philadelphia, Pennsylvania 19125.

5. Defendant Christopher G. Stock ("Stock" and/or "Defendant" and/or collectively as one of the "Defendants" is an adult individual who is/was the Managing Member of Philadelphia Salvage and who has a last-known mailing address of 632 N. 2nd Street, Box 47, Philadelphia, Pennsylvania 19123.

BACKGROUND

- 6. At all times relevant and material hereto, Defendants engaged in trade and commerce in the Commonwealth of Pennsylvania by operating as an antique restoration company that restored heirloom household items such as historic doors, windows, and furniture.

 A true and correct copy of the landing page of Defendants' public Instagram account, captured as of December 8, 2025, is attached hereto and incorporated herein as Exhibit A.
- 7. At all times relevant and material hereto, Defendant Stock approved, endorsed, directed, ratified, controlled and/or otherwise participated in the conduct alleged herein and the practices and operations conducted under the business entity Philly Salvage, LLC.
- 8. The unlawful acts and practices complained of herein were carried out pursuant to Defendant Stock's direction and control, and Defendant Stock directly participated in such unlawful acts and practices.

FACTS

9. In a typical consumer transaction with Defendants, a consumer would reach out to request the restoration of a specific item. The consumer would then provide the item to Defendants and pay an initial deposit, with the contract balance to be due upon completion.

Defendants, in turn, would give the consumer an estimated completion date or timeframe for the restoration.

- 10. In certain instances, Defendants' provision of promised restoration services was significantly delayed and Defendants failed to respond to consumers' requests about their items.
- 11. In certain instances, Defendants notified consumers about the delays in the restoration work due to "COVID and staffing."
- 12. On or about September 10, 2023, Defendants released a statement on their website, www.philadelphiasalvage.com, confirming that it had shuttered its business. A true and correct copy of the September 10, 2023 statement from Defendants' website, captured as of December 8, 2025, is attached hereto and incorporated herein as Exhibit B.
- 13. Although Defendants communicated in the September 10, 2023 statement that they were committed to returning consumers' items, albeit in an unfinished condition, in certain instances, Defendants failed to return consumers' items. *See id*.
- 14. In certain instances where Defendants did not commence or complete the contracted-for restoration work, Defendants failed to refund consumers' deposits.
- 15. The Commonwealth has received a number of consumer complaints against Defendants. The following are examples of what has been alleged in certain complaints submitted by consumers to the Commonwealth:
 - a. On or about September 30, 2021, a Pennsylvania consumer purchased an antique door from Defendants and paid them to have the door stripped and repaired. The consumer paid Defendants a total of \$4,751.50. It was not until long after the consumer filed a complaint with the Bureau that Defendants eventually returned the door, though it was never stripped or repaired. Despite

- failing to provide the contracted-for services, Defendants have not returned any of the monies paid by the consumer for such services.
- b. On or about October 5, 2021, a Pennsylvania consumer contracted with Defendants to complete door restoration work and build a custom sideboard. The consumer paid Defendants a total of \$3,722.50 and was told to expect that the project would be completed in three to four months. Defendants, however, repeatedly delayed completion of the project and never ultimately provided the contracted-for services or provided a refund.
- c. On or about January 26, 2022, a Pennsylvania consumer entered into an agreement with Defendants to pick up, strip, restore, stain, deliver, and reinstall one interior and one exterior door. The consumer paid Defendants a deposit in the amount of \$1,760.00, and Defendants failed to complete the job or provide a refund to the consumer.
- d. In or around December 2021, a Pennsylvania consumer paid Defendants
 \$2,054 for a custom door and related restoration services. Defendants never delivered the door to the consumer and never provided a refund.
- 16. The Commonwealth believes and therefore avers that there may be additional consumers who have not submitted complaints to the Commonwealth and who have also been harmed due to the methods, acts, and practices of Defendants, which include, but are not limited to, those alleged herein.
- 17. The Commonwealth believes that the public interest is served by seeking before this Honorable Court a permanent injunction to restrain the methods, acts, and practices of the Defendants, as herein complained of and as hereinafter set forth. Further, the Commonwealth

requests injunctive relief, restitution, civil penalties, costs, and other appropriate equitable relief as redress for violations of the Consumer Protection Law.

COUNT I – VIOLATIONS OF THE CONSUMER PROTECTION LAW DEFENDANTS FAILED TO DELIVER PRODUCTS AND FAILED TO PROVIDE REFUNDS TO CONSUMERS

- 18. The averments and allegations of the preceding paragraphs are incorporated as though the same were more fully set forth herein.
- 19. In certain instances, Defendants solicited and accepted orders and payments from consumers but subsequently failed to deliver the promised goods and services.
- 20. In certain instances, Defendants returned consumers' goods but failed to complete the agreed-upon restoration work and failed to provide refunds to consumers who paid a deposit or paid in full.
- 21. For example, the consumer whose narrative is described in paragraph 15.A., herein above, purchased an antique door from Defendants and paid them to have the door stripped and repaired. The consumer paid Defendants a total of \$4,751.50. The consumer, however, was subjected to numerous delays from Defendants and, despite failing to provide the contracted-for services, Defendants have not returned any of the monies paid by the consumer for such services.
- 22. The aforesaid methods, acts or practices constitute unfair methods of competition and unfair acts or practices in the conduct of trade or commerce prohibited by Section 201-3 of the Consumer Protection Law, as defined by Section 201-2 of said Law, including, but not limited to, the following:
 - a. Section 201-2(4)(v), representing that goods or services have sponsorship,
 approval, characteristics, ingredients, uses, benefits or quantities that they

- do not have or that a person has sponsorship, approval, status, affiliation or connection that he does not have; and
- b. Section 201-2(4)(xxi), engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding.

 73 P.S. §§ 201-3, and 201-2(4)(v), and (xxi).
- 23. At all times relevant hereto, the unlawful methods, acts and practices complained of have been willfully used by Defendants.
- 24. The Commonwealth believes that the citizens of the Commonwealth are suffering and will continue to suffer harm unless the acts and practices complained of herein are permanently enjoined.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court issue an Order:

- A. Declaring Defendants' conduct, as described herein above, to be in violation of the Consumer Protection Law.
- B. Permanently enjoining Defendants and its officers, agents, employees and all other persons acting on its behalf, directly or indirectly, from violating the Consumer Protection Law and any amendments thereto.
- C. Permanently enjoining Defendants from owning, operating, managing or otherwise controlling a business which markets, advertises or sells goods or services from a location in Pennsylvania and/or to consumers residing within Pennsylvania.
- D. Directing Defendants to make full restitution pursuant to Section 201-4.1 of the Consumer Protection Law to all consumers who have suffered losses as a result of the acts and practices alleged in this complaint and any other acts or practices which violate the Consumer Protection Law.

E. Requiring Defendants to pay the Commonwealth's investigative and litigation costs in this matter.

F. Directing Defendants, pursuant to Section 201-8(b) of the Consumer Protection Law, to pay to the Commonwealth civil penalties of One Thousand and 00/100 Dollars (\$1,000.00) for each violation of the Consumer Protection Law, and Three Thousand and 00/100 Dollars (\$3,000.00) for each violation of the Consumer Protection Law involving consumers aged sixty (60) or older.

G. Requiring Defendants to pay the Commonwealth's costs of its investigation and litigation of this matter, pursuant to Section 1602-U of the Act of April 9, 1929 (P.L. 343), 72 P.S. § 1602-U.

H. Granting such other general, equitable and/or further relief as the Court deems just and proper.

Respectfully Submitted,

COMMONWEALTH OF PENNSYLVANIA OFFICE OF ATTORNEY GENERAL

DAVID W. SUNDAY, JR. ATTORNEY GENERAL

Date: 12/12/25

By:

James S. Wise Senior Deputy Attorney General PA Attorney I.D. #314913 Commonwealth of Pennsylvania Office of Attorney General 1600 Arch Street, Third Floor Philadelphia, Pennsylvania 19103

Telephone: (215) 560-3684 Facsimile: (215) 560 2494

Email: jwise@attorneygeneral.gov



EXHIBIT A



philadelphiasalvage 1 Philadelphia Salvage Co. 12,812 posts 40.9K followers 294 following Shorping & retail By appointment only















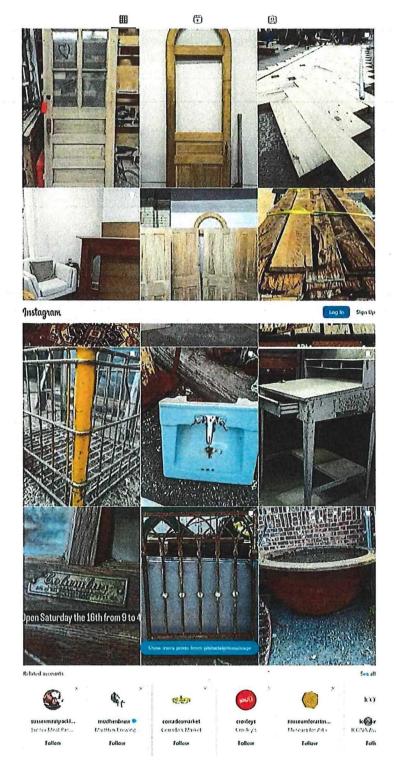


EXHIBIT B



PHILADELPHIA SALVAGE

Closed For Business

Our Statement (0) 10 (1)

Could destroyed the fabric of everything I built over the past decade, from losing staff to the huge financial implications. Philadelphia balvage was able to reopen as an essential business providing skilled services that were certified with the History Commission but the staffing shortage continued to be a challenge. Lit then came in months after responing and surprised us with a notice about the building zoning leaving me 2 months to locate a new space and move a 40 000 sq. It warehouse with years of inventory lumber, and equipment. At while trying to work with the landlord to find a solution to the current building issues. The landlord stated he would not assist with the updates needed for a new sprinkler fire system or the severe, toof issues that needed to be addressed.

PSCo became displaced and had to pivot into 4,000 sq ft of space in the North Last. The move posed a new trail of issues, most of the remaining staff could not commute that far and had to quit, rent was double for a quarter of the space we originally had, we lost all our retail and in person shopping, and had to take up the took of creating our workspace and originary orders back into production with a team Vs. the original size. For the past 6 months we have tired to recuperate from the chaos but have not been able to Philadelphia Salvage has officially gane out of business.

There is still the issue of client projects. We have every intention of returning projects, albeit in their as is condition and stage of development, as many are historic and herdoom pieces. I want to do what's right and return their. While this may not satisfy or make up for our client's inconvenience. I deceptly apologize and pronise this outcome was never my intent on. We will be reaching out to clients through the end of September to pick up or set up deliveries of items.

MPHILADELPHIASALVAGE

f @ in

267.439.6725 NEW BUSINESS NUMBER Contact Us

Privacy Policy

Caroors

C Copyright of PSCo

VERIFICATION

I, Jordon Foley, hereby state that I am a Consumer Protection Agent with the Pennsylvania Office of Attorney General, Bureau of Consumer Protection, and any agreement make this verification on behalf of the Plaintiff in the within action. I hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge or information and belief.

I understand that the statements contained herein are subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Date: 12/10/25

Jordon Foley

Consumer Protection Agent