

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Court No.
)	
)	
JEFFREY M. LUDWIG,)	
)	
<i>Defendant.</i>)	

COMPLAINT

The United States of America, by its attorneys, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, and Christopher R. Donato, Assistant United States Attorney, states as its complaint that:

1. Jurisdiction of this action is conferred on the Court by 28 U.S.C. § 1345.
2. Plaintiff is the United States of America, acting through the U.S. Department of the Treasury's Financial Management Service (hereinafter "FMS"). The debt was referred to FMS on behalf of the U.S. Small Business Administration (hereinafter "SBA"), in accordance with the Debt Collection Improvement Act of 1996. (DCIA) (31 U.S.C. 3701 et seq.)
3. The defendant, Jeffrey M. Ludwig (hereinafter "Ludwig"), resides in the District of Massachusetts in Groveland, MA.

4. On or about January 15, 2003, Ludwig signed a SBA Note and Loan Authorization and Agreement, as President and Clerk of Ludwig's Limousine Service, Inc. (hereinafter "Limousine Service"), to obtain a loan for \$198,600.00. See Exhibits "A and B" attached hereto and incorporated herein.

5. On or about January 15, 2003, Ludwig also signed an SBA Unconditional Guarantee, making him personally liable for the repayment of the loan. See Exhibit "C" attached hereto and incorporated herein.

6. According to SBA records, in January of 2008 Ludwig defaulted on the SBA loan.

7. According to the Commonwealth of Massachusetts, Secretary of State's Office-Corporations Division, on or about November 1, 2006, Limousine Service was voluntarily dissolved. Therefore, Limousine Service is not included as co-defendant in this civil action.

8. In or about December of 2008, SBA referred the debt to FMS for further collections. Between January 2009 and March 2010, FMS pursued collections on behalf of SBA but no further monies were received for their efforts.

9. Ludwig is indebted to the United States in the principal amount of \$175,657.04 plus interest and administrative charges through November 6, 2008, for a total amount of \$265,776.60 as of September 12, 2011. See Exhibit "D" attached hereto and incorporated herein.

10. Ludwig has failed to repay the aforesaid sum although demand has been duly made.

WHEREFORE, the United States demands judgment against Ludwig in the principal amount of \$175,657.04; plus \$22,653.19 interest on this principal accrued through November 6, 2008 and \$67,466.37 in administrative charges. The United States further demands, pursuant to 28 U.S.C. § 1961, that interest on the judgment accrues at the legal rate until paid in full.

Respectfully submitted,

UNITED STATES OF AMERICA
By its attorneys

CARMEN M. ORTIZ
United States Attorney

By:



CHRISTOPHER R. DONATO
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3303

Dated:

10/17/11