

**COMMONWEALTH OF KENTUCKY**  
**FAYETTE CIRCUIT COURT**  
**DIVISION SEVEN**  
**CIVIL ACTION NO. 25-CI-02230**  
*Electronically Filed*

**COMMONWEALTH OF KENTUCKY**

***ex rel.* RUSSELL COLEMAN, ATTORNEY GENERAL**

**PLAINTIFF**

**v.**

**TEMPORARY RESTRAINING ORDER**

**LEXINGTON BLUE, INC., et al.**

**DEFENDANTS**

\*\*\* \*\*

This matter having come before the Court on the Commonwealth's Motion for Temporary Restraining Order, and the Court being otherwise sufficiently advised, the Court hereby **GRANTS** the Commonwealth's Motion and Orders the following:

1. Lexington Blue, Inc., Bradly Pagel, Jr., Alex Southwell, and the Defendants, Lexington Blue Lexington LLC, Lexington Blue Louisville LLC, Lexington Blue Cincinnati LLC, Lexington Blue University LLC, Lexington Blue University, Inc., Lean Dad Development LLC, Wide Awake Consulting, LLC, and The GroundzKeeper LLC (hereinafter "Shell Entities"), and any of their agents, employees, and those acting in active concert or participation with them shall hereafter be enjoined and restrained from doing the following, either directly or indirectly, until further order of this Court:
  - a. Engaging in the construction or roofing business at 287 Pasadena Dr., Lexington, Kentucky or any other location in the Commonwealth. This prohibition includes advertising or soliciting any business related to construction or roofing in Kentucky. This prohibition also includes entering into any new contracts, agreements, or understandings with Kentucky consumers or other businesses with related pending contracts.

- b. Requesting, demanding, or receiving additional money from current customers on current projects; and
- c. Disposing of or concealing any documents or evidence associated with Bradley Pagel Jr. and the Shell Entities.

2. The Kentucky Office of the Attorney General may enter upon the premises of Lexington Blue, located at 287 Pasadena Dr., Lexington, Kentucky 40475 ("Premises") for the following reasons:

- a. Removing, scanning (or copying), and later returning any files related to this action;
- b. Removing, scanning (or copying), and later returning any electronic files and equipment located at the Premises, including the obtaining of passwords and usernames to access electronically stored records whether hosted locally or on a third-party server (such as an email or cloud service);
- c. Taking photographs of any part of the Premises;
- d. Identifying any individuals present at the Premises.

3. Additionally, if the Kentucky Office of the Attorney General becomes aware of other properties associated with the Defendants and the Shell Entities, it may enter upon said premises for the same purposes as described in Paragraph 2 so long as it first provides written notice to the Defendants and the Court prior to doing so.

**ASSET FREEZE**

**IT IS FURTHER ORDERED** that Lexington Blue, Bradly Pagel, Jr., Alex Southwell and the Shell Entities (collectively “Defendants”) are hereby temporarily restrained and enjoined from directly or indirectly:

1. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any funds, real or personal property, accounts, contracts, consumer lists, or any other assets, or any interest therein, wherever located, including outside the United States, that are (1) owned or controlled, directly or indirectly, by any Defendant(s), in whole or in part, or held, in whole or in part for the benefit of any Defendant(s); (2) in the actual or constructive possession of any Defendant(s); or (3) owned, controlled by, or in the actual or constructive possession of any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by, or under common control with any Defendant(s), including, but not limited to, any assets under the name of any Defendant(s) at any bank, savings and loan institution, or bank of any Defendant(s), or with any broker-dealer, escrow agent, title company, commodity trading company, precious metal dealer, or other financial institution or depository of any kind;
2. Opening or causing to be opened any safe deposit boxes titled in the name of any Defendant(s), or subject to access by any Defendant(s);
3. Incurring charges or cash advances on any credit card, debit card, or checking card issued in the name, singly or jointly, of any Defendant(s);
4. Obtaining a personal or secured loan;

5. Incurring liens or encumbrances on real property, personal property or other assets in the name, singly or jointly, of any Defendant(s); and

6. Cashing any checks from consumers, clients, or customers of any Defendant(s).

The assets affected by this Section shall include (a) all assets of the Defendants as of the time this Order is entered.

**IT IS SO ORDERED.**



Judge Diane Minnifield  
Fayette Circuit Court

Date