

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

FEDERAL TRADE COMMISSION, et al.;

Plaintiffs,

vs.

ASSOCIATED COMMUNITY SERVICES,
INC., a Michigan corporation, also d/b/a
A.C. SERVICES, et al.

Defendants.

Case No. 2:21-cv-10174-DML-CI

Judge David M. Lawson

Magistrate Judge Curtis Ivy, Jr.

**STIPULATION RE ORDER
FOR PERMANENT
INJUNCTION AND
MONETARY JUDGMENT
AGAINST ASSOCIATED
COMMUNITY SERVICES,
INC., CENTRAL PROCESSING
SERVICES, LLC, AND
RICHARD “DICK” T. COLE**

Plaintiffs, the Federal Trade Commission (“Commission” or “FTC”) and the Attorneys General of the states of Alabama, California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Missouri, Montana, Nebraska, Nevada,

New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming, and the District of Columbia; the Secretaries of State of Colorado, Georgia, Maryland, North Carolina, and Tennessee; and the Florida Department of Agriculture and Consumer Services and the Utah Division of Consumer Protection (collectively “Plaintiffs”), have filed their Complaint in this matter against Associated Community Services, Inc., Central Processing Services, LLC, Community Services Appeal, LLC, The Dale Corporation, Inc., Directele, Inc., Robert W. “Bill” Burland, Richard T. Cole, Amy J. Burland, Barbara Cole, Scot Stepek, Nikole Gilstorf, Antonio Lia, and John Lucidi. The Complaint sought a permanent injunction and other equitable relief in this matter, pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 53(b) and 57b, Section 6 of the Telemarketing and Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. § 6105, and the unfair and deceptive acts and practices and charitable solicitation laws of the State Plaintiffs. Plaintiffs and Defendants Associated Community Services, Inc., Central Processing Services, LLC, and Richard “Dick” T. Cole stipulate to the entry of a Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS STIPULATED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants Associated Community Services, Inc., Central Processing Services, LLC, Richard “Dick” T. Cole, and others engaged in deceptive acts or practices by making false or misleading claims in charitable solicitations on behalf of numerous nonprofit organizations in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, the state statutes listed below, and Sections 310.3(a)(4), 310.3(b), 310.3(d)(1), (3), and (4) of the Telemarketing Sales Rule (“TSR” or “Rule”), 16 C.F.R. §§ 310.3(a)(4), 310.3(b), and 310.3(d)(1), (3), and (4), and engaged in abusive telemarketing practices by repeatedly or continuously causing a telephone to ring and by delivering prerecorded messages in outbound telephone calls, in violation of Sections 310.4(b)(1)(i) and 310.4(b) of the TSR, 16 C.F.R. §§ 310.4(b)(1)(i) and (b).

STATE STATUTES ALLEGEDLY VIOLATED BY DEFENDANTS	
Alabama	ALA. CODE §§ 8-19-1 through -15; and §§ 13A-9-70 through 76.

California	CAL. BUS. & PROF. CODE §§ 17200 through 17206, and §§ 17510 through 17510.95; CAL. GOV. CODE §§ 12580 through 12599.8.
Colorado	COLO. REV. STAT. §§ 6-1-101 through 115; and §§ 6-16-101 through 114.
Connecticut	CONN. GEN. STAT. §§ 21a-175 through 21a-190l; and §§ 42-110a through 42-110q.
Delaware	DEL. CODE ANN. tit. 6, § 2513(a) (1998); tit. 6, § 2532(a) (1995); and tit. 6, §§ 2595(a) – (b) (1995).
Florida	FLA. STAT. ch. 501, Part II; and ch. 496 (2020).
Georgia	GA. CODE ANN. §§ 10-1-390 through 10-1-408 (2017); and §§ 43-17-1 through 43-17-23 (2016).
Illinois	225 ILL. COMP. STAT. §§ 460/0.01 through 460/23.
Indiana	IND. CODE §§ 24-5-0.5-1 through -12.
Kansas	KAN. STAT. ANN. §§ 17-1759 through 17-1776.
Kentucky	KY. REV. STAT. ANN. §§ 367.110 through 367.993.
Louisiana	LA. REV. STAT. ANN. §§ 51:1401 through 1427; and §§ 51:1901 through 1909.1.
Maine	ME. REV. STAT. ANN. tit. 5, § 207 (2019).
Maryland	MD. CODE ANN., BUS. REG. §§ 6-101 through 6-701 (LexisNexis 2015 and 2020 Suppl.).
Massachusetts	MASS. GEN. LAWS ch. 68 § 32 and ch. 93A § 2.
Michigan	MICH. COMP. LAWS §§ 400.271 through 400.294.
Missouri	MO. REV. STAT. ch. 407.

Montana	MONT. CODE ANN. §§ 30-14-103 and 30-14-111.
Nebraska	NEB. REV. STAT. §§ 21-1901 through 21-19,177; §§ 59-1601 through 59-1622; and §§ 87-301 through 87-306.
Nevada	NEV. REV. STAT. §§ 598.1305, 598.0915(15), 598.096, and 598.0963.
New Hampshire	N.H. REV. STAT. ANN. §§ 7:19; 7:20; 7:21; 7:24; 7:28; 7:28-c; 7:28-f; and 641:8.
New Jersey	N.J. STAT. ANN. §§ 45:17A-18 through 45:17A-40; 56:8-1 through 56:8-226; and N.J. ADMIN. CODE §§ 13:48-1.1 through 13:48-15.1.
New Mexico	N.M. STAT. §§ 57-12-1 through 57-12-22; and §§ 57-22-1 through 57-22-11 (1978).
New York	N.Y. EXEC. LAW §§ 63(12) and 171-a through 175; N.Y. GEN. BUS. LAW § 349; and N.Y. NOT-FOR-PROFIT CORP. LAW § 112.
North Carolina	N.C. GEN. STAT. §§ 75-1.1, 75-102 to 75-104, 131F-20, and 131F-21.
Ohio	OHIO REV. CODE ANN. ch. 1716.
Oklahoma	OKLA. STAT. ANN. tit. 18 §§ 552.1 through 552.22.
Oregon	OR. REV. STAT. §§ 128.886; and 646.605 through 646.636.
Pennsylvania	10 PA. STAT. §§ 162.1 through 162.23.
Tennessee	TENN. CODE ANN. §§ 48-101-501 through 48-101-522.
Texas	TEX. BUS. & COM. CODE ANN. §§ 17.41 through 17.63.

Utah	UTAH CODE ANN. §§13-22-1 through 13-22-23; 13-26-1 through 13-26-11; and 13-11-1 through 13-11-23.
Virginia	VA. CODE ANN. §§ 57-48 through 57-69.
Washington	WASH. REV. CODE §§ 19.86, 19.09, and 80.36.
West Virginia	W.VA. CODE §§ 29-19-1 -15b; and §§ 46A-1-101 through 46A-6-110.
Wisconsin	WIS. STAT. §§ 202.11 through 202.18.
Wyoming	WYO. STAT. ANN. §§ 40-12-101 through 114.

3. Defendants Associated Community Services, Inc., Central Processing Services, LLC, and Richard “Dick” T. Cole neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Stipulation. Only for purposes of this action, Defendants Associated Community Services, Inc., Central Processing Services, LLC, and Richard “Dick” T. Cole admit the facts necessary to establish jurisdiction.

4. Defendants Associated Community Services, Inc., Central Processing Services, LLC, and Richard “Dick” T. Cole waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of the Order, and agree to bear their own costs and attorney fees.

5. Defendants Associated Community Services, Inc., Central Processing Services, LLC, and Richard “Dick” T. Cole waive all rights to appeal or otherwise challenge or contest the validity of the Order.

6. Entry of the Order is in the Public Interest.

DEFINITIONS

For the purpose of this Stipulation, the following definitions apply:

A. **“Settling Defendants”** means individual defendant Richard “Dick” T. Cole (“Defendant Dick Cole”) and the corporate defendants Associated Community Services, Inc. (“Defendant ACS”), also d/b/a A.C. Services, and Central Processing Services, LLC (“Defendant CPS”).

B. **“ACS Corporate Defendants”** means Defendant ACS and Defendant CPS.

C. **“Defendants”** means Associated Community Services, Inc., also d/b/a A.C. Services; Central Processing Services, LLC; Community Services Appeal, LLC; The Dale Corporation, Inc.; Directele, Inc.; Robert W. “Bill” Burland; Richard “Dick” T. Cole; Amy J. Burland; Barbara Cole; John Lucidi; Nikole Gilstorf (a/k/a Nikole Luton and/or Nikole Dicks); Antonio “Tony” Lia; and Scot Stepek.

D. **“Plaintiffs”** means the Commission and the State Plaintiffs (including each state), individually, collectively, or in any combination

E. **“State Plaintiffs”** means the Attorneys General of the states of Alabama, California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming, and the District of Columbia; the Secretaries of State of Colorado, Georgia, Maryland, North Carolina, and Tennessee; and the Florida Department of Agriculture and Consumer Services and the Utah Division of Consumer Protection.

F. **“Contribution”** means any donation or gift of money or any other thing of value.

G. **“Donor”** means any Person solicited to make a Contribution.

H. **“Fundraising”** means a plan, program, or campaign that is conducted to induce Contributions by mail, telephone, electronic mail, social media, or any other means.

I. **“Fundraising Services”** means providing assistance in Fundraising, directly or indirectly, including by advising, assisting, acting as a broker, independent contractor or fundraising consultant, investing, planning, supplying or arranging for the supply of contact or Donor lists, arranging for any Person to affiliate with any Person for the purpose of Fundraising, or providing or arranging for the provision of marketing services (e.g., creating or advising on solicitation materials), printing, customer service, caging, escrow, payment processing, mail processing, or fulfillment services in connection with Fundraising.

J. **“Person”** means any individual, group, organization, unincorporated association, limited or general partnership, corporation, or other legal entity.

K. **“Telemarketing”** means any plan, program, or campaign that is conducted to induce the purchase of goods or services or to solicit a Contribution, by use of one or more telephones and which involves a telephone call, whether or not covered by the Telemarketing Sales Rule.

STIPULATION

I. BAN ON FUNDRAISING

IT IS STIPULATED that the ACS Corporate Defendants and Defendant Dick Cole are permanently restrained and enjoined from Fundraising or providing

Fundraising Services to any Person, whether directly or indirectly. This includes controlling, directly or indirectly, or holding an ownership interest in, any entity engaged in Fundraising or the provision of Fundraising Services.

II. BAN ON TELEMARKETING

IT IS FURTHER STIPULATED that the ACS Corporate Defendants and Defendant Dick Cole are permanently restrained and enjoined from engaging in, or assisting others to engage in, Telemarketing, whether acting directly or through an intermediary, including by consulting, brokering, planning, investing, or advising. *Provided, however,* that this Section does not prohibit Defendant Dick Cole, individually (including as an employee of another Person) or through any business either of them owns or operates, from initiating any Manually Dialed Call when such a call is not part of a plan, program, or campaign to induce the sale of a good or service or solicit a Contribution through a telephone call and is only incidental to the business. For purposes of this provision, “Manually Dialed Call” means a telephone call that is dialed by an individual who manually selects the telephone number to be called without the assistance of an automated dialer or similar device and without the use of any prerecorded message. *Provided, further,* that it is not a violation of the Order for the Defendant Dick Cole to own a non-controlling stock

interest in a publicly traded company that engages in conduct banned in this Section II.

III. PROHIBITION AGAINST MISREPRESENTATIONS

IT IS FURTHER STIPULATED that the ACS Corporate Defendants and Defendant Dick Cole, the officers, agents, and employees of the ACS Corporate Defendants and Defendant Dick Cole, and all other Persons in active concert or participation with any of them, who receive actual notice of the Order, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, selling, or distribution of any good or service are permanently restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication, any material fact.

IV. COMPLIANCE WITH STATE LAW

IT IS FURTHER STIPULATED that the ACS Corporate Defendants and Defendant Dick Cole, the officers, agents, and employees of the ACS Corporate Defendants and Defendant Dick Cole, and all other Persons in active concert or participation with any of them, who receive actual notice of the Order, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, selling, or distribution of any good or service are

permanently restrained and enjoined from violating, causing others to violate, or assisting others in violating any provision of the following state laws:

Alabama	ALA. CODE §§ 8-19-1 through -15; and §§ 13A-9-70 through 76.
California	CAL. BUS. & PROF. CODE §§ 17200 through 17206, and §§ 17510 through 17510.95; CAL. GOV. CODE §§ 12580 through 12599.8.
Colorado	COLO. REV. STAT. §§ 6-1-101 through 115; and §§ 6-16-101 through 114.
Connecticut	CONN. GEN. STAT. §§ 21a-175 through 21a-190l; and §§ 42-110a through 42-110q.
Delaware	DEL. CODE ANN. tit. 6, § 2513(a) (1998); tit. 6, § 2532(a) (1995); and tit. 6, §§ 2595(a) – (b) (1995).
Florida	FLA. STAT. ch. 501, Part II; and ch. 496 (2020).
Georgia	GA. CODE ANN. §§ 10-1-390 through 10-1-408 (2017); and §§ 43-17-1 through 43-17-23 (2016).
Illinois	225 ILL. COMP. STAT. §§ 460/0.01 through 460/23.
Indiana	IND. CODE §§ 24-5-0.5-1 through -12.
Iowa	IOWA CODE § 714.16.
Kansas	KAN. STAT. ANN. §§ 17-1759 through 17-1776.
Kentucky	KY. REV. STAT. ANN. §§ 367.110 through 367.993.
Louisiana	LA. REV. STAT. ANN. §§ 51:1401 through 1427; and §§ 51:1901 through 1909.1.

Maine	ME. REV. STAT. ANN. tit. 5, § 207 and tit. 10, § 1499-A (2019).
Maryland	MD. CODE ANN., BUS. REG. §§ 6-101 through 6-701 (LexisNexis 2015 and 2020 Suppl.).
Massachusetts	MASS. GEN. LAWS ch. 68 § 32 and ch. 93A § 2.
Michigan	MICH. COMP. LAWS §§ 400.271 through 400.294.
Missouri	MO. REV. STAT. ch. 407.
Montana	MONT. CODE ANN. §§ 30-14-103 and 30-14-111.
Nebraska	NEB. REV. STAT. §§ 21-1901 through 21-19,177; §§ 59-1601 through 59-1622; and §§ 87-301 through 87-306.
Nevada	NEV. REV. STAT. §§ 598.1305, 598.0915(15), 598.096, and 598.0963.
New Hampshire	N.H. REV. STAT. ANN. §§ 7:19; 7:20; 7:21; 7:24; 7:28; 7:28-c; 7:28-f; and 641:8.
New Jersey	N.J. STAT. ANN. §§ 45:17A-18 through 45:17A-40; 56:8-1 through 56:8-226; and N.J. ADMIN. CODE §§ 13:48-1.1 through 13:48-15.1.
New Mexico	N.M. STAT. §§ 57-12-1 through 57-12-22; and §§ 57-22-1 through 57-22-11 (1978).
New York	N.Y. EXEC. LAW §§ 63(12) and 171-a through 175; N.Y. GEN. BUS. LAW § 349; and N.Y. NOT-FOR-PROFIT CORP. LAW § 112.
North Carolina	N.C. GEN. STAT. §§ 75-14, 75-15.1, and 131F-1 to 131F-33.
Ohio	OHIO REV. CODE ANN. ch. 1716.
Oklahoma	OKLA. STAT. ANN. tit. 18 §§ 552.1 through 552.22.

Oregon	OR. REV. STAT. §§ 128.886; and 646.605 through 646.636.
Pennsylvania	10 PA. CONS. STAT. §§ 162.1 through 162.23 (1990).
Tennessee	TENN. CODE ANN. §§ 48-101-501 through 48-101-522.
Texas	TEX. BUS. & COM. CODE ANN. §§ 17.41 through 17.63.
Utah	UTAH CODE ANN. §§13-22-1 through 13-22-23; 13-26-1 through 13-26-11; and 13-11-1 through 13-11-23.
Virginia	VA. CODE ANN. §§ 57-48 through 57-69.
Washington	WASH. REV. CODE §§ 19.86, 19.09, and 80.36.
West Virginia	W.VA. CODE §§ 29-19-1 -15b; and §§ 46A-1-101 through 46A-6-110.
Wisconsin	WIS. STAT. §§ 202.11 through 202.18.
Wyoming	WYO. STAT. ANN. §§ 40-12-101 through 114.

V. COOPERATION

IT IS FURTHER STIPULATED that the ACS Corporate Defendants and Defendant Dick Cole shall cooperate fully with Plaintiffs' representatives in this case, including in any investigation into any Defendant's compliance with the Order, and in any investigation related to or associated with the transactions, occurrences, or Persons that are the subject of the Complaint. The ACS Corporate Defendants and Defendant Dick Cole must provide truthful and complete information, evidence, and testimony. The ACS Corporate Defendants and

Defendant Dick Cole must appear for interviews, discovery, hearings, trials, and any other proceedings that any Plaintiff's representative may reasonably request upon seven days' written notice, or other reasonable notice, at such places and times as each Plaintiff's representative may designate, without the service of a subpoena.

VI. DONOR INFORMATION

IT IS FURTHER STIPULATED that the ACS Corporate Defendants and Defendant Dick Cole, the officers, agents, and employees of the ACS Corporate Defendants and Defendant Dick Cole, and all other Persons in active concert or participation with any of them, who receive actual notice of the Order, are permanently restrained and enjoined from directly or indirectly:

A. Disclosing, using, or benefitting from any information about any Donor solicited by Defendants, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a Donor's account (including a credit card, bank account, or other financial account), that any Defendant obtained prior to entry of the Order;

B. Failing to destroy such Donor information in all forms in their possession, custody, or control within 10 days after entry of the Order; and

C. Failing to provide a sworn statement certifying they have destroyed such Donor information in all forms in their possession, custody, or control within 15 days after entry of the Order.

Provided, however, that Donor information need not be disposed of, and may be disclosed, to the extent requested by a government agency or required by law, regulation, or court order.

VII. MONETARY JUDGMENT AND PARTIAL SUSPENSION

IT IS FURTHER STIPULATED that judgment is hereby entered against the ACS Corporate Defendants and Defendant Dick Cole as follows:

A. Judgment in the amount of One Hundred Ten Million Sixty-Three Thousand Eight Hundred Forty-Three Dollars and no cents (\$110,063,843.00) is entered in favor of Plaintiffs against the ACS Corporate Defendants and Defendant Dick Cole, jointly and severally, as equitable monetary relief.

B. The judgment is suspended as to all Settling Defendants, subject to Paragraphs VII.D and VII.E.

C. Plaintiffs' agreement to the suspension of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of the Settling

Defendants' sworn financial statements and related documents (collectively referred to as "Financial Representations") submitted to the Plaintiffs, namely:

1. The financial statement of Defendant ACS, executed on March 10, 2020;
2. The financial statement of Defendant CPS, executed on March 10, 2020;
3. The financial statement of Defendant Richard "Dick" T. Cole, executed on March 10, 2020;
4. The sworn declaration of Defendant Richard "Dick" T. Cole, executed on October 23, 2020; and
5. Supplemental attachments to the March 10, 2020 financial statements, including bank statements and tax returns, produced by the Settling Defendants' undersigned counsel to the Commission on March 10, 2020; April 13, 2020; April 14, 2020; and May 29, 2020.

D. The suspension of the judgment will be lifted as to a Settling Defendant if, upon motion by any Plaintiff, the Court finds that the Settling

Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the Financial Representations identified above.

E. If the suspension of the judgment is lifted as to one or more Settling Defendants, the judgment becomes immediately due as to that Settling Defendant(s) in the amount specified in Paragraph VII.A (which the parties stipulate only for purposes of this Section represents the consumer injury that the Complaint alleges was caused by Associated Community Services, Inc., Central Processing Services, LLC, and Community Services Appeal, LLC, and for which the Settling Defendants are jointly and severally liable), less any payment previously made by Associated Community Services, Inc.; Central Processing Services, LLC; Community Services Appeal, LLC, Robert W, “Bill” Burland, Richard “Dick” T. Cole, Amy J. Burland, Barbara Cole, Nikole Gilstorf (a/k/a Nikole Luton and/or Nikole Dicks); Antonio “Tony” Lia; John Lucidi, or Scot Stepek pursuant to any other order entered in connection with this matter, plus interest computed from the date of entry of the Order. Payments on the judgment shall be paid to the Florida Department of Legal Affairs Escrow Fund (“Florida Escrow Fund”) if the Court has not approved one or more charities to receive the Contribution pursuant to Paragraph VII.F. Such payments shall be made by wire transfer, cashier’s check, or other certified funds

made payable to the Florida Department of Legal Affairs Escrow Fund. If the Court has approved one or more charities to receive a Contribution pursuant to Paragraph VII.F, then any such payments shall be made to the approved charities.

F. The State Plaintiffs shall identify one or more charities to recommend to this Court as suitable to receive a Contribution. Within ninety days of the receipt of any funds by the Florida Escrow Fund pursuant to the Order, the State Plaintiffs shall submit to this Court a motion and proposed order recommending one or more recipients for the Contribution, the amount to be paid to any approved recipient, and the manner and timeframe for such payment. Any monies paid by Settling Defendants and held in the Florida Escrow Fund shall be distributed only as authorized and directed by this Court. The Settling Defendants shall have no right to challenge any recommendations regarding any Contribution or monetary distribution made by the State Plaintiffs.

VIII. ADDITIONAL MONETARY PROVISIONS

IT IS FURTHER STIPULATED that:

A. Settling Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to the Order and may not seek the return of any assets.

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil or administrative litigation by or on behalf of any Plaintiff with any of the Settling Defendants in a proceeding to enforce the right to any payment or monetary judgment pursuant to the Order, such as a nondischargeability complaint in any bankruptcy case.

C. The facts alleged in the Complaint establish all elements necessary to sustain an action by any Plaintiff pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and the Order will have collateral estoppel effect for such purposes.

D. Defendant Dick Cole acknowledges that his Social Security Number, which he previously submitted to Plaintiffs, may be used for collecting and reporting on any delinquent amount arising out of the Order, in accordance with 31 U.S.C. §7701.

IX. ORDER ACKNOWLEDGMENTS

IT IS FURTHER STIPULATED that the Settling Defendants obtain acknowledgments of receipt of the Order:

A. The ACS Corporate Defendants and Defendant Dick Cole, within seven days of entry of the Order, each must submit to Plaintiff Federal Trade Commission an acknowledgment of receipt of the Order sworn under penalty of perjury.

B. For ten years after entry of the Order, Defendant Dick Cole, for any business that he, individually or collectively with any other Defendant named in this matter, is the majority owner or controls directly or indirectly, and each ACS Corporate Defendant must deliver a copy of the Order to: (1) all principals, officers, directors, and LLC managers and members and (2) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within seven days of entry of the Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which the Settling Defendants delivered a copy of the Order, the Settling Defendants must obtain, within thirty days, a signed and dated acknowledgment of receipt of the Order.

X. COMPLIANCE REPORTING

IT IS FURTHER STIPULATED that the Settling Defendants make timely submissions to the Federal Trade Commission and, on behalf of the State Plaintiffs, the Office of the Michigan Attorney General:

A. One year after entry of the Order, each Settling Defendant must submit a compliance report, sworn under penalty of perjury:

1. The Settling Defendants each must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with each of them; (b) identify all of their businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, or sales, and the involvement of any other Defendant (which the ACS Corporate Defendants and Defendant Dick Cole must describe if they know or should know due to

their own involvement); (d) describe in detail whether and how they are in compliance with each Section of the Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to the Order, unless previously submitted to the Federal Trade Commission and the Office of the Michigan Attorney General.

2. Additionally, Defendant Dick Cole must: (a) identify all telephone numbers and all physical, postal, email and Internet addresses, including all residences; (b) identify all business activities, including any business for which he performs services whether as an employee or otherwise and any entity in he has any ownership interest; and (c) describe in detail his involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

B. For ten years after entry of the Order, the Settling Defendants each must submit a compliance notice, sworn under penalty of perjury, within fourteen days of any change in the following:

1. Settling Defendants each must report any change in: (a) any designated point of contact; or (b) the structure of the ACS Corporate Defendants or any entity that either the ACS Corporate Defendants or

Defendant Dick Cole have any ownership interest in or control directly or indirectly that may affect compliance obligations arising under the Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to the Order.

2. Additionally, Defendant Dick Cole must report any change in:

- (a) name, including aliases or fictitious name, or residence address; or
- (b) title or role in any business activity, including any business for which he performs services whether as an employee or otherwise and any entity in which he has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.

C. The Settling Defendants each must submit to the Commission and to the Office of the Michigan Attorney General notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against him or her within 14 days of its filing.

D. Any submission required by the Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under the laws of the United States

of America that the foregoing is true and correct. Executed on: _____” and supplying the date, signatory’s full name, title (if applicable), and signature.

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to the Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:

Associate Director for Enforcement,
Bureau of Consumer Protection,
Federal Trade Commission,
600 Pennsylvania Avenue NW
Washington, DC 20580

The subject line must begin: FTC, et al. v. Associated Community Services, Inc., et al., Case No. _____.

F. Unless otherwise directed by a representative of the Office of the Michigan Attorney General in writing, all submissions to the Office of the Michigan Attorney General pursuant to the Order must be must be emailed to AG-COD@michigan.gov or sent to:

Michigan Department of Attorney General
Corporate Oversight Division
PO Box 30736
Lansing, MI 48909

The subject line must begin: FTC, et al. v. Associated Community Services, Inc., et al. Case No. _____.

G. The Settling Defendants expressly consent to the sharing of any and all documents submitted as part of their compliance reporting to any Plaintiff with all other Plaintiffs.

XI. RECORDKEEPING

IT IS FURTHER STIPULATED that the Settling Defendants must create certain records for 10 years after entry of the Order, and retain each such record for 5 years. Specifically, the ACS Corporate Defendants, and Defendant Dick Cole for any business that, individually or collectively with any other Defendants, he is a majority owner or controls directly or indirectly, must create and retain the following records:

A. Accounting records showing the revenues from all goods or services sold;

B. Personnel records showing, for each individual providing services, whether as an employee or otherwise, that individual's name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;

C. Records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response;

D. All records necessary to demonstrate full compliance with each provision of the Order, including all submissions to the Commission and to the Office of the Michigan Attorney General; and

E. A copy of each unique advertisement or other marketing material.

XII. COMPLIANCE MONITORING

IT IS FURTHER STIPULATED that, for the purpose of monitoring the Settling Defendants' compliance with the Order, and any failure to transfer any assets as required by the Order:

A. Within fourteen days of receipt of a written request from a representative of any Plaintiff, the Settling Defendants must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. Each Plaintiff is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69. Nothing in the Order limits any Plaintiff's lawful demand for documents or other evidence pursuant to applicable law.

B. For matters concerning the Order, each Plaintiff is authorized to communicate directly with the Settling Defendants. Settling Defendants must permit representatives of any Plaintiff to interview any employee or other individual affiliated with either the ACS Corporate Defendants or Defendant Dick Cole who has agreed to such an interview. The individual interviewed may have counsel present.

C. Any Plaintiff may use all other lawful means, including posing, through its representatives as consumers, donors, suppliers, or other individuals or entities, to the Settling Defendants or any individual or entity affiliated with the Settling Defendants, without the necessity of identification or prior notice. Nothing in the Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1, nor limits State Plaintiffs' lawful use of relevant state laws governing pre-suit investigation and discovery.

D. Upon written request from a representative of any Plaintiff, any consumer reporting agency must furnish consumer reports concerning Defendant Dick Cole, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)(1).

XIII. STATE COURT ENFORCEMENT

IT IS FURTHER STIPULATED that, without limiting any other provisions of the Order, each State Plaintiff shall have the authority to enforce or seek sanctions for violations of Sections I – IV, VI, and XII of the Order independently in a court of general jurisdiction in its state, if that State Plaintiff has reason to believe that Persons in its state have been or will be affected. No approval from any other Plaintiff is required. Settling Defendants consent to any such state court’s jurisdiction for purposes of enforcing the terms of Sections I – IV, VI, and XII of the Order.

XIV. RETENTION OF JURISDICTION

IT IS FURTHER STIPULATED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of the Order.

STIPULATIONS FOLLOW

SO STIPULATED AND AGREED:

FOR DEFENDANTS ACS, CPS, AND RICHARD "DICK" T. COLE:

September 14, 2020

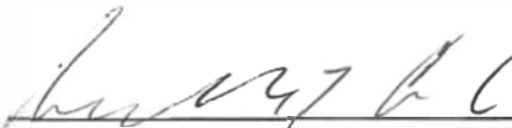


Steven M. Wernikoff
Honigman LLP
155 North Wacker Drive
Chicago, IL 60606
Email: swernikoff@honigman.com
Telephone: (312) 701-9380

Mark C. Pierce
Pierce, Farrell, Tafelski & Wells PLC
2525 S. Telegraph Road, Suite 100
Bloomfield Hills, MI 48302
Email: mpierce@pft-law.com
Telephone: (248) 451-2200

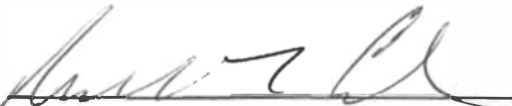
Attorneys for Defendants Associated
Community Services, Inc.; Central
Processing Services, LLC; and Richard
"Dick" T. Cole

September 14, 2020



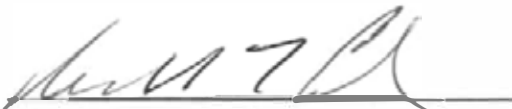
Richard "Dick" T. Cole, President
For Associated Community Services, Inc.

September 14, 2020



Richard "Dick" T. Cole, Manager
For Central Processing Services, LLC

September 14, 2020



Richard "Dick" T. Cole
On behalf of himself, individually

FOR THE FEDERAL TRADE COMMISSION:

March 1, 2021

By: /s/ Tracy S. Thorleifson

Local Counsel for the
Federal Trade Commission
Pursuant to Local Rule 83.20(g):

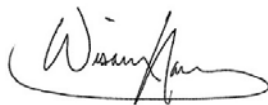
SAIMA MOHSIN
Acting United States Attorney
KEVIN R. ERSKINE
Assistant United States Attorney
Eastern District of Michigan
211 W. Fort Street, Suite 2001
Detroit, MI 48226
Phone (313) 226-9610

Charles A. Harwood
Regional Director
Tracy S. Thorleifson
Colin D. A. MacDonald
Sarah A. Shifley
Federal Trade Commission
915 2nd Ave., Suite 2896
Seattle, WA 98174
Email: tthorleifson@ftc.gov
cmacdonald@ftc.gov
sshifley@ftc.gov
Telephone: (206) 220-6350
Attorneys for Plaintiff Federal Trade
Commission

FOR THE STATE OF MICHIGAN

February 26, 2021

By:



Wisam E. Naoum
Assistant Attorney General
Michigan Department of Attorney General
P.O. Box 30736
Lansing, MI 48909
(557) 335-7632
NaoumW1@michigan.gov
MI P83335

**FOR JENA GRISWOLD, COLORADO
SECRETARY OF STATE**

February 25, 2021

By: *s/ with the consent of Diane R. Hazel*

DIANE R. HAZEL*

First Assistant Attorney General
Consumer Protection Section
Colorado Attorney General's Office
1300 Broadway, 7th Floor
Denver, Colorado 80203
Phone: (720) 508-6231
Email: diane.hazel@coag.gov
CO Bar No. 42954

**Counsel of Record*

LEEANN MORRILL

First Assistant Attorney General
State Services Section
Colorado Attorney General's Office
1300 Broadway, 6th Floor
Denver, Colorado 80203
Phone: (720) 508-6159
Email: leeann.morrill@coag.gov
CO Bar No. 38742

**PHILIP J. WEISER, ATTORNEY GENERAL
FOR THE STATE OF COLORADO**

Dated: February 25, 2021

By: s/ with consent of Diane R. Hazel

Diane R. Hazel
First Assistant Attorney General
Colorado Attorney General's Office
1300 Broadway, 7th Floor
Denver, CO 80203
(720) 508-6231
CO Bar No. 42954
diane.hazel@coag.gov

Olivia D. Webster
Acting First Assistant Attorney General
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, Colorado 80203
Phone: (720) 508-6203
Email: libby.webster@coag.gov
CO Bar No. 35867

FOR THE STATE OF DELAWARE

March 3rd, 2021

By: /s/ with consent of Oliver J. Cleary

Oliver J. Cleary
Deputy Attorney General
Delaware Department of Justice
820 N. French Street, 5th Floor
Wilmington, DE 19801
(302) 577-8369
Oliver.Cleary@Delaware.gov
DE #5830

**FOR THE STATE OF GEORGIA AND THE
GEORGIA SECRETARY OF STATE**

February 22, 2021

By: /s/ with the consent of Roger A. Chalmers
ROGER A. CHALMERS
Senior Assistant Attorney General
GA Bar No. 118720
DANIEL S. WALSH
Senior Assistant Attorney General
GA Bar No. 735040
Department of Law
State of Georgia
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
(404) 458-3220
rchalmers@law.ga.gov
dwalsh@law.ga.gov

FOR THE STATE OF ILLINOIS



January 19, 2021

By: Barry S. Goldberg
BARRY S. GOLDBERG – IL Bar No. 6269821
KRISTIN C. LOUIS – IL Bar No. 6255714
Assistant Attorneys General
Office of the Attorney General Kwame Raoul
Charitable Trust Bureau
100 West Randolph Street, 11th Floor
Chicago, Illinois 60601-3175
Telephone: (312) 814-2595
Email: bgoldberg@atg.state.il.us
Email: klouis@atg.state.il.us

FOR THE STATE OF KANSAS

February 11, 2021

By: /s/ with the consent of Kathleen Barceleau

Kathleen Barceleau

Assistant Attorney General

Office of the Kansas Attorney General

120 S.W. 10th Avenue, Ste. 300

Topeka, KS 66612-1597


(785) 296-2215

kathleen.barceleau@ag.ks.gov

MI #83169

FOR THE STATE OF LOUISIANA

Dec. 4th, 2020

By: 
Cathryn E. Gits *
Assistant Attorney General
Office of Attorney General Jeff Landry
1885 N. Third Street
Baton Rouge, LA 70802
225-326-6400
gitsc@ag.louisiana.gov
La. Bar Roll Number:35144

FOR THE STATE OF NEW JERSEY

February 23, 2021


By: s/ with consent of Monisha A. Kumar
Monisha A. Kumar
Deputy Attorney General

State of New Jersey
Office of the Attorney General
Division of Law
124 Halsey Street – 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
(973) 648-3070
Monisha.Kumar@law.njoag.gov
NJ Attorney No. 900212012

FOR THE STATE OF NEW YORK

LETTITIA JAMES, ATTORNEY GENERAL OF
THE STATE OF NEW YORK

February 24, 2021

By: 
Peggy J. Farber)
Assistant Attorney General
New York State Attorney General's Office
Charities Bureau
28 Liberty Street, 19th Floor
New York, New York 10005
(212) 416-8785
Peggy.Farber@ag.ny.gov
NY 4342655

FOR THE STATE OF OREGON

February 17
_____, 2021

By: Brian Marshall
Brian Simmonds Marshall
Heather L. Weigler
Senior Assistant Attorneys General
Oregon Department of Justice
100 SW Market Street, 4th Floor
Portland, Oregon 97201
(971) 673-1880
Brian.S.Marshall@doj.state.or.us
Oregon State Bar No. 196129

FOR THE STATE OF TEXAS

February 11, 2021

By: 

Scot M. Graydon,

Assistant Attorney General

Office of Attorney General of Texas

P.O. Box 12548

Capitol Station

Austin, Texas 78711-2548

(512) 463-2120

scot.graydon@oag.texas.gov

Texas Bar No. 24002175

**FOR THE COMMONWEALTH OF
VIRGINIA, *EX REL.* MARK R. HERRING,
ATTORNEY GENERAL**

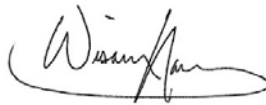
March 3rd, 2021

By: /s/ with consent of Mark S. Kubiak
Mark S. Kubiak
Stephen J. Sovinsky
Assistant Attorneys General
Office of Attorney General of Virginia
202 North 9th Street
Richmond, VA 23219
(804) 786-7364
mkubiak@oag.state.va.us
VA 73119

**FOR THE STATES OF ALABAMA,
CALIFORNIA, CONNECTICUT, FLORIDA,
INDIANA, IOWA, KENTUCKY, MAINE,
MARYLAND, MASSACHUSETTS,
MISSOURI, MONTANA, NEBRASKA,
NEVADA, NEW HAMPSHIRE, NEW
MEXICO, NORTH CAROLINA, OHIO,
OKLAHOMA, PENNSYLVANIA,
TENNESSEE, UTAH, WASHINGTON, WEST
VIRGINIA, WISCONSIN, AND WYOMING,
THE FLORIDA DEPARTMENT OF
AGRICULTURE AND CONSUMER
SERVICES, THE SECRETARIES OF STATE
OF MARYLAND, NORTH CAROLINA, AND
TENNESSEE, THE DIVISION OF
CONSUMER PROTECTION OF THE UTAH
DEPARTMENT OF COMMERCE, AND THE
DISTRICT OF COLUMBIA**

February 26, 2021

By:



Wisam E. Naoum
Assistant Attorney General
Michigan Department of Attorney General
P.O. Box 30736
Lansing, MI 48909
(557) 335-7632
NaoumW1@michigan.gov
MI P83335

FOR THE STATE OF ALABAMA

February 10, 2021

By: 

Olivia W. Martin *

Assistant Attorney General

Office of Attorney General

501 Washington Avenue

Montgomery, Alabama 36104

(334) 242-7335

Olivia.Martin@AlabamaAG.gov

AL ASB-9038-R780

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE ATTORNEY GENERAL OF THE
STATE OF CALIFORNIA**

February 10, 2021

By: 

David K. Eldan*

Deputy Attorney General
Charitable Trusts Section
Office of the Attorney General
Department of Justice
State of California
300 S. Spring St., Suite 1702
Los Angeles CA 90013
(213) 269-6041
David.Eldan@doj.ca.gov
CA 163592

*Attorney not admitted in this District, co-signing
pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF CONNECTICUT

February 25, 2021

By: _____



Kimberly Carlson McGee
Assistant Attorney General
Office of Attorney General
165 Capitol Avenue
Hartford, CT 06106
(860) 808-5400
Kim.mcgee@ct.gov
CT juris no. 440655

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE STATE OF FLORIDA
ASHLEY MOODY
Attorney General**

February 11, 2021

By:



Ellen Annaliese Bullock *
Assistant Attorney General




Victoria Ann Butler *
Director of Consumer Protection
Donna Cecilia Valin
Orlando Bureau Chief
Office of Attorney General
State of Florida
Department of Legal Affairs
Consumer Protection Division
135 W. Central Blvd., Suite 1000
Orlando, FL 32801
(407) 316-4840
Ellen.Bullock@myfloridalegal.com
FBN 102980
Donna.Valin@myfloridalegal.com
FBN 96687
Victoria.Butler@myfloridalegal.com
FBN 861250

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF INDIANA

February 17, 2021

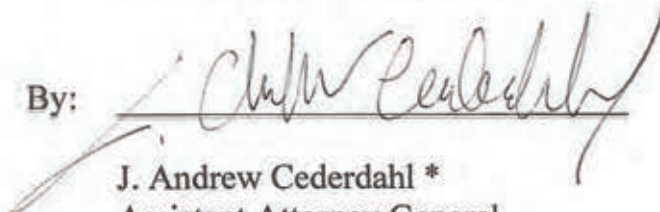

By:
Tamara Weaver *
Deputy Attorney General
Office of the Indiana Attorney General
Indiana Government Center South – 5th Fl.
302 W. Washington Street
Indianapolis, IN 46204
(317) 234-7122
Tamara.Weaver@atg.in.gov
IN 28494-64

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF IOWA

February 10, 2021

By:

A handwritten signature in black ink, appearing to read "J. Andrew Cederdahl", is written over a horizontal line. The signature is fluid and cursive.

J. Andrew Cederdahl *
Assistant Attorney General
Office of the Attorney General of Iowa
1305 E. Walnut St.
Des Moines, Iowa 50319
(515) 281-5926
Andrew.Cederdahl@ag.iowa.gov
IA AT0012249

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE COMMONWEALTH OF
KENTUCKY**

February 24, 2021

By:



Rebecca Price

Assistant Attorney General

Kentucky Office of the Attorney General

Consumer Protection Division

1024 Capital Center Drive, Suite 200

Frankfort, Kentucky 40601

(502) 696-5300

Rebecca.price@ky.gov

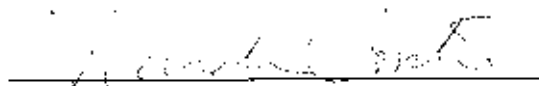
KY Bar # 9312

* Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF MAINE

February 18, 2021

By:


Linda Conti*

Assistant Attorney General

Office of Attorney General of Maine

6 State House Station

Augusta, Maine 04333-0006

207-626-8800

linda.conti@maine.gov

ME Bar No. 3638

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF MARYLAND

February 24, 2021

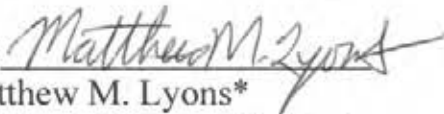
BRIAN E. FROSH
Attorney General of Maryland

By: *Josaphine B. Yuzuik*
JOSAPHINE B. YUZUIK *
Assistant Attorney General
Office of the Attorney General
Office of the Secretary of State
16 Francis Street
Annapolis, Maryland 21401
(410) 260-3855
josaphine.yuzuik@maryland.gov

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE COMMONWEALTH
OF MASSACHUSETTS**

February 10, 2021

By: 
Matthew M. Lyons*

Assistant Attorney General
Non-Profit Organizations/
Public Charities Division
Office of Attorney General Maura Healey
One Ashburton Place, 18th Floor
Boston, MA 02108
(617) 727-2200
matthew.lyons@mass.gov
MA BBO No. 657685

*Attorney not admitted in this District, co-signing
pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF MISSOURI

February 24, 2021

By: Michelle Hinkl
Michelle Hinkl*
Assistant Attorney General
Missouri Attorney General's Office
815 Olive Street, Suite 200
St. Louis, Missouri 63101
(314) 340-7961
Michelle.Hinkl@ago.mo.gov
MO bar #64494

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF MONTANA

February 24, 2021

By: 

MARK MATTIOLI *

Chief, Office of Consumer Protection

Office of Attorney General Austin Knudsen

P.O. Box 200151

Helena, MT 59620-0151

(406) 444-4500


mmattioli@mt.gov

MT #2927

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF NEBRASKA

February 23, 2021

By: 
Jocelyn J. Brasher*
Assistant Attorney General
Office of Attorney General Douglas J. Peterson
2115 State Capitol
Lincoln, NE 68509-8920
(402) 471-2693
jocelyn.brasher@nebraska.gov
NE, #26011

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF NEVADA

February 11, 2021

By:



Laura M. Tucker *

Senior Deputy Attorney General
Office of the Nevada Attorney General
Bureau of Consumer Protection
8945 W. Russell Road, Suite 204
Las Vegas, NV 89148
(702) 486-6525
LMTucker@ag.nv.gov
NV Bar #13268

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE STATE OF NEW
HAMPSHIRE**

February 12, 2021

By:



Thomas J. Donovan*
Director of Charitable Trusts
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301
(603)271-3658
attorneygeneral@doj.nh.gov
NH Bar # 664

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF NEW MEXICO

HECTOR H. BALDERAS
Attorney General

February 25, 2021

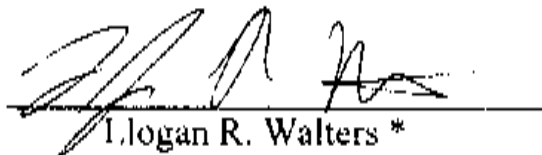
By: MS
Mark F. Swanson
Assistant Attorney General
Office of the New Mexico Attorney General
408 Galisteo St.
Santa Fe, NM 87504
(505) 490-4885
mswanson@nmag.gov
NM#145735

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF NORTH CAROLINA

February 24, 2021

By:




Logan R. Walters *

Assistant Attorney General
North Carolina Department of Justice
Post Office Box 629
Raleigh, North Carolina 27602
(919) 716-6000
lwalters@ncdoj.gov
NC State Bar No. 51050

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF OHIO

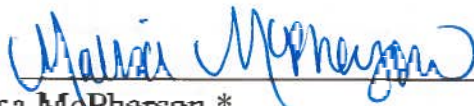
February 11, 2021

By: 
Abigail A. K. Jacobs*
Senior Assistant Attorney General
Office of Attorney General Dave Yost
30 E. Broad St., 25th Floor
Columbus, OH 43215
(614) 466-3181
Abigail.Jacobs@OhioAttorneyGeneral.gov
OH 0088091

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF OKLAHOMA

February 22, 2021

By: 
Malisa McPherson *
Deputy Chief Assistant Attorney General
Office of the Oklahoma Attorney General
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
(405) 521-3921
Malisa.McPherson@oag.ok.gov
OK #32070

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

COMMONWEALTH OF PENNSYLVANIA
JOSH SHAPIRO, Attorney General*

February 10, 2021

By: _____

Mark A. Pacella*

Chief Deputy Attorney General

Lisa M. Rhode

Senior Deputy Attorney General

Office of the Attorney General

Charitable Trusts and Organizations Section

14TH Fl., Strawberry Square

Harrisburg, PA 17120

717.705.2536

mpacella@attorneygeneral.gov

lrhode@attorneygeneral.gov

PA 42214 (Mark A. Pacella)

PA 64556 (Lisa M. Rhode)

*Attorney not admitted in this District, co-signing
pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE STATE OF TENNESSEE
ATTORNEY GENERAL AND SECRETARY
OF STATE**

Feb. 25, 2021

By:



JANET M. KLEINFELTER *

Deputy Attorney General

Public Interest Division

Office of Tennessee Attorney General

P.O. Box 20207

Nashville, TN 37202

(615) 741-7403

Janet.kleinfelter@ag.tn.gov

TN # 013889

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF UTAH

FEB 24, 2021 By: 

Spencer E. Austin
Chief Criminal Deputy
Office of Attorney General
Utah State Capitol
350 North State Street, Ste 230
Salt Lake City, UT 84114-2320
(801) 281-1267
spenceraustin@agutah.gov
UT 150

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF WASHINGTON

Feb. 11, 2021

By: 

JOSHUA STUDOR

Assistant Attorney General

Office of Attorney General

800 5th Ave.

Suite 2000

Seattle, WA 98104

(206) 464-6684


Joshua.studor@atg.wa.gov

WA 47183

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF WEST VIRGINIA

February 12, 2021

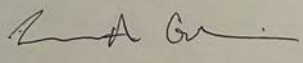
By: 
Tanya L. Godfrey*
Assistant Attorney General
Office of the West Virginia Attorney General
812 Quarrier Street, 1st Floor
PO Box 1789
Charleston, WV 25326
304-558-8986
Tanya.L.Godfrey@wvago.gov
WV Bar No. 7448

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE STATE OF WISCONSIN
JOSHUA L. KAUL
WISCONSIN ATTORNEY GENERAL**

February 15, 2021

By:



Shannon A. Conlin
Assistant Attorney General
State of Wisconsin Department of Justice
17 West Main Street
P.O. Box 7857
Madison, WI 53707-7857
(608) 266-1677
conlinsa@doj.state.wi.us
Wisconsin Bar Number 1089101

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF WYOMING

2/24, 2021

By: Bridget Hill
Bridget Hill *
Attorney General
State of Wyoming
WY Bar No. 6-3616

2/24, 2021

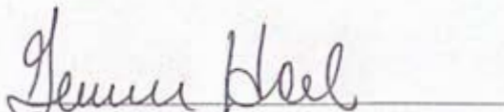
By: Kit Wendtland
Kit Wendtland *
Assistant Attorney General
State of Wyoming
2320 Capitol Av.
Cheyenne, WY 82002
307-777-3795
kit.wendtland@wyo.gov
WY Bar No. 7-6276
Counsel of Record for the State of Wyoming

*Attorneys not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).

FOR THE STATE OF FLORIDA

February 11, 2021

By:



Genevieve Hall

Senior Attorney
Florida Department of Agriculture and
Consumer Services
407 S. Calhoun St.
Tallahassee, Florida 32399
(850) 245-1040
Genevieve.Hall@FDACS.Gov
FL Bar #724661

*Attorney not admitted in this District, co-signing
pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE NORTH CAROLINA
DEPARTMENT OF THE SECRETARY
OF STATE**

February 11, 2021

By:  _____

Jeremy D. Lindsley *
Assistant Attorney General, on behalf of the
North Carolina Department of the Secretary
of State
North Carolina Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629
(919) 716-6400
jlindsley@ncdoj.gov
NC State Bar No. 26235

*Attorney not admitted in this District, co-signing
pursuant to LR 83.20(i)(1)(D)(i).

**FOR THE DIVISION OF CONSUMER
PROTECTION, UTAH DEPARTMENT
OF COMMERCE**

FEB 25th, 2021

By: 
Sterling R. Corbett

Assistant Attorney General
Counsel for Utah Division of Consumer Protection
Office of Attorney General
160 East 300 South, 5th Floor
P.O. Box 140872
Salt Lake City, UT 84114-0872
(801) 366-0310
sterlingc@agutah.gov
UT 12319

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).


FOR THE DISTRICT OF COLUMBIA

KARL A. RACINE

Attorney General

District of Columbia

February 16, 2021

By: 
Kathleen Konopka* (D.C. Bar No. 495257)
Deputy Attorney General

Catherine A. Jackson
(D.C. Bar No. 1005415)
Chief, Public Integrity Section

Leonor Miranda (D.C. Bar No. 1044293)
Assistant Attorney General

Office of Attorney General
for the District of Columbia
400 6th Street N.W., 10th Floor
Washington, D.C. 20001
(202) 724-6610
Kathleen.Konopka@dc.gov
Catherine.Jackson@dc.gov
Leonor.Miranda@dc.gov

*Attorney not admitted in this District, co-signing pursuant to LR 83.20(i)(1)(D)(i).