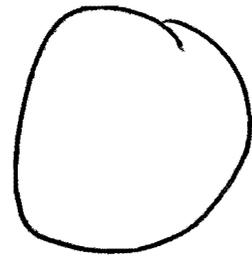


ER



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION, STATE OF ILLINOIS, STATE OF IOWA, STATE OF NEVADA, STATE OF NORTH DAKOTA, STATE OF NORTH CAROLINA, STATE OF OHIO, and STATE OF VERMONT,

Plaintiffs,

v.

YOUR MONEY ACCESS, LLC, YMA COMPANY, LLC, DERRELLE JANEY, and TARZENE DIXON,

Defendants.

FILED

AUG 12 2010

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

CIVIL NO. 07-5147

**STIPULATED FINAL ORDER
AS TO DERRELLE JANEY**

Plaintiffs, the Federal Trade Commission ("FTC" or the "Commission"), and the States of Illinois, Iowa, Nevada, North Dakota, North Carolina, Ohio, and Vermont, by and through their respective Attorneys General ("Plaintiff States") (collectively, "Plaintiffs"), have filed a Complaint against Defendants Your Money Access, LLC ("Your Money Access"), d/b/a Universal Payment Solutions, Netchex Corp., Check Recovery Systems, Inc., Subscription Services, Ltd., and Nterglobal Payment Solutions; YMA Company, LLC ("YMA Company"); Derrelle Janey ("Mr. Janey"); and Tarzene Dixon (collectively, "Defendants"), seeking a permanent injunction and other equitable relief, pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b; the Telemarketing and Consumer Fraud and Prevention Act ("Telemarketing Act"), 15 U.S.C. §§ 6101, *et seq.*; the FTC's Telemarketing Sales Rule ("TSR"), 16 C.F.R. Part 310; the Illinois Consumer Fraud and

Deceptive Business Practices Act, 815 ILCS §§ 505/1 *et seq.* (West 2006); the Iowa Consumer Fraud Act, Iowa Code § 714.16; the Deceptive Trade provisions of NRS Chapter 598; the North Carolina Unfair and Deceptive Trade Practices Act, N.C. Gen. Stat. § 75-1.1, *et seq.*; the North Dakota Century Code Ch. 54-12 and 15 U.S.C. § 6103; the Ohio Consumer Sales Practices Act, R.C. 1345.01 *et seq.*; and the Vermont Consumer Fraud Act, Title 9 Vt. Stat. Ann. Ch. 63. Plaintiffs and Mr. Janey, by and through their counsel, hereby consent to this Stipulated Final Order, and request the Court to make enforceable this agreement entered into by Mr. Janey in lieu of continued litigation by entering it as a Final Order (“Order”), to resolve all matters of dispute between Plaintiffs and Mr. Janey in this action.

IT IS HEREBY STIPULATED, AGREED, AND ORDERED as follows:

1. This Court has jurisdiction over the subject matter and parties in this case.
2. Venue is proper as to all parties in the Eastern District of Pennsylvania pursuant to 15 U.S.C. §§ 53(b) and 6103(e), and 28 U.S.C. §§ 1391(b) and (c).
3. The activities of Mr. Janey are in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
4. The facts that Plaintiffs have stated in their Complaint, if true, would state a claim upon which relief may be granted pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 45(a), 53(b) and 57b; the Telemarketing Act, 15 U.S.C. §§ 6101 *et seq.*; the TSR, 16 C.F.R Part 310; the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS §§ 505/1 *et seq.* (West 2006); the Iowa Consumer Fraud Act, Iowa Code Section 714.16; the Deceptive Trade provisions of NRS Chapter 598; the North Carolina Unfair and Deceptive Trade Practices

Act, N.C. Gen. Stat. § 75-1.1, *et seq.*; the North Dakota Century Code Ch. 54-12 and 15 U.S.C. § 6103; the Ohio Consumer Sales Practices Act, R.C. 1345.01 *et seq.*; and the Vermont Consumer Fraud Act, Title 9 Vt. Stat. Ann. Ch. 63.

5. The parties have agreed to settle this action and in doing so Mr. Janey expressly does not admit any of the allegations, fault, liability, or wrongdoing whatsoever in connection with the violations alleged in the complaint.

6. Mr. Janey has entered into this Order freely and without coercion, and Mr. Janey acknowledges that he has read the provisions of this Order, understands them, and is prepared to abide by them.

7. Plaintiffs and Mr. Janey, by and through their counsel, have agreed that the entry of this Order resolves all matters in dispute between them arising from the Complaint in this action, up to the date of entry of this Order.

8. Mr. Janey waives all rights to seek appellate review or otherwise challenge or contest the validity of this Order. Mr. Janey further waives and releases any claim he may have against Plaintiffs, their employees, representatives, or agents.

9. Mr. Janey agrees that this Order does not entitle Mr. Janey to seek or to obtain attorneys' fees as a prevailing party under the Equal Access to Justice Act, 28 U.S.C. § 2412, and Mr. Janey further waives any rights to attorneys' fees that may arise under said provision of law.

10. The parties agree, for purposes of facilitating resolution of this matter, that entry of this Order is in the public interest.

11. The Court enters this Order pursuant to the stipulated agreement of the parties and nothing in the Order shall be construed as a finding on the underlying merits of the action.

ORDER

DEFINITIONS

For the purpose of this Order, the following definitions shall apply:

1. "Automated Clearing House Network" or "ACH Network" means the electronic funds transfer system governed by the NACHA Rules that provide for the interbank clearing of credit and debit entries to accounts at financial institutions.
2. "ACH Debit" means any completed or attempted debit to a bank account at a financial institution that is processed electronically through the ACH Network.
3. "NACHA" means NACHA - The Electronic Payments Association.
4. "NACHA Rules" mean the NACHA Operating Rules, as amended from time to time.
5. "Order" means this Stipulated Permanent Injunction and Final Order.
6. "Payment Processing Services" means a service or product designed to provide systematic access to the bank accounts of consumers through the use of Remotely Created Checks (a/k/a Draft Checks) and/or ACH Debits.
7. "Person" means any individual, group, unincorporated association, limited or general partnership, corporation, or other business entity.
8. "Remotely Created Check" means any check not created by the paying bank and not bearing a signature applied (or purporting to be applied) by the person on whose account the check is drawn, and shall be construed to include (without limitation) instruments known as demand drafts, bank drafts, telechecks, or bank checks.
9. "Seller" means any Person who, in connection with a Telemarketing transaction, provides, offers to provide, or arranges for others to provide goods or services to the customer in

exchange for consideration, whether or not such Person is under the jurisdiction of the Commission.

10. "Telemarketer" means any Person who, in connection with Telemarketing, initiates or receives telephone calls to or from a customer or donor.

11. "Telemarketing" means a plan, program, or campaign which is conducted to induce the purchase of goods or services or a charitable contribution, by use of one or more telephones and which involves more than one interstate telephone call. The term does not include the solicitation of sales through the mailing of a catalog which: contains a written description or illustration of the goods or services offered for sale; includes the business address of the seller; includes multiple pages of written material or illustrations; and has been issued not less frequently than once a year, when the person making the solicitation does not solicit customers by telephone but only receives calls initiated by customers in response to the catalog and during those calls takes orders only without further solicitation. For purposes of the previous sentence, the term "further solicitation" does not include providing the customer with information about, or attempting to sell, any other item included in the same catalog which prompted the customer's call or in a substantially similar catalog.

12. "Telemarketing Sales Rule" or "TSR" means the Federal Trade Commission's Telemarketing Sales Rule, 16 C.F.R. Part 310, attached hereto as Appendix A or as may be hereafter amended.

13. The words "and" and "or" shall be understood to have both conjunctive and disjunctive meanings.

I.

CONDUCT RELIEF

As part of the settlement of this action, Mr. Janey agrees that, whether acting directly or through any business entity that he directly or indirectly controls or in which he has a majority ownership interest, he will not engage in, participate in, supervise, or assist in any manner or in any capacity in the provision, sale, or arrangement of Payment Processing Services as defined herein.

IT IS THEREFORE ORDERED that, by consent of the parties:

- A. Mr. Janey's agreement regarding Payment Processing Services, as stated above in this Section, is hereby incorporated into this Order; and
- B. Said agreement is enforceable by this Court.

Provided, however, that this Section shall not prohibit Mr. Janey from employment with any business entity or person that provides Payment Processing Services as a function of its business operations, so long as Mr. Janey's participation in such employment is unrelated to the provision, sale, or arrangement of Payment Processing Services as defined herein.

II.

CONDUCT RELIEF AS TO TELEMARKETERS

IT IS FURTHER ORDERED that Mr. Janey, and those persons in active concert or participation with him who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any person, corporation, trust, limited liability company, or other business entity or device, shall not provide substantial assistance or support to any Seller or Telemarketer, when Mr. Janey knows, or consciously avoids knowing, that the Seller or

Telemarketer is engaged in a deceptive or abusive act or practice prohibited by the Telemarketing Sales Rule.

III.

MONETARY JUDGMENT

IT IS FURTHER ORDERED that:

A. As agreed and stipulated by the parties, judgment in the amount of six-hundred-twenty-five-thousand dollars (\$625,000) is hereby entered against Mr. Janey. Based upon Mr. Janey's sworn representations in his financial statements as described in Subsection G of this Section, and upon payment of fifteen-thousand dollars (\$15,000) by Mr. Janey pursuant to Subsection B of this Section, enforcement of the foregoing monetary judgment is stayed, subject to the provisions set forth in subparagraph G of this Section. The Plaintiffs agree that, so long as the monetary judgment is stayed, they will not register or record the monetary judgment in any jurisdiction or apply the monetary judgment as a lien on any property of Mr. Janey.

B. Within five (5) business days after entry of this Order by the Court, Mr. Janey shall transfer fifteen-thousand dollars (\$15,000) in the form of a wire transfer to the account of the Federal Trade Commission, or by certified check, made payable to the FTC, or to such agent as the Commission may direct.

C. All funds paid pursuant to this Section shall be deposited into a fund administered by Plaintiffs or their agent to be used for equitable relief, including, but not limited to, consumer redress and any attendant expenses for the administration of any redress fund. In the event that direct redress to consumers is wholly or partially impracticable or that funds remain after redress is completed, Plaintiffs may apply any remaining funds for such other equitable relief (including

consumer information remedies) as they determine to be reasonably related to the practices alleged in the Complaint. Any funds not used for such equitable relief shall be deposited into the United States Treasury as disgorgement. Mr. Janey shall have no right to challenge Plaintiffs' choice of remedies under this Section.

D. Mr. Janey relinquishes all dominion, control, and title to the funds paid pursuant to the fullest extent permitted by law. Mr. Janey shall make no claim to or demand return of the funds, directly or indirectly, through counsel or otherwise.

E. Mr. Janey agrees that the facts as alleged in the Complaint filed in this action shall be taken as true without further proof in any bankruptcy case or subsequent civil litigation pursued by the Commission to enforce its rights to any payment or money judgment pursuant to this Order, including but not limited to a nondischargeability complaint in any bankruptcy case. Mr. Janey further stipulates and agrees that the facts alleged in the Complaint establish all elements necessary to sustain an action pursuant to, and that this Order shall have collateral estoppel effect for purposes of, Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S. C. § 523(a)(2)(A).

F. Upon entry of this Order by the Court, as provided in subparagraph B of this Section, the remainder of Mr. Janey's monetary judgment shall be suspended subject to the conditions set forth in subparagraph E of this Section;

G. Plaintiffs' agreement to, and the Court's entry of, this Order are expressly premised upon the truthfulness, accuracy, and completeness of the sworn financial statements and supporting documents provided to the Commission by Mr. Janey, on or about May 19, 2007, on or about October 22, 2007, on or about May 7, 2010, on or about May 27, 2010, on or about May 28, 2010, on or about June 8, 2010, and on or about June 15, 2010, which contain material

information upon which Plaintiffs relied in negotiating and agreeing to the terms of this Order. If, upon motion by any Plaintiff, with notice to Mr. Janey and his counsel, this Court finds that Mr. Janey failed to disclose any material asset or materially misstated the value of any asset in the financial statements and related documents described above, or made any other material misstatement or omission in the financial statements and related documents described above, then the stay of enforcement of the judgment shall be lifted for the purpose of enforcing the full amount of the judgment, six-hundred-twenty-five-thousand dollars (\$625,000), less the sum of any amounts paid pursuant to subparagraph B of this Section. *Provided, however*, that in all other respects this Order shall remain in full force and effect, unless otherwise ordered by the Court. Solely for the purposes of enforcing this Section, Mr. Janey waives any right to contest any of the allegations set forth in the Complaint filed in this matter;

H. In accordance with 31 U.S.C. § 7701, Mr. Janey is hereby required, unless he has done so already, to furnish to the Commission all taxpayer identifying numbers, including Social Security and employer identification numbers; and

I. Proceedings instituted under this Section are in addition to, and not in lieu of, any other civil or criminal remedies that may be provided by law, including any other proceedings that Plaintiffs may initiate to enforce this Order.

J. The monetary judgment set forth in this Section is entered pursuant to the stipulated agreement of the parties and the entry of that judgment shall not be construed as a finding on the underlying merits of the action.

IV.

COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of (i) monitoring and investigating compliance with any provision of this Order and (ii) investigating the accuracy of Mr. Janey's financial statements upon which the Plaintiffs' agreement to this Order is expressly premised:

A. Within fifteen (15) days of receipt of written notice from a representative of the Commission provided to Mr. Janey's counsel of record, Mr. Janey shall submit additional written reports, which are true and accurate and sworn to under penalty of perjury; produce documents for inspection and copying; appear for deposition; and provide entry during normal business hours to any business location in his possession or direct or indirect control to inspect the business operation, *provided* that, if Mr. Janey objects to a request made under this subparagraph, he may, after attempting to resolve a dispute without court action and for good cause shown, file a motion with this Court seeking an order including one or more of the protections set forth in Fed. R. Civ. P. 26(c);

B. In addition, the Commission is authorized to use all other lawful means, including but not limited to:

1. obtaining discovery from any person, without further leave of court, using the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, 45 and 69;
2. having its representatives pose as consumers and suppliers to Mr. Janey, his employees, or any other entity managed or controlled in whole or in part by Mr. Janey, without the necessity of identification or prior notice; and

C. Mr. Janey shall permit representatives of the Commission to interview any employer, consultant, independent contractor, representative, agent, or employee who has agreed to such an interview, relating in any way to any conduct subject to this Order. The person interviewed may have counsel present.

Provided however, that nothing in this Order shall limit 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, to obtain any documentary material, tangible things, testimony, or information relevant to unfair or deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C. § 45(a)(1)).

V.

COMPLIANCE REPORTING

IT IS FURTHER ORDERED that, in order that compliance with the provisions of this Order may be monitored:

- A. For a period of three (3) years from the date of entry of this Order:
1. Mr. Janey shall notify the Commission of the following:
 - a. Any changes in his residence, mailing addresses, and telephone numbers, within ten (10) days of the date of such change;
 - b. Any changes in his employment status (including self-employment), and any change in his ownership in any business entity, within ten (10) days of the date of such change. Such notice shall include the name and address of each business that Mr. Janey is affiliated with, employed by, creates or forms, or performs services for; a detailed description of the nature of the business; and a detailed

description of his duties and responsibilities in connection with the business or employment; and

c. Any changes in his name or use of any aliases or fictitious names within ten (10) days of the date of such change;

2. Mr. Janey shall notify the Commission of any changes in structure of any business entity that he directly or indirectly controls, or has an ownership interest in, that may affect compliance obligations arising under this Order, including but not limited to: incorporation or other organization; a dissolution, assignment, sale, merger, or other action; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order; or a change in the business name or address, at least thirty (30) days prior to such change, *provided that*, with respect to any such change in the business entity about which Mr. Janey learns less than thirty (30) days prior to the date such action is to take place, Mr. Janey shall notify the Commission as soon as is practicable after obtaining such knowledge.

B. One hundred eighty (180) days after the date of entry of this Order and annually thereafter for a period of three (3) years, Mr. Janey shall provide a written report to the FTC, which is true and accurate and sworn to under penalty of perjury, setting forth in detail the manner and form in which he has complied and is complying with this Order. This report shall include, but not be limited to:

1. His then-current residence address, mailing addresses, and telephone numbers;
2. His then-current employment status (including self-employment), including the name, addresses, and telephone numbers of each business that he is affiliated with,

employed by, or performs services for; a detailed description of the nature of the business, including a statement addressing whether the business engages in or provides Payment Processing Services; and a detailed description of his duties and responsibilities in connection with the business or employment, including a statement explaining the relationship, if any, between those duties and responsibilities and the provision of Payment Processing Services;

3. Any other changes required to be reported under Subsection A of this Section; and
 4. A copy of each acknowledgment of receipt of this Order, obtained pursuant to the Section titled "Distribution of Order."
- C. Mr. Janey shall notify the Commission of the filing of a bankruptcy petition by him within fifteen (15) days of filing.
- D. For the purposes of this Order, Mr. Janey shall, unless otherwise directed by the Commission's authorized representatives, send by overnight courier all reports and notifications required by this Order to the Commission, to the following address:

Associate Director for Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580
RE: FTC v. Your Money Access, L.L.C., et al.

Provided that, in lieu of overnight courier, Mr. Janey may send such reports or notifications by first-class mail, but only if he contemporaneously sends an electronic version of such report or notification to the Commission at: DEBrief@ftc.gov.

- E. For purposes of the compliance reporting and monitoring required by this Order, the Commission is authorized to communicate with Mr. Janey through his counsel of

record, as designated in sub-paragraph F, unless the designated counsel ceases representation of Mr. Janey, in which case Mr. Janey shall either notify the Commission of substitute counsel or the Commission will be authorized to communicate with Mr. Janey directly. *Provided however*, nothing in this provision shall limit the Commission's authority to pose as a consumer or supplier pursuant to Subsection B.2 of the Section IV, titled "Compliance Monitoring."

- F. All notices to Mr. Janey's counsel hereunder shall be in writing and delivered via overnight courier to the following address:

Wollmuth Maher & Deutsch LLP
500 Fifth Avenue
New York, New York 10110
ATTN: William F. Dahill, Esq.

VI.

RECORDKEEPING

IT IS FURTHER ORDERED that, for a period of six (6) years from the date of entry of this Order, Mr. Janey shall create and retain the following records for any business that (a) Mr. Janey controls, directly or indirectly, or in which Mr. Janey has a majority ownership interest, and that (b) provides substantial assistance or support to any Seller or Telemarketer:

- A. Accounting records that reflect the cost of goods or services sold, revenues generated, and the disbursement of such revenues;
- B. Personnel records accurately reflecting: the name, address, and telephone number of each person employed in any capacity, including as an independent contractor; that person's job

title or position; the date upon which the person commenced work; and the date and reason for the person's termination, if applicable;

C. Customer and/or client files containing the names, addresses, and phone numbers of customers and/or clients; dollar amounts paid, quantity of items or services purchased, and description of items or services purchased by customers; application forms, sales scripts, and marketing materials submitted by clients; contracts entered into with customers or clients; and any other customer or client information obtained in the ordinary course of business;

D. Complaints and refund requests (whether received directly or indirectly, such as through a third party) and any responses to such complaints or requests;

E. All records and documents necessary to demonstrate full compliance with each provision of this Order, including but not limited to copies of acknowledgments of receipt of this Order required by the Sections titled "Distribution of Order" and "Acknowledgment of Receipt of Order" and all reports the FTC pursuant to the Section titled "Compliance Reporting."

VII.

DISTRIBUTION OF ORDER

IT IS FURTHER ORDERED that, for a period of three (3) years from the date of entry of this Order, Mr. Janey shall deliver copies of the Order as directed below:

A. For any business that (a) Mr. Janey controls, directly or indirectly, or in which he has a majority ownership interest, and that (b) provides substantial assistance or support to any Seller or Telemarketer, Mr. Janey must deliver a copy of this Order to (1) all principals, officers, directors, and managers of that business; and (2) any business entity resulting from any change in structure set forth in Subsection A.2 of the

Section titled "Compliance Reporting." For current personnel, delivery shall be within five (5) days of service of this Order upon Mr. Janey. For new personnel, delivery shall occur prior to them assuming their responsibilities. For any business entity resulting from any change in structure set forth in Subsection A.2 of the Section titled "Compliance Reporting," delivery shall be at least ten (10) days prior to the change in structure.

- B. Mr. Janey must secure a signed and dated statement acknowledging receipt of the Order, within thirty (30) days of delivery, from all persons receiving a copy of the Order pursuant to this Section.

VIII.

ACKNOWLEDGMENT OF RECEIPT OF ORDER

IT IS FURTHER ORDERED that Mr. Janey, within five (5) business days of receipt of this Order as entered by the Court, must submit to Plaintiffs a truthful sworn statement acknowledging receipt of this Order.

IX.

RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order as follows:

- A. For Sections I and II of this Order, this Court shall retain jurisdiction permanently.

B. For Sections III through XI of this Order, this Court shall retain jurisdiction for a period of six (6) years from the date of the entry of this order. *Provided, however*, the expiration of the Court's retention of jurisdiction shall not preclude any party from enforcing the provisions contained in those Sections, or any agreements or restrictions contained therein, in any appropriate forum.

X.

ENFORCEMENT OF STIPULATED FINAL ORDER

IT IS FURTHER ORDERED that, by consent of the parties:

- A. The provisions of this Order, and any agreements or restrictions contained therein, are permanent, unless the specific provision includes an explicit time limitation within its terms.
- B. A violation by Mr. Janey of any provision of this Order, or any agreement or restriction contained therein, including but not limited to the provisions contained in Sections I and II is subject to appropriate sanctions for contempt, upon motion by any Plaintiff, consistent with Section IX of this Order.

XI.

SEVERABILITY

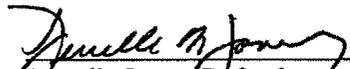
IT IS FURTHER ORDERED that the provisions of this Order are separate and severable from one another. If any provision is stayed or determined to be invalid, the remaining provisions shall remain in full force and effect.

SO ORDERED, this ²11 day of August, 2010


Eduardo C. Robreno
United States District Judge

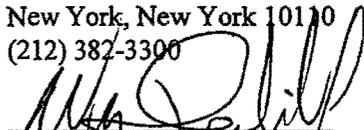
The parties, by their respective counsel, hereby consent to the terms and conditions of the Order as set forth above and consent to the entry thereof.

FOR DEFENDANT JANEY:


Derrelle Janey Defendant

Dated: 7/15/10

William F. Dahill
Wollmuth Maher & Deutsch LLP
500 Fifth Avenue, Suite 1200
New York, New York 10110
(212) 382-3300


Counsel for Derrelle Janey

Dated: 7/15/10

FOR PLAINTIFFS:

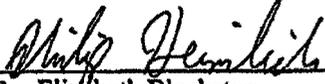


Dated: 8/10/10

Michelle Chua
Robert Schoshinski
Daniel O. Hanks
FEDERAL TRADE COMMISSION
600 Pennsylvania Ave., NW, Rm. 286
Washington, D.C. 20580
(202) 326-3248 (Chua), 3219 (Schoshinski), 2472 (Hanks)
(202) 326-3395 (fax)

Attorneys for Plaintiff FTC

LISA MADIGAN
Attorney General of Illinois


By: Elizabeth Blackston
Philip Heimlich
Assistant Attorneys General
Consumer Fraud Bureau
Illinois Attorney General's Office
500 S. Second Street
Springfield, IL 62706
(217) 782-4436

Dated: 8/5/10

TOM MILLER
Attorney General of Iowa


By: Steve St. Clair
Assistant Attorney General
Iowa Attorney General's Office
1305 East Walnut
Des Moines, Iowa 50319
(515) 281-3731
(515) 281-6771 (fax)

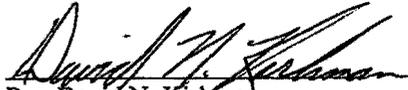
Dated: 8/5/10

CATHERINE CORTEZ MASTO
Attorney General of Nevada


By: John R. McGlamery
Deputy Attorney General
Bureau of Consumer Protection
Office of the Attorney General
100 North Carson Street
Carson City, NV 89701
(775) 684-1169
(775) 684-1170

Dated: 8/6/10

ROY COOPER
Attorney General of North Carolina



By: David N. Kirkman
Assistant Attorney General
North Carolina Department of Justice
114 West Edenton Street
Raleigh, North Carolina 27602
(919) 716-6033
(919) 716-6050 (fax)

Dated: Aug. 5, 2010

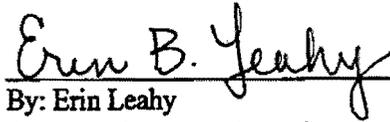
WAYNE STENEHJEM
Attorney General of North Dakota



By: Elin S. Alm
Assistant Attorney General
Office of the Attorney General
Consumer Protection & Antitrust Division
Gateway Professional Center
1050 E. Interstate Ave., Suite 200
Bismarck, ND 58503-5574
(701) 328-5570
(701) 328-5568 (fax)

Dated: Aug. 5, 2010

RICHARD CORDRAY
Attorney General of Ohio


By: Erin Leahy

Assistant Attorney General
Consumer Protection Section
Ohio Attorney General's Office
30 East Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 752-4730
(866) 768-2648 (facsimile)

Dated: 7/27/2010

WILLIAM H. SORRELL
Attorney General of Vermont


By: Elliot Burg

Assistant Attorney General
Vermont Attorney General's Office
109 State Street
Montpelier, VT 05609
(802) 828-2153

Dated: 7/29/10