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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

<p>Federal Trade Commission; all Fifty States; and the District of Columbia;</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>Cancer Fund of America, Inc., a Delaware corporation, et al.;</p> <p style="text-align: center;">Defendants.</p>	<p>CASE NO.</p> <p><b>STIPULATION RE ORDER APPOINTING RECEIVER OVER CHILDREN’S CANCER FUND OF AMERICA, INC.</b></p>
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Plaintiffs, the Federal Trade Commission (“FTC” or “Commission”) and the states of Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming, and the District of Columbia, and Defendant Children’s Cancer Fund of America, Inc. (“CCFOA”), having stipulated to the entry of a separate and concurrently filed Stipulated Order for Permanent Injunction and Monetary Judgment Against Children’s Cancer Fund of America, Inc., and Rose Perkins, further stipulate to

1 the entry of this Stipulated Order Appointing a Receiver Over Children’s Cancer Fund of  
2 America, Inc. (“Order”).

3 THEREFORE, IT IS ORDERED as follows:

4  
5 **FINDINGS**

6 1. Plaintiffs and CCFOA have consented to entry of a Stipulated Order for  
7 Permanent Injunction and Monetary Judgment Against Children’s Cancer Fund of  
8 America, Inc., and Rose Perkins (“Permanent Injunction”).

9 2. The Permanent Injunction requires that the assets of CCFOA be liquidated  
10 to partially satisfy the monetary judgment entered against it and its corporate existence be  
11 dissolved.

12 3. Plaintiffs and CCFOA have consented to entry of this Stipulated Order  
13 Appointing Receiver Over Children’s Cancer Fund of America, Inc.

14 4. Pursuant to the Federal Rules of Civil Procedure, this Court’s general  
15 equitable authority, and Sections 13(b) and 19 of the Federal Trade Commission Act,  
16 15 U.S.C. § 53(b) and 57b, this Court has the authority to enter the requested relief.

17 **DEFINITIONS**

18 For purposes of this Order, the following definitions shall apply:

19 1. “CCFOA” means Children’s Cancer Fund of America, Inc. (“CCFOA”),  
20 and its successors and assigns.

21 2. “GAIC Policies” means the Great American Insurance Company (“GAIC”)  
22 “Nonprofit Solution” Insurance Policies, Policy No. EPP8196687, for the Policy Periods  
23 of: (1) August 7, 2009 to August 7, 2010; (2) August 7, 2010 to August 7, 2011; (3)  
24 August 7, 2011 to August 7, 2012; (4) August 7, 2012 to August 7, 2013; and (5) a  
25 Discovery Period from August 7, 2013 to August 7, 2016.

26 3. “Permanent Injunction” means the Stipulated Order for Permanent  
27 Injunction and Monetary Judgment Against Children’s Cancer Fund of America, Inc.,  
28 and Rose Perkins, agreed to by CCFOA and Rose Perkins.





1 additional insured thereunder. The Receiver acknowledges and agrees that when this  
2 Order is entered, the GAIC Policies are not part of this Order;

3 F. Enter into new or amended contracts, agreements, understandings, or other  
4 commitments and terminate or abrogate, in the Receiver's sole sound business discretion,  
5 any or all agreements, contracts, understandings, or commitments entered into by  
6 CCFOA, to the extent permitted by applicable law. The Receiver shall not be bound by  
7 any unsecured contracts, agreements, understandings, or other commitments in the nature  
8 of service contracts that CCFOA had, have, or may have with third parties, whether oral  
9 or written. The Receiver may agree to become bound by any such contracts, agreements,  
10 understandings, or other commitments by affirmative written ratification executed by the  
11 Receiver. ***Provided that*** the Receiver shall terminate any and all fundraising contracts  
12 within 30 days of entry of this Order.

13 G. Make payments and disbursements from the assets of CCFOA that are  
14 necessary or advisable for carrying out the provisions of, or exercising the authority  
15 granted by, this Order. The Receiver shall apply to the Court for prior approval of any  
16 payment of any debt or obligation incurred by CCFOA prior to the date of entry of this  
17 Order, except payments that the Receiver deems necessary or advisable to secure and  
18 liquidate assets of CCFOA, such as rental payments or payment of liens;

19 H. Issue subpoenas to obtain documents and records pertaining to the assets of  
20 CCFOA and conduct discovery in this action on behalf of CCFOA;

21 I. Institute, prosecute, defend, compromise, intervene, adjust, appear in, and  
22 become a party either in the Receiver's own name or in the name of CCFOA to such  
23 suits, actions, or proceedings in state, federal, or foreign courts as may be necessary for  
24 the protection, maintenance, recovery, recoupment, or preservation of the assets of  
25 CCFOA, including proceedings seeking the avoidance of fraudulent transfers,  
26 disgorgements of profits, imposition of constructive trusts, and any other legal and  
27 equitable relief that the Receiver deems necessary and appropriate to preserve and  
28 recover CCFOA's assets;

1 J. Bring such proceedings and actions as are necessary to enforce or modify  
2 the provisions of this Order;

3 K. Perform all incidental acts that the Receiver deems to be advisable or  
4 necessary to manage the affairs of CCFOA during its winding down phase, liquidate its  
5 assets, and dissolve its corporate existence, including, without limitation, the following  
6 powers and responsibilities to:

7 1. Retain, hire, or dismiss any employees, independent contractors, and  
8 agents as the Receiver deems advisable or necessary;

9 2. Supervise and oversee the management of CCFOA, including  
10 making payments and paying taxes as and when the Receiver has funds available from  
11 CCFOA, or from the liquidation thereof;

12 3. Employ such counsel, real estate agents, auctioneers, appraisers,  
13 accountants, contractors, other professionals, and other such persons as may be necessary  
14 in order to carry out the duties as Receiver and to preserve, maintain, recover, recoup,  
15 and protect the assets of CCFOA;

16 4. Open new accounts with, or negotiate, compromise or otherwise  
17 modify CCFOA's existing obligations with third parties, including utility companies and  
18 other service providers or suppliers of goods and services, and to otherwise enter into  
19 such agreements, contracts, or understandings with such third parties as are necessary to  
20 maintain, preserve, and protect the assets of CCFOA; and

21 5. Open new bank, brokerage or investment accounts with respect to  
22 the Receiver's management and operation of CCFOA, and deposit any cash or other  
23 assets into said accounts;

24 L. Dispose of, or arrange for the disposal of, the records of CCFOA no later  
25 than six months after the Court's approval of the Receiver's final report, except that, to  
26 the extent that any federal, state, or local law regulating CCFOA's activities requires the  
27 retention of particular records for a specified period, the Receiver shall arrange for such  
28 records to be disposed of after the specified period has expired. For any such records, the

1 Receiver may elect to retain records in their original form, or to retain photographic or  
2 electronic copies. Records containing personal financial information, personal  
3 identifying information, or sensitive health information must be shredded, incinerated, or  
4 otherwise disposed of in a secure manner. Records containing the name, address, email  
5 address and/or telephone number of any person who made a donation to CCFOA (i.e.,  
6 any donor list) may not be sold, rented, leased, transferred, or otherwise disclosed to any  
7 third party and must be destroyed; and

8 M. Pay to the STCO Fund any and all sums collected over and above those  
9 necessary to wind down the affairs of CCFOA, liquidate its assets, and dissolve it, or  
10 those necessary to make payments authorized by this Receivership Order.

### 11 **III. TRANSFER OF RECEIVERSHIP PROPERTY TO RECEIVER**

12 IT IS FURTHER ORDERED that CCFOA, its representatives, agents, officers,  
13 directors, employees, managers, members, and any other persons with possession,  
14 custody, interest in, or control of property or records relating to CCFOA shall:

15 A. Upon notice of this Order by personal service or otherwise, immediately  
16 notify the Receiver of all such property and records and, upon receiving a request from  
17 the Receiver, immediately transfer or deliver to the Receiver possession, custody, and  
18 control of the following:

19 1. All assets of CCFOA, including but not limited to any legal or  
20 equitable interest in, right to, or claim to, any real, personal, or intellectual property,  
21 including chattel, goods, instruments, equipment, fixtures, general intangibles, effects,  
22 leaseholds, contracts, mail or other deliveries, shares or stock, securities, inventory,  
23 checks, notes, accounts, credits, receivables (as those terms are defined in the Uniform  
24 Commercial Code), insurance policies (except for the GAIC Policies), lines of credit,  
25 cash, trusts (including asset protection trusts), lists of donor names, and reserve funds or  
26 any other accounts associated with any donations or other payments processed by, or on  
27

1 behalf of, CCFOA, including such reserve funds held by payment processors, credit card  
2 processors, caging companies, banks, or other financial institutions;

3           2. All documents of CCFOA, including books and records of accounts,  
4 all financial and accounting records, balance sheets, income statements, bank records  
5 (including monthly statements, canceled checks, records of wire transfers, and check  
6 registers), client lists, donor lists, title documents, and all other materials listed in Federal  
7 Rule of Civil Procedure 34(a), including writings, drawings, graphs, charts, photographs,  
8 audio and video recordings, computer records, digital records, and other data  
9 compilations from which information can be obtained and translated, if necessary, into  
10 reasonably usable form through detection devices;

11           3. All computers, electronic devices, machines, and data in whatever  
12 form used to conduct the business of CCFOA, and all passwords and other credentials  
13 related thereto;

14           4. All assets and documents belonging to other persons or entities  
15 whose interests are under the direction, possession, custody, or control of CCFOA; and

16           5. All keys, codes, user names, and passwords necessary to gain or to  
17 secure access to any assets or documents of CCFOA, including access to its business  
18 premises, means of communication, accounts, computer systems, or other property; and

19           B. Waive all claims to, and unconditionally release and consent to transfer  
20 possession and legal and equitable title of all property of CCFOA to the Receiver or a  
21 trust designated by the Receiver; and

22           C. Until CCFOA surrenders possession and legal and equitable title of all  
23 property of CCFOA to the Receiver:

24           1. Maintain and take no action to diminish the value of CCFOA's  
25 property, including any structures, fixtures, and appurtenances thereto;

26           2. Remain current on all amounts due and payable on the property of  
27 CCFOA, including but not limited to taxes, insurance, maintenance, and similar fees; and  
28



1 shall authorize and direct the United States Marshal or any sheriff or deputy sheriff of  
2 any county, or any other federal, state, or local law enforcement officer, to seize the asset,  
3 document, or other item covered by this Section and to deliver it to the Receiver.

4  
5 **V. PROVISION OF INFORMATION TO RECEIVER**

6 IT IS FURTHER ORDERED that CCFOA shall provide to the Receiver,  
7 immediately upon request, the following:

8 A. A list of all assets and property, including accounts, of CCFOA that are  
9 held in CCFOA's name, any name other than the name of CCFOA, or by any person or  
10 entity other than CCFOA; and

11 B. A list of all agents, employees, officers, directors, managers, members,  
12 employees, agents, or those persons in active concert and participation with CCFOA,  
13 who have been associated with or done business with CCFOA.

14 **VI. PROHIBITION ON INTERFERENCE WITH THE RECEIVER**

15 IT IS FURTHER ORDERED that CCFOA and its representatives, whether acting  
16 directly or through any entity, corporation, subsidiary, division, director, manager,  
17 member, employee, agent, affiliate, independent contractor, attorney, accountant,  
18 financial advisor, or other device, except as provided herein, as stipulated by the parties,  
19 or as directed by further order of the Court, are hereby restrained and enjoined from:

20 A. Interfering with the Receiver's efforts to manage, or take custody, control,  
21 or possession of, the assets or documents subject to this receivership;

22 B. Transacting any of the business of CCFOA;

23 C. Transferring, receiving, altering, selling, encumbering, pledging, assigning,  
24 liquidating, or otherwise disposing of any assets owned, controlled, or in the possession  
25 or custody of, or in which an interest is held or claimed by, CCFOA or the Receiver; and

26 D. Refusing to cooperate with the Receiver or the Receiver's duly authorized  
27 agents in the exercise of their duties or authority under any order of this Court.

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**VII. STAY OF ACTIONS AGAINST CCFOA**

IT IS FURTHER ORDERED that, except by leave of this Court, during pendency of the receivership ordered herein, CCFOA, its representatives, and other persons seeking to establish or enforce any claim, right, or interest against or on behalf of CCFOA, and all others acting for or on behalf of such persons, are hereby enjoined from taking action that would interfere with the exclusive jurisdiction of this Court over the assets or documents of CCFOA, including:

A. Petitioning, or assisting in the filing of a petition, that would cause CCFOA to be placed in bankruptcy;

B. Commencing, prosecuting, or continuing a judicial, administrative, or other action or proceeding against CCFOA, including the issuance or employment of process against CCFOA, except that such actions may be commenced if necessary to toll any applicable statute of limitations;

C. Filing or enforcing any lien on any asset of CCFOA, taking or attempting to take possession, custody, or control of any asset of CCFOA, or attempting to foreclose, forfeit, alter, or terminate any interest in any asset of CCFOA, whether such acts are part of a judicial proceeding, are acts of self-help, or otherwise; and

D. Initiating any other process or proceeding that would interfere with the Receiver's efforts to manage or take custody, control, or possession of the assets or documents subject to this receivership.

**PROVIDED THAT**, this Order does not stay: (i) the commencement or continuation of a criminal action or proceeding; (ii) the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or (iii) the enforcement of a judgment, other than a monetary judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power.

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**VIII. RECEIVER'S BOND**

IT IS FURTHER ORDERED that the Receiver shall file with the Clerk of this Court a bond in the sum of \$ \_\_\_\_\_ with sureties to be approved by the Court, conditioned that the Receiver will well and truly perform the duties of the office and abide by and perform all acts the Court directs. 28 U.S.C. § 754.

**IX. COMPENSATION OF RECEIVER**

IT IS FURTHER ORDERED that the Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties undertaken pursuant to this Order and for the cost of actual out-of-pocket expenses incurred. The Receiver's compensation and the compensation of any persons hired by the Receiver are to be paid solely from the assets of CCFOA and any proceeds from the liquidation of CCFOA, and such payments shall have priority over all other distributions except for any transfer fees, recording fees, or other payments owed through the transfer of CCFOA's assets. The Receiver shall file with the Court and serve on the parties a request for the payment of reasonable compensation at the time of the filing of periodic reports and no less than every 60 days. The Receiver shall not increase the fees or rates used as the basis for such fee applications without prior approval of Plaintiffs and the Court. CCFOA shall have no right to object to the Receiver's fees or compensation. Absent a violation of this Order that causes the Receiver to incur fees or expenses, CCFOA shall not be liable for the Receiver's fees or expenses.

**X. RECEIVER REPORTS**

IT IS FURTHER ORDERED that the Receiver shall periodically file with the Court, no less than every 60 days, a Receivership Report, under oath, accurately identifying any and all revenues received and expenditures made, including adequately detailed information concerning income, expenses, payables, and receivables. These

1 periodic filings shall be served by the Receiver on Plaintiffs and CCFOA, and their  
2 respective counsel.

3  
4 **XI. TERMINATION OF RECEIVERSHIP**

5 IT IS FURTHER ORDERED that, upon the final transfer of all funds to the STCO  
6 Fund and the dissolution of CCFOA, the duties of the Receiver shall terminate. The  
7 Receiver shall file a final application for fees, complete liquidation, and terminate his or  
8 her service within 360 days of the entry of this Order, unless good cause is shown to  
9 extend the receivership beyond 360 days. At the termination of the Receiver's duties, the  
10 Receiver shall transfer any unliquidated assets of CCFOA to the STCO Fund.

11 SO STIPULATED AND AGREED:

12  
13  
14 April 13, 2015

FOR DEFENDANTS ROSE PERKINS  
AND CHILDREN'S CANCER FUND  
OF AMERICA, INC.:

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Attorneys for Rose Perkins and  
Children's Cancer Fund of America, Inc.

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22 April 10, 2015

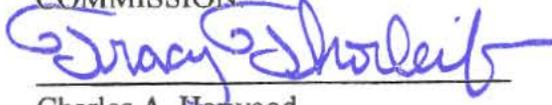
FOR DEFENDANTS ROSE PERKINS  
AND CHILDREN'S CANCER FUND  
OF AMERICA, INC.:

Rose Perkins  
Rose Perkins  
On behalf of herself, individually, and in  
her capacity as an officer of Children's  
Cancer Fund of America, Inc.

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May 15, 2015

FOR PLAINTIFF FEDERAL TRADE COMMISSION:



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Regional Director  
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Krista K. Bush  
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Commission

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**FOR THE STATE OF ALABAMA**

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Alabama*

Signed 05/12, 2015

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**FOR THE STATE OF ALASKA**

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*Attorney for Plaintiff State of Alaska*

Signed May 11, 2015

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**FOR THE STATE OF ARIZONA**

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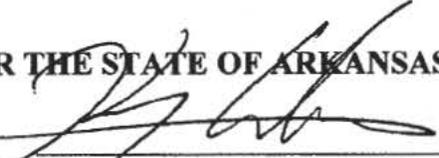
Telephone: 6025424686

*Attorney for Plaintiff State of Arizona*

Signed May 5, 2015

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**FOR THE STATE OF ARKANSAS**

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Arkansas*

Signed May 8, 2015

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**FOR THE STATE OF CALIFORNIA**

By:   
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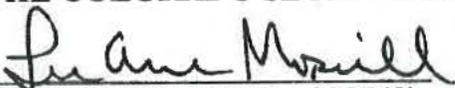
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of California*

Signed , 2015

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**FOR THE COLORADO SECRETARY OF STATE**

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Signed May 7, 2015

**FOR THE STATE OF COLORADO**

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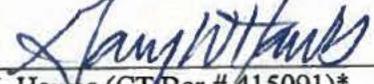
\*Application for *pro hac vice* pending

*Attorney for Plaintiff Colorado Attorney General*

Signed May 8, 2015

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**FOR THE STATE OF CONNECTICUT**

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Connecticut*

Signed April 30, 2015

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**FOR THE STATE OF DELAWARE**

By:   
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Gillian L. Andrews (DE Bar # 5719)  
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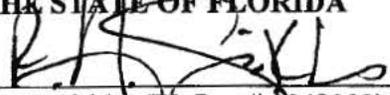
\*Application for *pro hac vice* pending

*Attorneys for Plaintiff State of Delaware*

Signed April 10, 2015

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**FOR THE STATE OF FLORIDA**

By:   
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Rebecca.Sirkle@myfloridalegal.com

Telephone: 407-316-4840

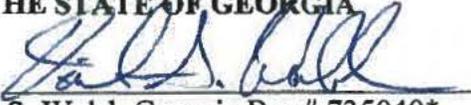
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Florida*

Signed April 9<sup>th</sup>, 2015

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**FOR THE STATE OF GEORGIA**

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Georgia and Plaintiff  
Secretary of State for the State of Georgia*

Signed May 8, 2015

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**FOR THE STATE OF HAWAII**

By: Jodi L. K. Yi  
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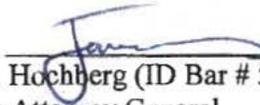
*\*Application for pro hac vice pending*

*Attorney for Plaintiff State of Hawaii*

Signed April 28, 2015

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**FOR THE STATE OF IDAHO**

By:   
Jane E. Hochberg (ID Bar # 5465)\*  
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\*Application for *pro hac vice* pending

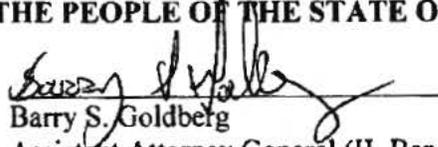
*Attorney for Plaintiff State of Idaho*

Signed March 31, 2015

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**FOR THE PEOPLE OF THE STATE OF ILLINOIS**

By:



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\*Application for *pro hac vice* pending  
*Attorney for Plaintiff State of Illinois*

Signed April 2, 2015

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**FOR THE STATE OF INDIANA**

By: Richard M. Bramer  
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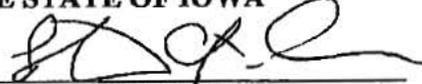
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Indiana*

Signed April 9, 2015

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**FOR THE STATE OF IOWA**

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Iowa*

Signed April 10, 2015

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**FOR THE STATE OF KANSAS**

By: Lynette R. Bakker  
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Kansas*

Signed April 08, 2015

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**FOR THE COMMONWEALTH OF KENTUCKY**

By: Leah Cooper Boggs  
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Kentucky*

Signed May 8, 2015

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**FOR THE STATE OF LOUISIANA**

By: Cathryn E. Gits  
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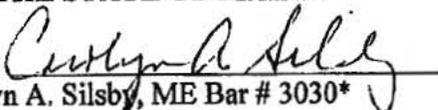
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Louisiana*

Signed May 7, 2015

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**FOR THE STATE OF MAINE**

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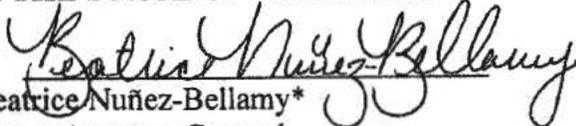
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Maine*

Signed March 31, 2015

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**FOR THE STATE OF MARYLAND**

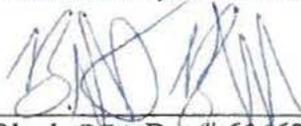
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Attorney for Plaintiff State of Maryland and  
Secretary of State John Wobensmith  
Signed May 14, 2015

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**FOR THE COMMONWEALTH OF  
MASSACHUSETTS**

**MAURA HEALEY, ATTORNEY GENERAL**

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff Commonwealth of Massachusetts*

Signed May 8, 2015

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**FOR THE STATE OF MICHIGAN**

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Michigan*

Signed May 4, 2015

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**FOR THE STATE OF MINNESOTA**

By: Elizabeth Kremenak  
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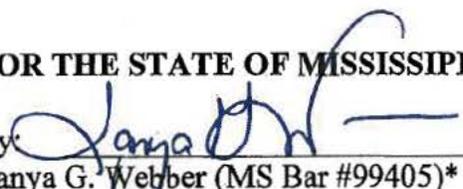
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Minnesota*

Signed March 31, 2015

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**FOR THE STATE OF MISSISSIPPI**

By:   
Tanya G. Webber (MS Bar #99405)\*  
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Mississippi*

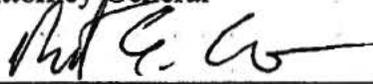
Signed May 8, 2015

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**FOR THE STATE OF MISSOURI**

**CHRIS KOSTER**

Attorney General



**ROBERT E. CARLSON, # 54602**

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Missouri*

Signed May 11, 2015

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**FOR THE STATE OF MONTANA**

By: Kelley L. Hubbard  
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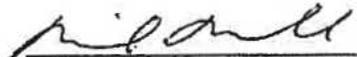
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Montana*

Signed April 10, 2015

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**FOR THE STATE OF NEBRASKA**

By:   
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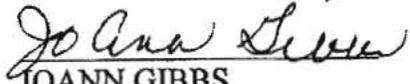
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Nebraska*

Signed May 6, 2015

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**FOR THE STATE OF NEVADA**

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Nevada*

Signed April 30, 2015

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**FOR THE STATE OF NEW HAMPSHIRE**

By:

  
Thomas J. Donovan (NH Bar 664)\*  
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\*Application for *pro hac vice* pending

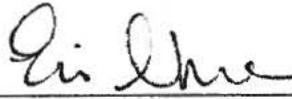
*Attorney for Plaintiff State of New Hampshire*

Signed April 7, 2015

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**FOR THE STATE OF NEW JERSEY**

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of New Jersey*

Signed May 1, 2015

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**FOR THE STATE OF NEW MEXICO**

By: 

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of New Mexico*

Signed 5/5, 2015

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**FOR THE STATE OF NEW YORK**

**ERIC T. SCHNEIDERMAN**  
**Attorney General of the State of New York**

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*\*Application for pro hac vice pending*

*Attorney for Plaintiff State of New York*

Signed May 6, 2015

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**FOR THE STATE OF NORTH CAROLINA**

By: Creecy Johnson  
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of North Carolina*

Signed May 7, 2015

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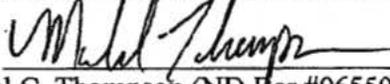
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of North Carolina*

Signed May 7, 2015

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**FOR THE STATE OF NORTH DAKOTA**

By:   
Michael C. Thompson (ND Bar #06550)\*  
Assistant Attorney General

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of North Dakota*

Signed April 8, 2015

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**FOR THE STATE OF OHIO**

By: Yvonne Tertel  
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\*Application for *pro hac vice* pending

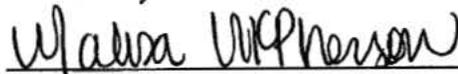
*Attorney for Plaintiff State of Ohio*

Signed May 6, 2015

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**FOR THE STATE OF OKLAHOMA**

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Oklahoma*

Signed May 12, 2015

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**FOR THE STATE OF OREGON**

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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Oregon*

Signed May 5, 2015

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FOR THE COMMONWEALTH OF PENNSYLVANIA

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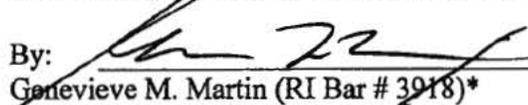
\*Application for *pro hac vice* pending

*Attorney for Plaintiff Commonwealth of Pennsylvania*

Signed April 17, 2015

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**FOR THE STATE OF RHODE ISLAND**

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\*Application for *pro hac vice* pending

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Signed 5/1, 2015

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**FOR THE STATE OF SOUTH CAROLINA**

By:   
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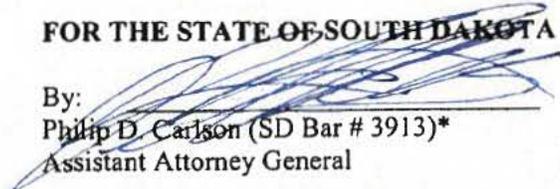
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of South Carolina*

Signed May 7, 2015

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**FOR THE STATE OF SOUTH DAKOTA**

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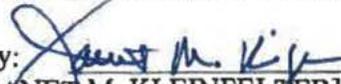
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of South Dakota*

Signed 4/10, 2015

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**FOR THE STATE OF TENNESSEE**

By:   
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\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Tennessee*

Signed April 9, 2015

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**FOR THE STATE OF TEXAS**

**KEN PAXTON**  
Attorney General of Texas

**CHARLES E. ROY**  
First Assistant Attorney General of Texas

**JAMES E. DAVIS**  
Deputy Assistant Attorney General for Civil  
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**TOMMY PRUD'HOMME**  
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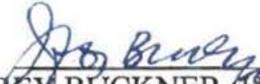
Telephone: 512-475-4673

\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Texas*

Signed May 7, 2015

**FOR THE STATE OF UTAH**

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Application for *pro hac vice* pending

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Signed April 22, 2015

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**FOR THE STATE OF VERMONT**

**WILLIAM H. SORRELL  
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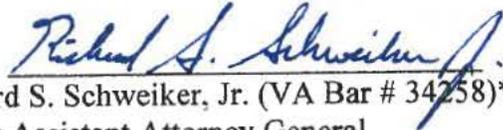
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Vermont*

Signed May 8, 2015

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**FOR THE COMMONWEALTH OF VIRGINIA**

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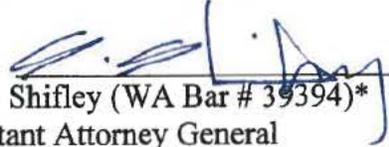
\*Application for *pro hac vice* pending

*Attorney for Plaintiff State of Virginia*

Signed April 27, 2015

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**FOR THE STATE OF WASHINGTON**

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\*Application for *pro hac vice* pending

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Signed May 8<sup>th</sup>, 2015

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**FOR THE STATE OF WEST VIRGINIA**

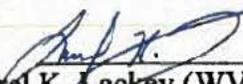
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Signed May 7<sup>th</sup>, 2015

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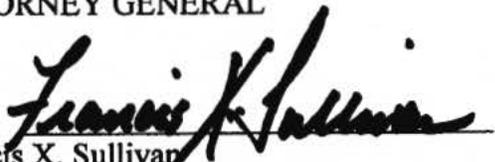
*Attorneys for Plaintiff State of West Virginia*

Signed April 30, 2015

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**FOR THE STATE OF WISCONSIN**

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\*Application for *pro hac vice* pending

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Signed , 2015

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**FOR THE STATE OF WYOMING**

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*Attorney for Plaintiff State of Wyoming*

Signed April 10, 2015

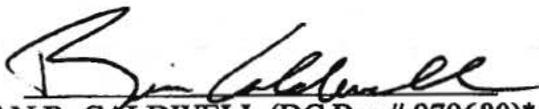
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**FOR THE DISTRICT OF COLUMBIA**

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Attorney General for the District of Columbia

**ELIZABETH SARAH GERE**  
Acting Deputy Attorney General  
Public Interest Division

**BENNETT RUSHKOFF**  
Chief, Public Advocacy Section

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Signed: May 7, 2015