

**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 ROBERT W.  
“BILL” BURLAND AND AMY  
J. BURLAND**

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, 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 Robert W. “Bill” Burland and Amy J. Burland 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 Robert W. “Bill” Burland and Amy J. Burland 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”), 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 Robert W. “Bill” Burland and Amy J. Burland 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 Robert W. “Bill” Burland and Amy J. Burland admit the facts necessary to establish jurisdiction.

4. Defendants Robert W. “Bill” Burland and Amy J. Burland 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 Robert W. “Bill” Burland and Amy J. Burland 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. **“Burland Defendants”** means the individual defendants Robert W. “Bill” Burland and Amy J. Burland.
1. **“Defendant Bill Burland”** means the individual defendant Robert W. “Bill” Burland.
  2. **“Defendant Amy Burland”** means the individual defendant Amy J. Burland.
- B. **“Defendants”** means Associated Community Services, Inc. (“ACS”), also d/b/a A.C. Services; Central Processing Services, LLC (“CPS”); Community Services Appeal, LLC (“CSA”); The Dale Corporation (“Dale Corp.”); Directele, Inc. (“Directele”); 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.
- C. **“Plaintiffs”** means the Commission and the State Plaintiffs (including each state), individually, collectively, or in any combination.
- D. **“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.

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

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

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

H. **“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.

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

J. **“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 Burland Defendants 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 Burland Defendants 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 the Burland Defendants, 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 Burland Defendants 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 Burland Defendants, the Burland Defendants' officers, agents, and employees, 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 Burland Defendants, the Burland Defendants' officers, agents, and employees, 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 Burland Defendants 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 Burland Defendants must provide truthful and complete information, evidence, and testimony. The Burland Defendants 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 STIPLATED that the Burland Defendants, the Burland Defendants’ officers, agents, and employees, 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 ten 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 fifteen 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 be entered against the Burland Defendants 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 Defendant Bill Burland and Defendant Amy Burland, jointly and severally, as equitable monetary relief.

B. Defendant Amy Burland shall pay Four Hundred Fifty Thousand Dollars and no cents (\$450,000.00). This sum will be paid to one or more charities as a Contribution as set forth below, following subsequent motion by the State Plaintiffs and order of this Court.

C. Defendant Amy Burland stipulates that her undersigned counsel holds the monies owed pursuant to Paragraph VII.B in a client trust account for no purpose other than payment to the Florida Department of Legal Affairs Escrow Fund (“Florida Escrow Fund”).

D. The monies owed by Defendant Amy Burland and held in a client trust account by her undersigned counsel shall be transferred within three (3) days of entry of the Order to the Florida Escrow Fund, which shall hold this amount for no purpose other than future payment to one or more charities as a Contribution, unless



otherwise ordered by this Court. This transfer shall be made by wire transfer, cashier's check, or other certified funds made payable to the Florida Department of Legal Affairs Escrow Fund.

E. Upon completion of all payments and requirements described in Paragraphs VII.C and VII.D, the remainder of the judgment is suspended, subject to Paragraphs VII.F and VII.H.

F. Plaintiffs' agreement to the suspension of part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of the Burland Defendants' sworn financial statements and related documents (collectively referred to as "Financial Representations") submitted to the Plaintiffs, namely:

1. The financial statement of Defendant Bill Burland, executed on March 10, 2020;

2. The financial statement of Defendant Amy Burland, executed on March 10, 2020;

3. Supplemental attachments to the March 10, 2020 financial statements, including bank statements and tax returns, produced by the Burland Defendants' undersigned counsel to the Commission on March 10, 2020; April 13, 2020; and May 29, 2020;

4. The sworn Declaration of Amy Jay Burland, executed on September 1, 2020; and

5. The sworn Declaration of Bill Burland executed on September 1, 2020, and the attachment thereto.

G. The suspension of the judgment will be lifted as to Defendant Bill Burland or Defendant Amy Burland if, upon motion by any Plaintiff, the Court finds that either Defendant Bill Burland or Defendant Amy Burland 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.

H. If the suspension of the judgment is lifted as to one or both Burland Defendants, the judgment becomes immediately due as to that Burland 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 Burland Defendants are jointly and severally liable), less any payment previously made by Defendant Amy Burland pursuant to this Section, or by Associated Community Services, Inc.; Central Processing Services, LLC;

Community Services Appeal, LLC; Richard “Dick” T. Cole; 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 made to the Florida Escrow Fund if the Court has not approved one or more charities to receive the Contribution pursuant to Paragraph VII.I. 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.I, then any such payments shall be made to the approved charities.

I. The State Plaintiffs shall identify one or more charities to recommend to this Court as suitable to receive a Contribution. Within ninety days of entry of 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. All monies paid by the Burland Defendants and held in the Florida Escrow Fund shall be distributed only as authorized and directed by this Court. The Burland Defendants shall have no

right to challenge any recommendations regarding any Contribution or monetary distribution made by the State Plaintiffs.

J. Defendant Amy Burland understands that any Contribution to a charity described herein is being made in lieu of consumer restitution and not on behalf of Defendant Amy Burland. Therefore, Defendant Amy Burland stipulates that she will not claim any tax deduction, credit, or other benefit related to any Contribution to a charity discussed in the Order.

### **VIII. ADDITIONAL MONETARY PROVISIONS**

IT IS FURTHER STIPULATED that:

A. The Burland 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 either of the Burland 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. The Burland Defendants acknowledge that their Social Security Numbers, which they 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 Burland Defendants obtain acknowledgments of receipt of the Order:

A. Defendant Bill Burland and Defendant Amy Burland, 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 Bill Burland and Defendant Amy Burland, for any business that he or she, individually or collectively with any other Defendant named in this matter, is the majority owner or controls directly or indirectly, 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 Burland Defendants delivered a copy of the Order, the Burland 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 Burland 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, Defendant Bill Burland and Defendant Amy Burland each must submit a compliance report, sworn under penalty of perjury:

1. Defendant Bill Burland and Defendant Amy Burland 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 Defendant Bill Burland and Defendant Amy Burland 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 Bill Burland and Defendant Amy Burland each 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 either of them performs services whether as an employee or otherwise and any entity in which either of them has any ownership interest; and (c) describe in detail their involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

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

1. Defendant Bill Burland and Defendant Amy Burland each must report any change in: (a) any designated point of contact; or (b) the structure of any Corporate Defendant or any entity that either Defendant Bill Burland and Defendant Amy Burland has any ownership interest in or controls 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 Bill Burland and Defendant Amy Burland each 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 or she performs services whether as an employee or otherwise and any entity in which he or she has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.

C. Defendant Bill Burland and Defendant Amy Burland 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 fourteen 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 Burland 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 Burland Defendants must create certain records for ten years after entry of the Order, and retain each such record for five years. Specifically, for any business that Defendant Bill Burland or Defendant Amy Burland, individually or collectively with any other Defendants, 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 Burland 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, Defendant Bill Burland and Defendant Amy Burland 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 Defendant Bill Burland and Defendant Amy Burland. Defendant Bill Burland and Defendant Amy Burland must permit representatives of any Plaintiff to interview any employee or other individual affiliated with either Defendant Bill Burland or Defendant Amy Burland 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 Defendant Bill Burland or Defendant Amy Burland or any individual or entity affiliated with Defendant Bill Burland or Defendant Amy Burland, 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 Bill Burland and Defendant Amy Burland, 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. 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.

**SO STIPULATED AND AGREED:**

**FOR DEFENDANTS ROBERT W. "BILL" BURLAND AND AMY J. BURLAND:**

September 3, 2020

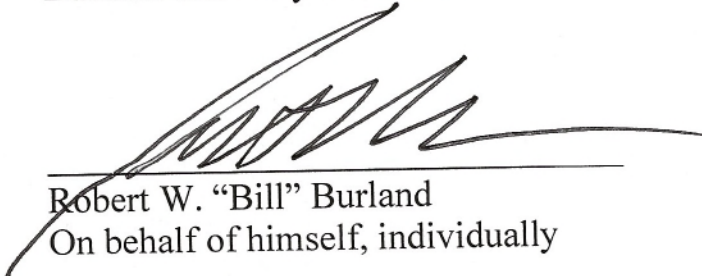


Steven M. Wernikoff  
Honigman LLP  
155 North Wacker Drive  
Chicago, IL 60606  
Email: swernikoff@honigman.com  
Telephone: (312) 701-9380

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

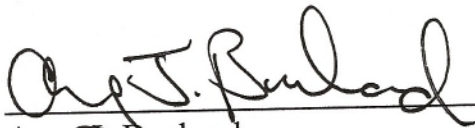
Attorneys for Defendants Robert W. "Bill"  
Burland and Amy J. Burland

9-3, 2020



Robert W. "Bill" Burland  
On behalf of himself, individually

9/3, 2020



Amy J. Burland  
On behalf of herself, 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):

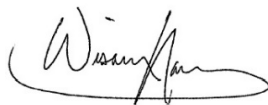
SAIMA MOHSIN  
Acting United States Attorney  
KEVIN R. ERSKINE  
Assistant United States Attorney  
Eastern District of Michigan  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
Phone (313) 226-9610

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](mailto:tthorleifson@ftc.gov)  
[cmacdonald@ftc.gov](mailto:cmacdonald@ftc.gov)  
[sshifley@ftc.gov](mailto: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](mailto: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](mailto: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](mailto: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, 7<sup>th</sup> Floor  
Denver, CO 80203  
(720) 508-6231  
CO Bar No. 42954  
[diane.hazel@coag.gov](mailto: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](mailto: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, 5<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8369  
[Oliver.Cleary@Delaware.gov](mailto: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](mailto:rchalmers@law.ga.gov)  
[dwalsh@law.ga.gov](mailto: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](mailto:bgoldberg@atg.state.il.us)  
Email: [klouis@atg.state.il.us](mailto: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](mailto:kathleen.barceleau@ag.ks.gov)

MI #83169

**FOR THE STATE OF LOUISIANA**

Dec. 4<sup>th</sup>, 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](mailto: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 – 5<sup>th</sup> Floor  
P.O. Box 45029  
Newark, New Jersey 07101  
(973) 648-3070  
[Monisha.Kumar@law.njoag.gov](mailto:Monisha.Kumar@law.njoag.gov)  
NJ Attorney No. 900212012



**FOR THE STATE OF NEW YORK**

LETITIA 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, 4<sup>th</sup> 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](mailto:scot.graydon@oag.texas.gov)

Texas Bar No. 24002175

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

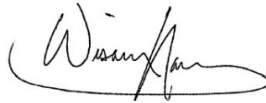
March 3rd, 2021

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 9<sup>th</sup> 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

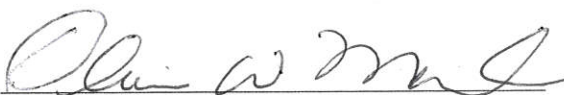
By:



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

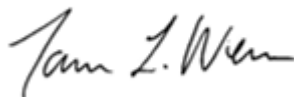


Victoria Ann Butler \*  
Director of Consumer Protection  
Donna Cecilia Valin  
Orlando Bureau Chief  
Office of Attorney General  
State of Florida  
Department of Legal Affairs  
Consumer Protection Division  
135 W. Central Blvd., Suite 1000  
Orlando, FL 32801  
(407) 316-4840  
Ellen.Bullock@myfloridalegal.com  
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 – 5<sup>th</sup> Fl.

302 W. Washington Street

Indianapolis, IN 46204

(317) 234-7122

[Tamara.Weaver@atg.in.gov](mailto:Tamara.Weaver@atg.in.gov)

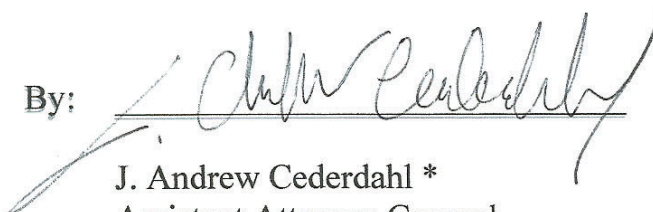
IN 28494-64

\*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 cursive and somewhat stylized.

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

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](mailto: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

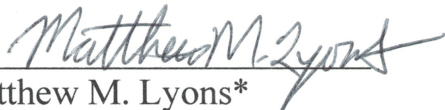
BRIAN E. FROSH  
Attorney General of Maryland

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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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

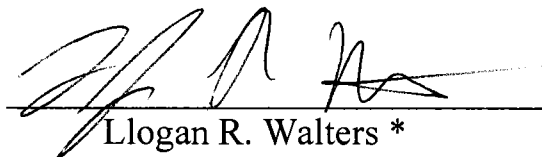
By: MS  
Mark F. Swanson  
Assistant Attorney General  
Office of the New Mexico Attorney General  
408 Galisteo St.  
Santa Fe, NM 87504  
(505) 490-4885  
[mswanson@nmag.gov](mailto:mswanson@nmag.gov)  
NM#145735

\*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:


A handwritten signature in black ink, appearing to read "Logan R. Walters", is written over a horizontal line.

Llogan R. Walters \*  
Assistant Attorney General  
North Carolina Department of Justice  
Post Office Box 629  
Raleigh, North Carolina 27602  
(919) 716-6000  
[lwalters@ncdoj.gov](mailto: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., 25<sup>th</sup> 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

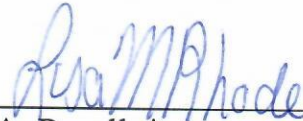
By: Malisa McPherson  
Malisa McPherson \*  
Deputy Chief Assistant Attorney General  
Office of the Oklahoma Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
(405) 521-3921  
Malisa.McPherson@oag.ok.gov  
OK #32070

\*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](mailto:mpacella@attorneygeneral.gov)  
[lrhode@attorneygeneral.gov](mailto: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](mailto: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: 

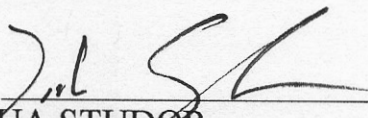
Spencer E. Austin  
Chief Criminal Deputy  
Office of Attorney General  
Utah State Capitol  
350 North State Street, Ste 230  
Salt Lake City, UT 84114-2320  
(801) 281-1267  
[spenceraustin@agutah.gov](mailto:spenceraustin@agutah.gov)  
UT 150

\*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 5<sup>th</sup> 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

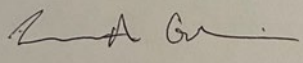
By:   
Tanya L. Godfrey\*  
Assistant Attorney General  
Office of the West Virginia Attorney General  
812 Quarrier Street, 1<sup>st</sup> Floor  
PO Box 1789  
Charleston, WV 25326  
304-558-8986  
Tanya.L.Godfrey@wvago.gov  
WV Bar No. 7448

\*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

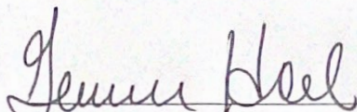
By: Kit Wendtland  
Kit Wendtland \*  
Assistant Attorney General  
State of Wyoming  
2320 Capitol Av.  
Cheyenne, WY 82002  
307-777-3795  
kit.wendtland@wyo.gov  
WY Bar No. 7-6276  
*Counsel of Record for the State of Wyoming*

\*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](mailto: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](mailto: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](mailto:Kathleen.Konopka@dc.gov)  
[Catherine.Jackson@dc.gov](mailto:Catherine.Jackson@dc.gov)  
[Leonor.Miranda@dc.gov](mailto:Leonor.Miranda@dc.gov)

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