

In the matter of)	
LIFELINE INDUSTRIES, INC.,)	ASSURANCE OF
and)	VOLUNTARY COMPLIANCE
J. MICHAEL ZAMPIERI, III,)	
Respondents.)	
)	

Thomas J. Miller, Iowa Attorney General, enters into this Assurance of Voluntary Compliance (“Assurance” or “AVC”) with Lifeline Industries, Inc. (“Lifeline”) and J. Michael Zampieri, III in order to resolve the Attorney General’s concerns that Respondents have engaged in telephone solicitation practices that violate the Iowa Consumer Fraud Act, Iowa Code § 714.16. Respondents deny wrongdoing or liability of any kind, but have agreed to enter into this Assurance in order to resolve all issues raised during the Attorney General’s inquiry into possible Consumer Fraud Act violations by Respondents.

IT IS THEREFORE AGREED pursuant to Iowa R. Civ. P. 1.1501 *et seq.* and the Iowa Consumer Fraud Act, Iowa Code § 714.16, that Respondents, and each of them, and (as applicable) their directors, officers, principals, partners, employees, agents, servants, representatives, subsidiaries, affiliates, successors, assigns, merged or acquired predecessors, parent or controlling entities, shall permanently refrain from engaging in any course of advertising, solicitation, or sale directed to Iowa consumers (or directed to non-Iowans from an Iowa location) that involves express or implied representations that sales or donations benefit the blind, vision impaired, disabled, or disadvantaged. Without limiting the foregoing, Lifeline agrees to engage in no further marketing to Iowa residents, nor in efforts to collect from Iowans in connection with past such marketing.

IT IS FURTHER AGREED that, pursuant to Iowa Code § 714.16, Respondents, and each of them, shall refrain from directly or indirectly selling, renting, sharing, transferring, making available for use by others, or making any use whatsoever of the names and/or other identifying information of persons with Iowa addresses who were customers of Lifeline at any time.

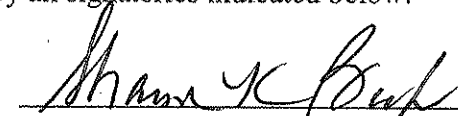
IT IS FURTHER AGREED that, pursuant to Iowa Code § 714.16, Respondents pay to the Attorney General, within three days of the effective date of this AVC, the sum of \$2,000.00, to be deposited by the Attorney General in the fund created by Iowa Code § 714.16A.

IT IS FURTHER AGREED that, pursuant to Iowa Code § 714.16, Respondents and each of them make their best efforts to refund to Iowa customers of Respondents who affirmatively request refunds but do not receive refunds from the Attorney General under the foregoing paragraph.

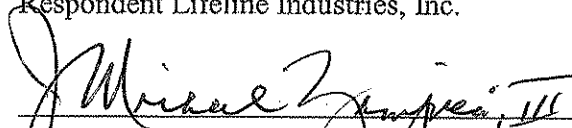
IT IS FURTHER AGREED that a violation of this AVC is deemed a violation of the CFA for purposes of enforcement by the Attorney General.

The Undersigned who have the authority to consent and sign on behalf of the Attorney General of Iowa and Respondents hereby consent to the form and contents of this AVC, which is to take effect immediately upon execution by all signatories indicated below.

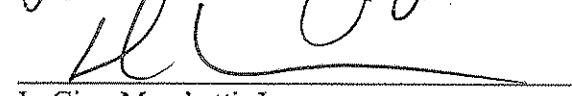
Date: 1-5-12


Respondent Lifeline Industries, Inc.

Date: 1-5-2012


Respondent J. Michael Zampieri, III

Date: 1/6/2012


L. Gino Marchetti, Jr.
Counsel for Respondents

Date: 1-12-12



Steve St. Clair
Assistant Iowa Attorney General