

ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of

Garrett M. Blasko,

Respondent.

The office of the Iowa Attorney General and the above-named Respondent, hereby agree as follows:

This Assurance of Voluntary Compliance (“Assurance”) constitutes a full and final resolution and release of any and all claims by the Iowa Attorney General against Respondent for violations or alleged violations of the Iowa Consumer Fraud Act, Iowa Code § 714.16 (“CFA”) that may have occurred prior to the Effective Date (defined below) of this Assurance and that relate to the affiliate marketing activities of Respondent undertaken in relation to the product Intellux. This Assurance shall take effect when the last signature below is added (the “Effective Date”).

IT IS THEREFORE AGREED that Respondent shall ensure and maintain compliance with the Iowa Consumer Fraud Act, Iowa Code § 714.16, in connection with any efforts online or otherwise to advertise or sell any merchandise to Iowa residents, or to advertise or sell any merchandise to persons outside of Iowa from an Iowa location. Without limiting the foregoing, Respondent hereby agrees to refrain from engaging or participating, directly or indirectly, in any affiliate marketing or other online advertising to Iowa residents: that involves any material misrepresentation of any kind regarding the merchandise being promoted or the nature of the advertiser; that disguises or presents an advertisement as a news story, an unbiased review, or an independent blog; or that involves representations regarding the performance characteristics of any merchandise that cannot be properly substantiated.

IT IS FURTHER AGREED that Respondent will pay \$5,000.00 to the Attorney General, to be deposited into the investigation and litigation fund created by Iowa Code § 714.16A, PROVIDED HOWEVER that such payment obligation will be suspended, and will come due if and only if Respondent is shown to have violated this Assurance in an action by the Attorney General as described in the last paragraph of this Assurance (below).

IT IS FURTHER AGREED that nothing herein diminishes the requirements, duties, obligations, or powers set forth in the Consumer Fraud Act.

IT IS FURTHER AGREED that Respondent cooperate with reasonable requests from the Office of the Iowa Attorney General for information relating to the conduct that gave rise to this Assurance, and/or relating to Respondent's compliance with this Assurance.

IT IS FURTHER AGREED that, in addition to whatever other legal remedies may be available, a violation of this Assurance constitutes a violation of the Iowa Consumer Fraud Act, Iowa Code § 714.16, if established by a preponderance of evidence in an enforcement action by the Attorney General.

Date: 2-26-2018

Garrett M. Blasko
Garrett M. Blasko Subpoena no. 2671

Date: 2-27-18

Steve St. Clair
Steve St. Clair
Assistant Iowa Attorney General