

ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of:

**Brookwater Ventures, LLC and
Clay Taylor,**

Respondents.

The State of Iowa ex rel. Thomas J. Miller, Iowa Attorney General, entered into this Assurance of Voluntary Compliance (AVC) with Brook Water Ventures, LLC (BWV) and Clay Taylor, sole owner and member of BWV, (collectively, Respondents) to resolve the Attorney General's concerns regarding Respondents' compliance with Iowa Code section 714.16, the Iowa Consumer Fraud Act. These alleged violations occurred prior to the "accepted by" date of this AVC and include phone solicitations in which Respondents purport to enable Iowans to generate a substantial monthly income through internet marketing programs.

Each Respondent and their employees, successors, and assigns **AGREES** to:

1. Refrain from engaging or participating, directly or indirectly, in any form of solicitation or communication that:
 - (a) is directed to residents of Iowa or is conducted in whole or in part from a location within Iowa; and
 - (b) involves providing information or materials, whether orally or in writing, which involves the earning of income via online marketing programs;
2. Provide an itemized list of all Iowa customers' names, addresses, and amounts paid by them to Respondents;
3. Provide full refunds upon signing this AVC to all Iowa customers who have not previously received a full refund through payment to the Attorney General with the distribution of refunds to be made by the Attorney General and any undistributed funds to be deposited to the Older Iowans Fund pursuant to Iowa Code section 714.16A;
4. Refrain from the sale, transfer, or any other use of the names of Iowans who were solicited directly or indirectly by Respondents [or who are or were eligible for a refund under paragraph 2]; and
5. Respond fully and promptly to requests from the Attorney General for information or materials relating to the activities prohibited above or compliance with this AVC.

IT IS FURTHER AGREED that nothing within this AVC shall be interpreted to create any private right of action for consumers that would not otherwise exist, nor to diminish any rights or remedial options available to consumers that would otherwise exist.

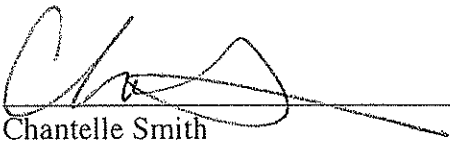
~~**IT IS FURTHER AGREED**~~ that any violation of this AVC is deemed a violation of the Iowa Consumer Fraud Act for purposes of enforcement by the Attorney General, and that in any enforcement action in an Iowa District Court in which one or more violations of this Assurance are established, the Court shall apply the remedies provided by the Iowa Consumer Fraud Act and any other applicable law.

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CONSUMER PROTECTION DIV.

The undersigned who have the authority to consent and sign on behalf of Respondent and the Attorney General of Iowa hereby consent to the form and contents of this Assurance.

Date: 3/8/16 
Clay Taylor

Date: 3/8/16 
For Brookwater Ventures, LLC

Accepted by:
Date: 3/21/16 
Chantelle Smith
Assistant Iowa Attorney General