

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.)	
THOMAS J. MILLER,)	
ATTORNEY GENERAL OF IOWA,)	Equity No. EQCE076788
99AG25112)	
)	
Plaintiff,)	
)	
v.)	
)	
LEGION MARKETING SERVICE, LLC , an)	
Iowa corporation;)	
)	
CHRISTOPHER MICHAEL BRIGHT ,)	
)	CONSENT JUDGMENT
and)	
)	
BRANDY R. BRIGHT ,)	
)	
Defendants)	

The Court, having been presented by Assistant Attorney General Steve St. Clair with this Consent Judgment and having reviewed the file in this matter, determines that final judgment should be entered herein, and finds as follows:

1. Plaintiff State of Iowa ex rel. Thomas J. Miller, Iowa Attorney General, has filed a Petition in Equity against the above-captioned defendants (“Defendants”) pursuant to Iowa Code § 714.16 (2013), the Iowa Consumer Fraud Act (“CFA”), and this Consent Judgment, which has been approved by Plaintiff and each Defendant, is intended to resolve this litigation.

2. The Court has jurisdiction of the parties and subject matter.

3. Defendants deny wrongdoing or liability of any kind, but have agreed to entry of this Consent Judgment in order to resolve their dispute with Plaintiff.

4. The Court finds that this Consent Judgment should be entered.

5. This Consent Judgment constitutes a full and final resolution of any and all claims by the Iowa Attorney General against Defendants for violations of the CFA that occurred prior to the effective date of this Consent Judgment in connection with marketing conducted by and through Legion Marketing Service, LLC (“Legion”).

IT IS THEREFORE ORDERED that Defendants, and each of them, shall be permanently enjoined from engaging, directly or indirectly, in any form of telemarketing, or any form of magazine sales or service, directed to residents of Iowa or directed to residents of other states from an Iowa location. “Telemarketing,” for purposes of this paragraph, does not include using the telephone for the lawful collection of indebtedness existing as of entry of this Consent Judgment.

IT IS FURTHER ORDERED that Defendants, and each of them, cancel without delay any remaining balance on any purported indebtedness or obligation created by, through, or on behalf of Legion, for any person purportedly responsible for paying such balance who previously objected or complained, whether directly to Legion or indirectly through another entity, about the propriety or legitimacy of the indebtedness or obligation, or who hereafter so objects or complains. The cancellation required by this paragraph does not affect any consumer’s right or ability to seek relief beyond such cancellation, and no Defendant may state or imply otherwise.

IT IS FURTHER ORDERED that Defendants and each of them shall hereafter respond appropriately to all reasonable requests from the Attorney General’s office for information relating to compliance with this Consent Judgment by one or more Defendants.

IT IS FURTHER ORDERED that, in addition to whatever other legal remedies may be

available, a violation of this Consent Judgment constitutes a violation of the Iowa Consumer Fraud Act, Iowa Code ' 714.16, and each violation by one of more Defendants of this Consent Judgment, if established in a Consumer Fraud Act action by the Attorney General, gives rise to a presumptive civil penalty in the highest amount provided for by Iowa Code ' 714.16 (7), namely \$40,000.00, provided however that the Court shall retain discretion to assess a lower penalty. Such a "violation" for this purpose shall include without limitation any and each instance of a failure to provide accurate information to the Attorney General in connection with the negotiation of the terms of this Consent Judgment.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction of this action for purposes of enforcing the terms of this Consent Judgment.

IT IS FURTHER ORDERED that Defendants shall pay the court costs of this action.

SO ORDERED.

To be signed (if approved) by a Judge of the Fifth Judicial District of Iowa by appending an official signature page as part of the EDMS filing system

Approved:

Date: 7/9/14

/s/ Brandy Bright

Legion Marketing Service, LLC

Date: 7/9/14 /s/ Christopher Michael Bright

Christopher Michael Bright

Date: 7/9/14 /s/ Brandy Bright

Brandy R. Bright

Date: 7/9/14 /s/ Mark Sherinian

Mark D. Sherinian
Counsel for Defendants

Date: 7/14/14 /s/ Steve St. Clair

Steve St. Clair
Assistant Iowa Attorney General



State of Iowa Courts

Type: ORDER FOR CONSENT DECREE

Case Number **Case Title**
EQCE076788 STATE OF IOWA EX REL. THOMAS J. MILLER V. LEGION M

So Ordered

A handwritten signature in black ink, appearing to read "Michael D. Huppert". The signature is written in a cursive style and is positioned above a horizontal line.

Michael D. Huppert, District Court Judge,
Fifth Judicial District of Iowa