

LETTER OF UNDERSTANDING

**In the matter of:
Global Service Group, LLC;**

Respondent.

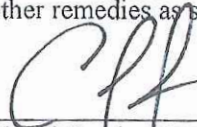
The above-named Respondent enters into this Letter of Understanding (LOU) in order to resolve concerns of the Iowa Attorney General relating to Respondent's pre-LOU provision of payment processing services for companies that charged Iowa residents (i) in the amount of \$8,819.92 in connection with goods or services purportedly provided by Defend My Device, InTouchVoip, and IPCloudSpace, and (ii) in the amount of \$46,218.00 in connection with goods or services purportedly provided by Global Media Source, Inc. The Attorney General alleges that the marketing utilized by Defend My Device, InTouchVoip, IPCloudSpace, and Global Media Source, Inc. and that engendered such charges appears to have violated the Iowa Consumer Fraud Act, Iowa Code § 714.16 ("CFA") and that the charges associated with such marketing appear to have been unauthorized or otherwise unlawful. Respondent denies wrongdoing or unlawful conduct, and this LOU does not constitute evidence to the contrary.

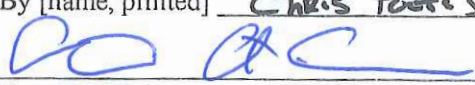
The Attorney General releases Respondent from liability under the CFA for the marketing associated with the above-referenced charges and for such charges themselves, such release to take effect upon the receipt by the Attorney General from Respondent of the total payment described below.

Respondent, and each of its principals, agree: (1) to refrain from engaging or participating, directly or indirectly, in any payment processing directed to Iowa individuals and/or bank accounts in Iowa; (2) to pay \$8,819.92 to be used in the Iowa Attorney General's discretion to make refunds to the Iowa residents affected by the above-referenced conduct, with any funds remaining after reasonable efforts to go into the fund created by Iowa Code § 714.16A; (3) to refrain from any use or transfer of the names of Iowans who are or were eligible for a refund under (2) above; (4) to respond fully and promptly to reasonable requests from the Attorney General for information or materials relating to compliance with this LOU; and (5) that any future violation of this LOU shall constitute a violation of the CFA, and that any such LOU violation if proved by a preponderance of evidence shall give rise to civil penalties and other remedies as set forth in the CFA and/or other applicable law.

Date: 2-1-17

Accepted by:
Date: 2-6-17


Global Service Group, LLC
By [name, printed] Chris Farris


Steve St. Clair
Assistant Iowa Attorney General