

## ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of:

Globe Marketing Group, Inc., and

Deanna S. Stone,

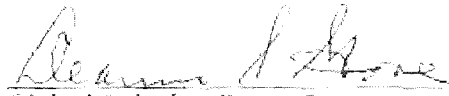
### Respondents.

The above-named Respondents enter into this Assurance of Voluntary Compliance (AVC) in order to resolve concerns of the Iowa Attorney General relating to Respondents' pre-AVC charging of the financial institution accounts of forty-three (43) Iowa residents for a membership program called My Identity Defense. The Attorney General alleges that that the marketing of that membership program and the associated charges to Iowans' financial institution accounts violated the Iowa Consumer Fraud Act, Iowa Code § 714.16 ("CFA") and/or the Iowa Buying Club Memberships Law, Iowa Code Ch. 552A ("BCL").


The Attorney General releases Respondents from liability under the CFA and BCL for the above-described marketing to the above-referenced forty-three (43) Iowa residents and for the charges purportedly resulting from such marketing, and for marketing of the same program to other Iowans who were not ultimately charged or were earlier refunded, such release to take effect upon the receipt by the Attorney General from Respondents of the payment described below.

Respondents, and each of them, agree: (1) to refrain from engaging or participating, directly or indirectly, in the marketing to Iowa residents of (a) any membership program subject to the BCL; and/or (b) any merchandise subject to the CFA; including in each instance charging financial institution accounts in connection with any such marketing; (2) to pay \$18,038.00 to be used in the Iowa Attorney General's discretion to make refunds to the above-referenced forty-three (43) Iowans, one-half of such amount to be paid at the time of execution, and the other one-half to be paid within thirty (30) days thereafter, with any funds remaining after reasonable refund efforts by the Attorney General 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 the activities prohibited above or compliance with this AVC; and (5) that any future violation of this AVC shall constitute a violation of the CFA, and that any such AVC 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: 4-1-2017

  
Globe Marketing Group, Inc.  
by [name printed]: Deanna S. Stone

Date: 4-1-2017


  
Deanna S. Stone

Date: 4-2-17

  
David J. Bartone  
Attorney for Respondents

Accepted by:

Date: 4-12-17

  
Steve St. Clair  
Assistant Iowa Attorney General