

ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of:

Stephen Young,

and

FPH Communications Publishing, dba *inter alia* National Funds Clearing House, Communications Publishing, American Grant Network, and Hamilton Publishing,


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 efforts that pre-date this AVC that involve the alleged misleading advertising or sale of information or materials to Iowans purporting to enable them to acquire wealth through lotteries, money-making opportunities, and/or other means. This AVC is not an admission of liability by Respondents, and Respondents expressly deny the concerns of the Iowa Attorney General as set forth herein.

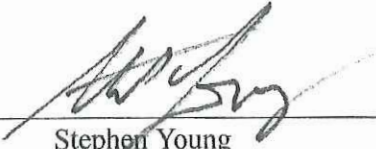
The Attorney General releases Respondents from liability under the Iowa Consumer Fraud Act, Iowa Code § 714.16 ("CFA"), for such advertisements and sales to the extent that they pre-date this AVC.

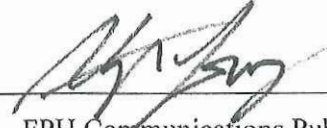
Respondents, and each of them, agree: **(1)** to refrain from engaging or participating, directly or indirectly, in any form of marketing that (a) involves advertising or sale to residents of Iowa, or is conducted in whole or in part from an Iowa location, and also (b) involves the provision of information or materials purporting to enable the recipient to achieve better-than-chance results in lotteries and/or other chance-dominated gaming activities, involves money-making opportunities regarding which the represented results are not achievable through reasonable efforts, and/or involves other deceptive and/or unfair representations or conduct violative of Iowa law; **(2)** to provide a refund to each unrefunded Iowan who paid for information or materials as described in (1)(b) above and who requests such a refund within 180 days from the date hereof; **(3)** to refrain from any use or transfer of the names of Iowans who responded to marketing as described by (1)(b) above; **(4)** to respond promptly and appropriately to reasonable requests from the Attorney General for information or materials relating to the activities subsequent to the execution of and prohibited by or required to be compliant with this AVC; and **(5)** that any non-inadvertent future violation of this AVC shall constitute a violation of the CFA and if proven 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.

Notwithstanding any other provision herein, in connection with online or magazine

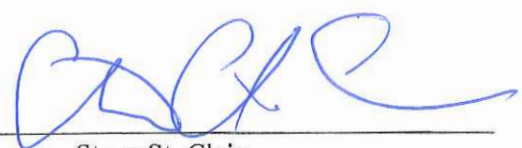


advertising that reaches Iowa residents and from which Iowa residents cannot reasonably be excluded, Respondents are not in violation of this AVC for such advertising that would otherwise violate this AVC to the extent that no orders or payments are accepted from persons with Iowa addresses and that prospective Iowa customers are timely informed that no orders or payments will be accepted from them so that they do not unreasonably expend time or resources attempting to make a purchase that under this AVC is not to be consummated.

Date: 8/12/16 _____

Stephen Young

Date: 8/12/16 _____

FPH Communications Publishing and its dbas,
by [name printed:] Stephen Young

Accepted by:

Date: 8/16/16 _____

Steve St. Clair
Assistant Iowa Attorney General