

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.)	
THOMAS J. MILLER,)	
ATTORNEY GENERAL OF IOWA,)	Equity No. EQCE075310
99AG25112)	
)	
Plaintiff,)	
)	
INTEGRAL RESOURCES, INC.,)	
A Massachusetts corporation;)	
)	CONSENT JUDGMENT
RONALD ROSENBLITH;)	
)	
MICHAEL CAMPBELL; and)	
)	
PAGE GARDNER;)	
)	
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, 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 fundraising conducted by and through Integral Resources, Inc. (hereinafter, "Integral").

IT IS THEREFORE ORDERED that Defendants shall be permanently enjoined for a period of at least five years from engaging, directly or indirectly, in any form of fundraising as a professional commercial fundraiser as defined in Iowa Code § 13C.1(4), whether by telephone or otherwise, directed to residents of Iowa or directed to residents of other states from an Iowa location.

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 by a preponderance of the evidence 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.

IT IS FURTHER ORDERED that Defendants shall make no direct or indirect use whatsoever of information regarding persons in Iowa or elsewhere who made a pledge and/or donation in response to any fundraising efforts of Integral as a professional commercial

fundraiser as defined in Iowa Code § 13C.1(4), if Defendants know or should know under the circumstances that such information was derived as a result of Integral's efforts as a professional commercial fundraiser. This includes without limitation using such information to make fundraising contacts as a professional commercial fundraiser, and/or selling, renting or otherwise making available any such information to another professional commercial fundraiser for use in that entity's activities as a professional commercial fundraiser in the State of Iowa.

IT IS FURTHER ORDERED that Defendants shall comply with reasonable requests from the Attorney General for information relating to compliance with this Consent Judgment.

IT IS FURTHER ORDERED that Defendants shall make their best efforts to make full refunds of specified donations upon receiving a request to do so either directly from the donors or forwarded by the Attorney General.

IT IS FURTHER ORDERED that Integral shall pay the amount of \$30,000.00 within thirty (30) days of execution of this Consent Judgment, and an additional \$70,000.00 after the five-year injunction period should Integral seek re-entry into the State of Iowa after such period to engage, directly or indirectly, in any form of fundraising as a professional fundraiser as defined in Iowa Code § 13C.1(4), whether by telephone or otherwise, directed to residents of Iowa or directed to residents of other states from an Iowa location. All payments under this paragraph shall be made to the Iowa Attorney General, to be deposited into the fund created by Iowa Code § 714.16C (2013).

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

IT IS FURTHER ORDERED that Defendants shall pay court costs, if any.

SO ORDERED this 21st day of October, 2013.

Approved:

Date: 9/30/13

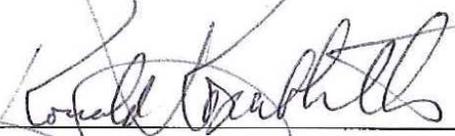
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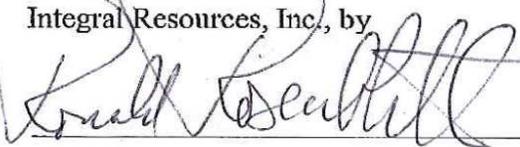
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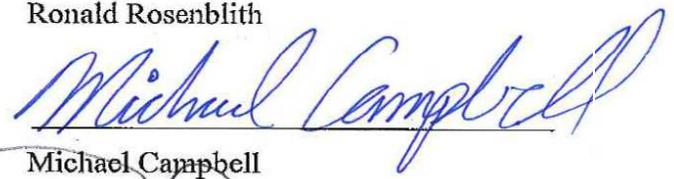
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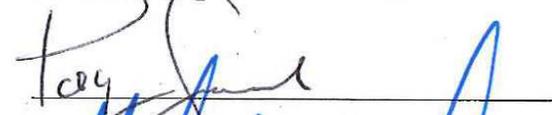
Integral Resources, Inc., by



Ronald Rosenblith



Michael Campbell



Page Gardner



Martin L. McCarthy
Attorney for Defendants



Steve St. Clair
Assistant Iowa Attorney General



State of Iowa Courts

Type: ORDER FOR CONSENT DECREE

Case Number **Case Title**
EQCE075310 STATE OF IOWA EX REL MILLER VS INTEGRAL RESOURCES,
ET AL

So Ordered

A handwritten signature in black ink, appearing to read "Michael D. Huppert". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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