

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.
THOMAS J. MILLER,
ATTORNEY GENERAL OF IOWA,
99AG25112

Plaintiff,

v.

ASSOCIATED COMMUNITY SERVICES,
INC., a Michigan corporation; and

R. WILLIAM BURLAND, JR., in his corporate
capacity as president and CEO of Associated
Community Services, Inc., and individually;

Defendants.

Equity No. CE 66172

PETITION IN EQUITY

CLERK DISTRICT COURT

10 AUG 13 AM 9:11

POLK COUNTY IA

The State of Iowa ex rel. Attorney General Thomas J. Miller, through Assistant Attorney General Steve St. Clair, states as follows for its cause of action against Associated Community Services, Inc. and R. William Burland, Jr., in his corporate and individual capacities:

INTRODUCTION

1. Associated Community Services, Inc. (hereinafter "ACS"), a Michigan corporation with its principal place of business in Southfield, Michigan, makes fundraising calls to residents of various states, including Iowa, from phone rooms in Southfield and Dearborn, Michigan. The calls request donations to charities or non-profits, each of which has contracted to let ACS solicit contributions in the charity's name. In exchange, the charity receives an amount believed to be between 10% and 20% of total donations, and ACS, the fundraising operation, keeps the remainder. Deceptive solicitation calls have been made by ACS representatives into Iowa in violation of Iowa law. ACS telephone fundraisers have failed to identify themselves as representatives of Associated Community Services, Inc., a professional commercial fundraiser;

actively insinuated that they were directly associated with the charitable organization; implied that they were calling from Iowa, rather than Michigan; indicated that fundraising calls were part of a periodic “drive” or “campaign,” rather than a continuous commercial process; suggested to would-be donors that their past contributions were higher than they actually were in order to prompt higher donations; obscured the fact that only 20% of donations were passed on to the charitable organization; and claimed that ‘everything’s on file with the state attorney’s office for your protection,’ thus mischaracterizing the extent and nature of Iowa’s process for registering professional fundraisers in order to overcome the would-be donor’s concerns.

VENUE

2. Venue is proper in Polk County, Iowa, because Defendants have engaged and, upon information and belief, continue to engage in the activities that are the subject of this Petition in Polk County, Iowa. Iowa Code § 714.16 (10) (2009).

PARTIES

3. The Iowa Attorney General is authorized to bring this action by Iowa Code §§ 714.16 (7) and 714.16A (1) (2009).

4. Associated Community Services, Inc. is a Michigan corporation with its principal place of business in Southfield, Michigan, and phone rooms in Southfield and Dearborn, Michigan.

5. R. William Burland, Jr. (“Mr. Burland”) is or at relevant times has been president and CEO of ACS, and at least a part owner. According to the Professional Commercial Fundraiser Registration Materials filed by ACS in July of 2009, Mr. Burland is the person responsible for the day-to-day operations of, and the person who directs and controls the activities of, ASC. Mr. Burland is therefore responsible in his individual and corporate capacities for the violations of

law set forth herein.

JURISDICTION

6. The Iowa Consumer Fraud Act, Iowa Code § 714.16 (2)(a) (2009) ("the Consumer Fraud Act") provides in pertinent part:

The act, use or employment by a person of an unfair practice, deception, fraud, false pretense, false promise, or misrepresentation, or the concealment, suppression or omission of a material fact with intent that others rely upon the concealment, suppression, or omission, in connection with the lease, sale, or advertisement of any merchandise or the solicitation of contributions for charitable purposes, whether or not a person has in fact been misled, deceived, or damaged, is an unlawful practice.

7. Iowa Code § 714.16 (1) provides the following definitions:

(f) "Deception" means an act or practice which has the tendency or capacity to mislead a substantial number of consumers as to a material fact or facts.

(n) "Unfair practice" means an act or practice which causes substantial, unavoidable injury to consumers that is not outweighed by any consumer or competitive benefits which the practice produces.

8. Iowa Code § 714.16 (7) provides, in pertinent part:

Except in an action for the concealment, suppression, or omission of a material fact with intent that others rely upon it, it is not necessary in an action for reimbursement or an injunction, to allege or to prove reliance, damages, intent to deceive, or that the person who engaged in an unlawful act had knowledge of the falsity of the claim or ignorance of the truth.

9. In describing remedies under the Consumer Fraud Act, Iowa Code subsection 714.16 (7) provides in pertinent part as follows:

If it appears to the attorney general that a person has engaged in, is engaging in, or is about to engage in a practice declared to be unlawful by this section, the attorney general may seek and obtain in an action in a district court a temporary restraining order, preliminary injunction, or permanent injunction prohibiting the person from continuing the practice or engaging in the practice or doing an act in furtherance of the practice. The court may make orders or judgments as necessary to prevent the use or employment by a person of any prohibited practices, or which are necessary to restore to any person in interest any moneys ... which have been

acquired by means of a practice declared to be unlawful by this section ...

In addition to the remedies otherwise provided for in this subsection, the attorney general may request and the court may impose a civil penalty not to exceed forty thousand dollars per violation against a person found by the court to have engaged in a method, act, or practice declared unlawful under this section; provided, however, a course of conduct shall not be considered to be separate and different violations merely because the conduct is repeated to more than one person. In addition, on the motion of the attorney general or its own motion, the court may impose a civil penalty of not more than five thousand dollars for each day of intentional violation of a ... permanent injunction issued under authority of this section.

10. Iowa Code §§ 714.16A (1) & (3) (2009) provide, respectively:

If a person violates section 714.16, and the violation is committed against an older person, in an action by the attorney general, in addition to any other civil penalty, the court may impose an additional civil penalty not to exceed five thousand dollars for each such violation.

As used in this section, '*older person*' means a person who is sixty-five years of age or older.

FACTUAL ALLEGATIONS

11. Defendants operate a telephone call center which engages in telemarketing for charitable donations. Upon information and belief, ACS collects in excess of \$10 million annually and has approximately 300 employees.

12. Defendants contract to make solicitations on behalf of various organizations. One such organization is Vietnam Veterans of Iowa, Inc. ("VVIA").

13. Under the fundraising arrangement between ASC and VVIA, only 20% of the funds raised by ACS are retained by VVIA.

14. In order to evaluate the content of phone solicitations directed to prospective donors by ACS, it is important to recognize that telephone fundraising efforts enjoy enhanced success if prospective donors believe:

- a) that the individual soliciting the donation is himself or herself part of the charitable organization, is calling from an Iowa location, and/or is volunteering to assist the charity in raising money (as opposed to being a professional commercial fundraiser);
- b) that the fundraising is performed infrequently, for example, as part of an annual drive or periodic campaign; and/or
- c) that a substantial portion of each donated dollar goes to the worthy cause, as opposed to paying the salaries and expenses of a for-profit telemarketing operation, particularly one based in another state.

15. Defendants have had ample notice of the fact that its employees assigned to telephone fundraising may be prone to misrepresenting certain material facts in order to persuade would-be donors to give:

- a) In March of 2008, ACS entered into an Assurance of Discontinuance with the Ohio Attorney General's Office, in which ACS agreed to certain reforms in order to settle (*inter alia*) the Attorney General's claims: that ACS telemarketers failed to notify potential donors that the caller was employed by ACS, and that ACS was a professional fundraiser; that ACS had engaged in deceptive and misleading acts; and that ACS had violated an earlier Assurance of Discontinuance it had entered into with the Ohio Attorney General's Office in 2002.
- b) In July of 2008, ACS entered into an AVC with the Missouri Attorney General's Office in which ACS agreed to establish and maintain systems and procedures reasonably calculated to ensure compliance with the law, and to maintain an employee training program to ensure compliance with Missouri and federal law, and with company policies governing the solicitation of contributions.
- c) In May of 2009, the Connecticut Attorney General sued ACS for failing to clearly and conspicuously state its name and paid solicitor status in mailings to donors, making such disclosures only on the back of the mailing, in barely legible print.
- d) In January of 2010, the South Carolina Secretary of State issued a Notice to Discontinue Violations to ACS, alleging that an ACS telephone solicitor had failed to disclose his status as a professional fundraiser and failed to disclose ACS's name during a fundraising call.
- e) In May of 2010, the Oregon Attorney General's Office sued ACS alleging (*inter alia*) false and misleading representations in the course of soliciting contributions, focusing primarily on representations regarding how donated funds would be used.

16. In December of 2009, a telephone fundraiser employed by ACS placed a solicitation

call to an Iowa resident on behalf of VVIA. The call was recorded, and a transcript is attached hereto as Attachment I.

17. In the solicitation call referred to in the preceding paragraph, the ACS employee engaged in the following deceptive conduct:

- a) Implied that he was directly associated with the charity (“I was calling *with* the Vietnam Veterans of Iowa ... And *we’re* helping our, our soldiers ...”)¹, and inadequately disclosed his status as a paid employee with a professional commercial fundraising company called Associated Community Services, Inc. (“How ya doing, Ma’am? Bob Sweeney ACS ...”);
- b) Indicated that the call was made “just one time” as part of a “campaign,” when, upon information and belief, such calls are made continuously, year-round, and a given donor is called more frequently than represented;
- c) Implied initially that he was calling from an Iowa location (“*we’re* helping ... *our* soldiers right *here* in Iowa ...”), and acknowledged that he was calling from Michigan only when asked directly;
- d) Made the representation that “everything” was on file with the “state attorney’s office for your protection,” thus falsely implying (among other things) endorsement or approval by state authorities.

18. In April of 2010, a telephone fundraiser employed by ACS placed a solicitation call to an Iowa resident on behalf of VVIA. The call was recorded, and a transcript is attached hereto as Attachment II.

19. In the solicitation call referred to in the preceding paragraph, the ACS employee engaged in the following deceptive conduct:

- a) Implied that he was directly associated with the charity and that the purpose of the call was to thank the supporter for past donations, (“Zachary Dobbins here with a thank you call from the Vietnam Veterans of Iowa ... We just wanted to thank you for always helping ...”), and failed to disclose his status as a paid employee with a professional commercial fundraising company named Associated Community Services, Inc.;
- b) Indicated that the call was made as part of an annual “drive,” when upon information

¹ Emphasis in this and subsequent quotes from recorded calls has been added.

and belief such calls are made continuously, year-round, and a donor is solicited more often than was represented;

c) Implied that he was calling from an Iowa location, rather than Michigan (referring to “our local Veterans *here in Des Moines*,” and saying that “*our* headquarters for the charity is *here* in your own city”);

d) Told the would-be donor that she had ‘usually’ given \$25 in response to previous solicitations (in fact, she had donated \$20 in response to the preceding solicitation, less than five months earlier);

e) Exaggerated the extent to which a donation would promote charitable ends, rather than going primarily to the for-profit fundraiser (“But *all* the money stays local for the veterans here in Iowa”);

e) When asked directly how much of a donation would go to the veterans, initially suggested that only ‘some’ would be diverted from the veterans in order to pay the light and phone bills, but then turned the call over to a ‘helper’ who acknowledged that 20% would go to the charity; however, the so-called “helper” also claimed that providing 20% of a donation to the charity was more than double the national average of 8%, and implied that the 20% was only an initial payment to the charity, and might later be supplemented.

20. When in June of 2010 Plaintiff Attorney General informed ACS of its concerns with deceptive fundraising calls directed to Iowans, ACS counsel insisted that “all [ACS] callers disclose paid status,” and that “callers are rigorously trained on compliance.” Counsel provided a copy of the ACS’s approved script, and that script is attached hereto as Attachment III. The two transcripts of actual solicitations (Attachments I and II) bear little resemblance to the script ACS provided the Attorney General, particularly on such key features as a caller’s disclosure that he is a professional fundraiser employed by Associated Community Services, Inc.

21. As experienced professional fundraisers, Defendants are aware that telephone solicitors are motivated to mislead would-be donors if their compensation is directly tied to success in generating donations. If, instead, the solicitors’ compensation were tied to how faithfully they adhered to the approved script, there would be no financial incentive for solicitors to deceive. Nevertheless, despite numerous run-ins with law enforcement authorities based on

deception by ACS solicitors, Defendants, upon information and belief, continue to provide financial incentives to solicitors that foreseeably result in deception (while boosting ACS's revenues).

22. After telephone solicitations like those described above, ASC sends a pledge mailing to the donor to prompt payment of the donation. However, ASC sent two separate pledge mailings in response to the April 2010 pledge, potentially prompting the donor to send twice what the donor had pledged.

23. The above-referenced pledge mailings contained information that could, if noticed and read by the donor, clear up some of the false beliefs that had been created through the phone solicitation. However, such information was presented only on the reverse side of a form, in small, gray print that would probably not be noticed and, if noticed, would be challenging to read (particularly for persons of advanced age).

24. Upon information and belief, ASC has arranged for a Des Moines-area mail drop to receive donations from Iowans, in spite of the fact that mail received at the mail drop is simply forwarded unopened to ACS. ACS incurs this avoidable expense in order to obscure the fact that donations from Iowa are actually directed to an out-of-state location, and only a fraction of sums donated ever return to Iowa.

25. Upon information and belief, older Iowans are disproportionately represented both among the recipients of ACS's solicitations and among the donors, in part because they are more likely to be home when solicitation calls are made.

26. Neither all nor any part of the application for injunctive relief herein has previously presented to and refused by any court or justice. Iowa R. Civ. P. 1.1504.

27. In an action by the state, no security is required of the state. Iowa R. Civ. P. 1.207.

COUNT I

CONSUMER FRAUD ACT VIOLATIONS

28. Paragraphs 1 through 27 are incorporated herein by reference.

29. Defendants' fundraising practices violate the prohibition of Iowa Code § 714.16 (2)(a) against misleading, deceptive, unfair, and omissive acts and practices, and otherwise violate that provision of Iowa law by making misleading representations, express and implied.

30. Although it is not necessary to establish reliance, damages or intent to deceive to obtain injunctive relief or reimbursement under the Consumer Fraud Act (*see* paragraph 8 above), establishing these factors, particularly intent, is nevertheless relevant *inter alia* to the Court's determination of the appropriate scope of injunctive relief and the appropriate amount of civil penalties. Those acts and practices of Defendants in violation of subsection (2)(a) of the Consumer Fraud Act as alleged in this Count were such as would in fact induce reliance on the part of consumer victims, would in fact cause damage to consumers (and to other charitable organizations and their beneficiaries), and/or were in fact intentional.

COUNT II

CONSUMER FRAUDS COMMITTED AGAINST OLDER PERSONS

31. Paragraphs 1 through 27 above are incorporated herein by reference.

32. On information and belief, Consumer Fraud Act violations for which the Defendants are responsible were committed against older persons and give rise to the additional civil penalty provided for in section 714.16A.

PRAYER

Plaintiff prays the Court grant the following relief:

A. Pursuant to Iowa Code § 714.16 (7), and upon further request by Plaintiff addressed to

the Court, enter a temporary restraining order and preliminary injunction restraining Defendants, and each of them, and (as applicable) each such Defendant's directors, officers, principals, partners, employees, agents, servants, representatives, subsidiaries, affiliates, successors, assigns, merged or acquired predecessors, parent or controlling entities, and all other persons, corporations and other entities acting in concert or participating with that Defendant who have actual or constructive notice of the Court's injunction, from engaging in the deceptive, misleading, omissive, and unfair practices alleged in this Petition or otherwise violating the Iowa Consumer Fraud Act, such injunctive relief to include *inter alia* a requirement that Defendants register, record all solicitation calls, and make such recordings available to the Attorney General upon request, and/or that Defendants refrain from continuing to engage in any solicitation of donations in Iowa.

B. Pursuant to Iowa Code § 714.16 (7), after trial on the merits, make permanent the above-described injunctions, expanding their provisions as necessary by including *inter alia* such "fencing in" provisions as are reasonably necessary to ensure that Defendants and other enjoined persons and entities do not return to the unlawful practices alleged herein, or commit comparable violations of law.

C. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendants, jointly and severally, for amounts necessary to restore to Iowa consumers all money acquired by means of acts or practices that violate the Consumer Fraud Act, and/or to effectuate the charitable giving intended by Iowa consumers in donating such money.

D. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendants, jointly and severally, for such additional funds as are necessary to ensure complete disgorgement of all ill-gotten gain traceable to the unlawful practices alleged herein.

E. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendants, jointly and severally, for up to \$40,000.00 for each separate violation of the Consumer Fraud Act.

F. Pursuant to Iowa Code § 714.16A, enter judgment against Defendants, jointly and severally, for an additional civil penalty not to exceed \$5,000.00 for each violation of the Consumer Fraud Act committed against an older person.

G. Award Plaintiff interest as permitted by law.

H. Pursuant to Iowa Code § 714.16 (11), enter judgment against Defendants, jointly and severally, for attorney fees, state's costs and court costs.

I. Grant such additional relief as the Court deems just and equitable.

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VIETNAM VETERANS OF IOWA

December 2009

PD: Prospective Donor

BS: Bobby Sweeney (phonetic)

BD: Brian Downs (phonetic)

DC: Denise Clifford (phonetic)

PD: Hello? Hello?

BS: Yeah [NAME]?

PD: This is [NAME].

BS: How ya doing ma'am? Bob Sweeney ACS. I was calling on behalf of the Vietnam Veterans of Iowa. How are you?

PD: Pardon me?

BS: I was calling with the Vietnam Veterans of Iowa. How are you doing?

PD: Oh, very good. And your name?

BS: My name is Bobby Sweeney, ma'am.

PD: Oh, OK.

BS: And we're helping our, our soldiers right here in Iowa at the VA hospitals. I just wanted to make ... before I go, if we mailed you our support card in about a week or so, could, you know, stick something real small in there just one time for our men and women when you receive it, would that be OK?

PD: Well, have I given before?

BS: Yeah, well it was back in 2008 though.

PD: Oh, OK. Do you know how much?

BS: Twenty dollars.

ATTACHMENT I

PD: Oh OK.

BS: Would that be OK this time?

PD: Well, where are you located?

BS: Well, we're calling from, well, Michigan but this is strictly for the Iowa soldiers.

PD: Oh, how, how does that work then? How does like, if, if you're in Michigan and I send you money, how do you know it's going, how's it going to come back to Iowa?

BS: Oh no, it doesn't come to Michigan, it goes to the, the, the office of Iowa, wait one second, I have the address.

PD: OK.

BS: Hold on, let me pull it out. Well yeah, we call, the call center is in Michigan and you know we, this is, the local program for everybody in Iowa and uh ... let's see here... Hold on one second.

PD: OK.

BS: OK. All right. Yeah, the Iowa, 'cause we actually help raise for money for the uh, VA hospitals and I know the closest one, 'cause you're in what, Des Moines? How do you pronounce it?

PD: It's Des Moines.

BS: Des Moines. OK. Yeah. Let's see here.

PD: OK.

BS: Just hold on one second.

PD: I sure will.

BS: Hello?

PD: Hello.

BS: Thanks for waiting ma'am. Thanks for wait. Yeah it's right, it's actually in Des, how do you pronounce it?

PD: Des Moines.

BS: Des Moines. It's actually in Des Moines. 400 East Bell, Des Moines, that's Iowa 5-0-3-1-5 and the number is 877-753-6268.

PD: OK.

BS: Yep.

PD: So if I were to give twenty dollars, how much of the twenty dollars would go to the veterans?

BS: The ... percentage-wise?

PD: Um hum (affirmative).

BS: Now that I have to get my manager on.

PD: OK.

BS: Hold on one second.

PD: Hello, ma'am? This is Brian Downs. How may I help you?

PD: Hi. I was just asking the gentleman, if I gave twenty, twenty dollars, how much of my twenty dollars will go to the vets?

BD: Twenty percent.

PD: Twenty percent. OK. Thank you.

BD: OK, here he is.

BS: Hello?

PD: OK. I can go ahead and do twenty then.

BS: Oh God bless you, ma'am. And everything's on file with the state attorney's office for your protection. Now when you receive it in a few weeks, ma'am, can you get it back right away or did you need extra time?

PD: I should be able to send it right away.

BS: OK great. My customer service rep's ... is on the other line. She's going make sure we don't give you a second call during the campaign, all right?

PD: OK.

BS: Now hold on one second, ma'am. Don't hang up, and have a wonderful Christmas.

PD: Well thank you, you too.

BS: Thank you.

DC: Thanks for holding [NAME].

PD: Yes.

DC: Hi there, I'm Denise Clifford with the customer service department and I just needed to confirm that you agreed to a twenty dollar donation?

PD: Yes.

DC: OK great, well, I have your name spelled [SPELLING].

PD: Yes.

DC: OK. The address [MAILING ADDRESS]?

PD: Yes.

DC: Wonderful. Now, uh, we really appreciate your support. You're going to receive your invoice and return envelope within a few days. OK?

PD: OK.

DC: And, we'd like for you to please make your check or your money order payable to the Vietnam Veterans of Iowa, Inc. and the most important part of your support is that you're able to return that twenty dollar donation within a week of receiving it. Is that comfortable for you?

PD: Yes.

DC: OK, well thank you so much. Happy holidays to you.

PD: You too. Thank you. Bye, bye.

DC: Bye.

VIETNAM VETERANS OF IOWA

April 2010

PD: Prospective Donor

ZD: Zachary Dobbins (phonetic)

A: Alexis (phonetic)

K: Keesha (phonetic)

ZD: ...Zach Dobbins here with a thank you call from the Vietnam Vets of Iowa.
How ya doing today?

PD: Very good. I'm sorry, I, I didn't catch your name?

ZD: Zachary.

PD: Zachary. OK.

ZD: Yeah, I don't mean to call you so early. We just wanted to thank you for always helping the local VA's and our local veterans here in Des Moines and uh the vets wanted me to salute you and say God bless if I could, you know, they really did love you for it, ma'am (laugh). And I did keep it down ... once a year like you had said because of all the telemarketer calls.

PD: Um hum.

ZD: And all that stuff. We make sure to call once a drive but we were just hoping to mail you the card once for 2010 for the local vets like last year. Would that be OK?

PD: Oh, so I have given before?

ZD: You said what?

PD: I have given before?

ZD: Oh yes ma'am, yeah. We mailed the card to your P. O. Box if you still have the same P. O. Box number, we mail it there, you know, every year and I'm, usually you do twenty-five bucks but we, you know we, we haven't contacted you for this year yet 'cause you know we only call, you know, once a drive so we were hoping for 2010 that'd be OK for our local vets.

PD: OK, where, where are you located then?

ZD: Well, actually our, our headquarters for the charity is here in your own city.

PD: Oh.

ZD: Our collection center for the money, though, is in Iowa City. But all the money stays local for the veterans here in Iowa.

PD: OK.

ZD: 'Cause the headquarters for the, you know, the charity, charity, Vietnam Vets of Iowa is here in town.

PD: Well, I know I can't do twenty-five, um

ZD: Or we, mail it for whatever, it...

PD: OK. Um ... I'm going to say fifteen, but can you tell me, of the fifteen dollars how much will go to the homeless vets?

ZD: Well this, oh, how much goes, goes, where would it, do you mean if, if your fifteen dollars is going to the veterans?

PD: Uh hum.

ZD: Yeah.

PD: Can you tell me how much though. Does all fifteen dollars go to them?

ZD: Oh you mean a per ... overhead percentage. Ah, well I, I mean I know we use some of the money to pay the phone bill and keep the lights on but my, my helper's right beside me. I know he knows the exact number. Do you mind if I had him the phone?

PD: Of course not. Thank you.

ZD: I just don't want to tell you a wrong number. All right?

PD: Oh, OK.

ZD: Here she comes right now.

PD: OK, thank you.

A: Hi, sorry about your hold, this is Alexis. I heard you had a question?

PD: Yes. I was just asking the gentleman if I gave fifteen dollars, how much of my fifteen, I mean, how much of my fifteen dollars would go to the homeless vets.

A: Yeah. We still keep what, we give over double the nation's average which is sadly right now is only eight percent. We do twenty and then the eighty percent left over is administrative as well as for the fundraising for the whole year for them.

PD: OK. So only twenty percent goes to them?

A: Immediately, yeah.

PD: OK, well, I can still go ahead and, and do that then.

A: OK, now what do you, what were you comfortable doing?

PD: Only fifteen.

A: I'm sorry?

PD: Fifteen.

A: OK, now just so we don't go bugging you twice, do you mind if we double check the address with you real quick?

PD: Of course.

A: You are an angel. Hold on one second OK?

K: Hello?

PD: Hi.

K: Hi, sorry for the delay, [NAME]. This is Keesha with the verification department. How much did you promise to donate?

PD: Fifteen.

K: Great. Are you still at [MAILING ADDRESS] and this is in [CITY AND ZIP]?

PD: Yes.

K: OK, you will receive your invoice and return envelope in a few days. Make your check or money order payable to the Vietnam Vets of Iowans. Can you return this back within a week after receiving it?

PD: Yes.

K: Great. Well we want to thank you so much for your support. Have a good day.

PD: You too.

K: Bye.

PD: Bye, bye.

Vietnam Veterans of Iowa Presentation

CALLER WARNING

You are required by law to say the first two sentences word for word without any changes. Failure to do so and you are committing a crime. Violators will be terminated immediately.

Hello Mr. or Mrs. (customer's last name), this is (your full name) working for Associated Community Services. I am a professional fundraiser calling on behalf of the Vietnam Veterans of Iowa. How are you? Great to hear. / Sorry to hear that.

I am calling to let you know that Vietnam Veterans of Iowa is currently working on helping those veterans that are in need the most. It could be the homeless, the troubled, the sick, or even an over looked veteran that just needs a helping hand to get them through the day. These veterans should never be forgotten for what they have done for our country. That is why we are calling; to make sure that these veterans can count on your support to fight this battle. Can we count on you?

If yes - Great! The support is up to you. We are asking concerned residents like you to help with a \$35 pledge. Would that be okay with you?

If yes close

If no - Mr. or Mrs. (customer's last name), that's okay, more people feel comfortable doing \$20. Is that affordable for you?

If yes close

If no - Well Mr. or Mrs. (customer's last name), everything will add up to help keep this program running. Our small one is \$12. Would that be affordable for you?

If yes close

If no – Thank you for your time and have a wonderful day!!

Close

Great Mr. or Mrs. (customer's last name), are you still receiving your mail at (street address)? We'll send you a two part slip for the \$__ along with a letter of thanks. Keep one half of the slip for your records and send the other halfback along with a check or money order for the \$__ in the return envelope that we provide. Is there any way that you could return the \$__ back within a week after you receive it? Are there any further questions that I can answer for you? Thank you for your support and have a wonderful day!!