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ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of

COMPLIANCE EDUCATORS, LLC
dba DotService.com,
and DOT Compliance Group,

and

SCOTT RISTER,

Respondents.

The office of the Iowa Attorney General and the above-named Respondents hereby agree as follows:

This Assurance of Voluntary Compliance (“Assurance”) constitutes a full and final resolution of any and all claims by the Iowa Attorney General against Respondents for alleged violations of the Iowa Consumer Fraud Act, Iowa Code § 714.16 (“CFA”) that occurred or may have occurred prior to the effective date of this Assurance and that were raised by the Attorney General in the investigation and/or resolution of this matter.

Nothing contained herein may be taken as or construed to be an admission or concession of any violation of law or of any other matter of fact or law, or of any liability or wrongdoing, all of which Respondents expressly deny. No part of this Assurance constitutes or shall be deemed to constitute an admission by Respondents that they have ever engaged in any conduct proscribed by this Assurance or failed to comply with any federal or state statute or regulation or the common law, and no payment required by this Assurance shall be deemed a penalty. This Assurance shall take effect when the last signature below is added (the “Effective Date”).



IT IS THEREFORE AGREED that Respondents, whether through principals, employees, agents, servants, representatives, subsidiaries, affiliates, successors, or assigns, or through any other persons acting in concert with or participating with Scott Rister, shall refrain as of the Effective Date from the lease, sale, advertisement, or other marketing of any nature of any merchandise (as defined at Iowa Code § 714.16(1)(i), which includes but is not limited to “intangibles” and “services”) to Iowa residents or from an Iowa location.

IT IS FURTHER AGREED that Respondents shall provide a prompt refund of any previously-unrefunded payments made to Compliance Educators, LLC (or any dba thereof) by any Iowa resident since January 1, 2016, the sum of which totals \$14,850.00, in the manner instructed by the Attorney General. The \$14,850.00 sum reflects 150 transactions for \$99.00 each. The payment schedule shall be as follows:

- 1) \$4,950.00 paid to the Attorney General on or before Friday, June 1, 2018;
- 2) \$4,950.00 paid to the Attorney General on or before Monday, July 2, 2018; and
- 3) \$4,950.00 paid to the Attorney General on or before Friday, August 3, 2018.

The Attorney General shall issue the refunds directly to applicable Iowa consumers. If any amount is left after the Attorney General reasonably attempts to issue all of the refunds, the remainder shall be deposited into the consumer fraud enforcement fund referred to in Iowa Code § 714.16C.

IT IS FURTHER AGREED that Respondents shall comply with reasonable requests from the Attorney General for information relating to compliance with this Assurance and/or for information relating to possible refunds to customers.

IT IS FURTHER AGREED that Respondents shall refrain from selling, renting, sharing,

transferring, making available for use by others, or making any other use whatsoever of the names and/or other identifying or personal information of persons with Iowa addresses who previously responded to solicitations from Respondents.

IT IS FURTHER AGREED that nothing herein shall be interpreted to create any private right of action for consumers that would not otherwise exist, nor to diminish any rights or remedial options available to consumers that would otherwise exist (except as necessary to prevent double recovery by an individual consumer). Nothing contained in this Assurance shall be construed to waive any individual right of action by a consumer or a local, state, federal or other governmental entity.

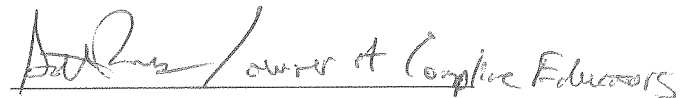
IT IS FURTHER AGREED that, in addition to whatever other legal remedies may be available, a material violation of this Assurance constitutes a violation of the Consumer Fraud Act, Iowa Code § 714.16 (CFA), and each such violation by a Respondent of this Assurance, if established by a preponderance of the evidence in an enforcement action by the Attorney General, gives rise to all of the remedies provided in the CFA.

IT IS FURTHER AGREED that, pursuant to Iowa Code § 714.16, Respondents pay to the Attorney General \$7,000.00 in the manner instructed by the Attorney General, such sum to be deposited in the consumer fraud enforcement fund referred to in Iowa Code § 714.16C. The payment schedule shall be:


- 1) \$2,333.00 paid to the Attorney General on or before Friday, June 1, 2018;
- 2) \$2,333.00 paid to the Attorney General on or before Monday, July 2, 2018; and
- 3) \$2,334.00 paid to the Attorney General on or before Friday, August 3, 2018.

The undersigned, who have the authority to consent and sign on behalf of Respondents and the Attorney General of Iowa, hereby consent to the form and contents of this Assurance.

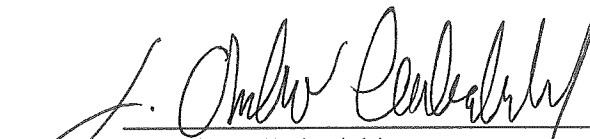
Date: 5-23-18


Compliance Educators, LLC
dba DOTservice.com
and DOT Compliance Group

Date: 5-23-18


Scott Rister

Date: 5/29/2018


J. Andrew Cederdahl
Assistant Iowa Attorney General