

ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of:

**Saguaro, Roddy Hunter and
Franklin Schaffer**

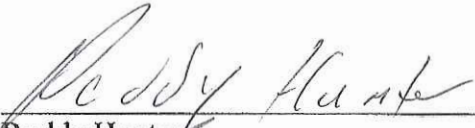
Respondents.

The above-named Respondents enter into this Assurance of Voluntary Compliance (AVC) in order to resolve concerns of the Iowa Attorney General relating to direct mail solicitations that pre-date this AVC that purport to provide work-at-home programs to Iowans sufficient to enable them to generate substantial monthly income, which solicitations the Attorney General regards as deceptive and unfair.

Respondents, and each of them, agree: (1) to refrain from engaging or participating, directly or indirectly, in any form of solicitation or communication that (a) is directed to residents of Iowa, or is conducted in whole or in part from an Iowa location, and (b) involves the marketing of information or materials described as enabling the recipient to achieve a substantial monthly income, or involves other deceptive and/or unfair conduct; (2) to provide an itemized list of all Iowa customers' names, addresses, and amounts paid, accompanied by payment to the Attorney General of a dollar amount sufficient to permit full refunds to everyone on such list, with any undistributed funds going into the Older Iowans Fund (Iowa Code § 714.16 (A)); (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 cease all marketing efforts to residents of Iowa; (5) 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 (6) that any future violation of this AVC shall constitute a violation of the Iowa Consumer Fraud Act, Iowa Code § 714.16, and that any such violation shall give rise to civil penalties and other remedies as set forth in that law and other applicable law.

Date:

10-14-16


Roddy Hunter

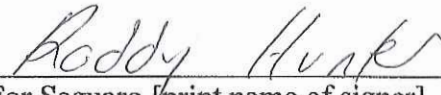
Date:

10/14/16


Franklin Schaffer

Date:


10-14-16


For Saguaro [print name of signer]

Accepted by:

Date:

10-25-16


Steve St. Clair

Assistant Iowa Attorney General