

ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of

Tactical Marketing, Inc. (a Florida corporation)

and

Raymond Jastrzemski,

Respondents.

The undersigned state and agree as follows:

1. The State of Iowa *ex rel.* Thomas J. Miller, Iowa Attorney General, enters into this Assurance of Voluntary Compliance ("Assurance") with Tactical Marketing, Inc. and Raymond Jastrzemski ("Respondents") to resolve the Attorney General's concerns regarding Respondents' compliance with Iowa Code § 714.16, the Iowa Consumer Fraud Act ("CFA"), the Older Iowans Act, Iowa Code § 714.16A ("OIA"), and the Prize Promotions Law, Iowa Code § 714B ("PPL") (together, "Iowa's Consumer Laws"), in connection with Respondents' advertising and sale of reports, newsletters or the like identifying various sweepstakes, games, and contests which recipients may wish to enter ("Sweepstakes Report Marketing").

2. Respondents have agreed to enter into this Assurance in order to resolve all issues raised during the Attorney General's inquiry into Respondents' Sweepstakes Report Marketing. Respondents are entering into this Assurance solely for the purposes of settlement and 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 deny.

3. The Effective Date of this Assurance is the date of the last signature below.

IT IS THEREFORE AGREED that Respondents and Respondents' employees, successors and assigns shall cease as of the effective date of this Assurance all Sweepstakes Report Marketing directed to residents of Iowa or conducted from an Iowa location.

IT IS FURTHER AGREED that Respondents and Respondents' employees, successors, and assigns shall immediately cease billing Iowa residents for any Sweepstakes Report Marketing that occurred at any time prior to the effective date of this Assurance.

IT IS FURTHER AGREED that Respondent and Respondent's employees, successors, and assigns shall comply with Iowa's Consumer Laws in connection with any marketing to Iowa residents.

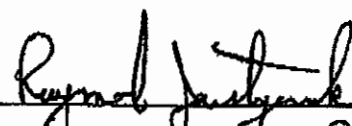
IT IS FURTHER AGREED that Respondents pay to the State of Iowa the sum of \$600,00, to be applied by the Attorney General in its discretion to making refunds to past Iowa customers Respondents have identified to the Attorney General. Respondents agree to cooperate with reasonable requests from the Attorney General for last known contact information (full name, mailing or billing address, email address, and telephone number) and prior payment and refund information for Iowa residents in connection with efforts to effect such payments. To the extent that consumers eligible for payments cannot be located through reasonable efforts, the money that is not paid to consumers shall be retained by the Attorney General to be used by the Attorney General for the administration and implementation of the CFA, pursuant to Iowa Code § 714.16(7), and shall be deposited into the fund created by Iowa Code § 714.16A (2013). In addition, Respondents shall make best efforts to provide refunds to any other Iowa customers who request a refund.

IT IS FURTHER AGREED that a violation of this Assurance is deemed a violation of the CFA for purposes of enforcement by the Attorney General, and that in any enforcement action in an Iowa District Court in which one or more violations of this Assurance are established by the Attorney General by a preponderance of the evidence, the Court shall apply the remedies provided in the CFA, in addition to any other remedies provided by law. Respondents shall cooperate with reasonable requests from the Attorney General for information relating to compliance with this Assurance, and/or relating to the manner in which Sweepstakes Report Marketing has been conducted; provided, however, that this cooperation requirement shall not limit the Attorney General's investigative or other powers under the law.

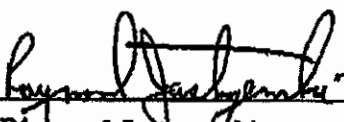
IT IS FURTHER AGREED that this Assurance constitutes a complete settlement and release by the State of Iowa of all claims against Respondents for violation of Iowa's Consumer Laws arising out of Sweepstakes Report Marketing to residents of Iowa that occurred before the Effective Date.

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.

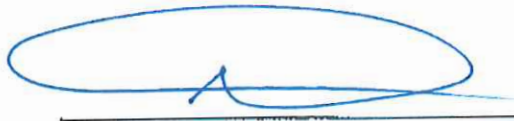
Date: 5-28-15


Tactical Marketing, Inc., by Raymond Jastrzemski
President

Date: 5-28-15


Raymond Jastrzemski

Date: 6/4/15



Gordon Koegler
Attorney for Respondents

Date: 6/15/15



Steve St. Clair
Assistant Attorney General