

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

CONSUMER EDUCATION.INFO, INC. also d/b/a Consumer Education Outreach, a Missouri corporation;

EPATH LIVE LLC, a Missouri limited liability corporation;

WEBNET CONSULTING INC. also d/b/a ePath Media, a California corporation;

DHM MEDIA CORP., a Colorado corporation;

WILLIAM R. BASKIN, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach, ePath Live LLC and WebNet Consulting Inc. also d/b/a ePath Media,

JEREMY BUTTKE, individually and as an officer of Consumer Education.info, Inc. also d/b/a

Consumer Outreach, ePath Live LLC and WebNet Consulting Inc. also d/b/a ePath Media,

TETSUYA KOSAKA, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach, ePath Live LLC and WebNet Consulting Inc. also d/b/a ePath Media

and

JEFFREY L. RANDOL, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach and of ePath Live LLC and as an officer and sole shareholder of DHM Media Corp.

Defendants.

**STIPULATED FINAL ORDER FOR PERMANENT INJUNCTION AND CIVIL
PENALTY JUDGMENT**

Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“FTC” or “Commission”), filed its Complaint for Civil Penalties, Permanent Injunction, and Other Relief (“Complaint”) in this matter, pursuant to Sections 5(a), 5(m)(1)(A), 13(b), 16(a), and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), 56(a), and 57b, and

Section 6 of the Telemarketing and Consumer Fraud and Abuse Prevention Act (the “Telemarketing Act”), 15 U.S.C. § 6105. Defendants have waived service of the summons and the Complaint. Plaintiff and Defendants stipulate to the entry of this Stipulated Final Order for Permanent Injunction and Civil Penalty Judgment (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants engaged in acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the FTC’s Telemarketing Sales Rule (the “TSR” or “Rule”), as amended, 16 C.F.R. Part 310, in the Telemarketing of their products and services.
3. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.
4. Defendants waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to bear their own costs and attorneys’ fees. Defendants waive and release any claims that they may have against Plaintiff, the Commission, and their agents that relate to this action.
5. Defendants and Plaintiff waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

For the purpose of this Order, the following definitions apply:

- A. **“Caller Identification Service”** means a service that allows a telephone subscriber to have the telephone number, and, where available, name of the calling party transmitted contemporaneously with the telephone call, and displayed on a device in or connected to the subscriber’s telephone.
- B. **“Defendants”** means the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination.
1. **“Corporate Defendants”** means Consumer Education.info, Inc. also d/b/a Consumer Outreach, ePath Live LLC, WebNet Consulting Inc. also d/b/a ePath Live, DHM Media Corp. and their successors and assigns.
2. **“Individual Defendants”** means William R. Baskin, Jeremy Buttke, Tetsuya Kosaka and Jeffrey L. Randol.
- C. **“Do Not Call Request”** means that person previously has stated that he or she does not wish to receive an Outbound Telephone Call made by or on behalf of the seller whose goods or services are being offered or made on behalf of the charitable organization for which a charitable contribution is being solicited.
- D. **“Entity-Specific Do Not Call List”** means a list of telephone numbers maintained by a Seller or Telemarketer of persons who have previously stated that they do not wish to receive Outbound Telephone Calls made by or on behalf of the Seller whose goods or services are being offered or made on behalf of the charitable organization for which a charitable contribution is being solicited.
- E. **“Established Business Relationship”** means a relationship between a Seller and a consumer based on: (a) the consumer’s purchase, rental, or lease of the Seller’s goods or

services or a financial transaction between the Seller and consumer, within the eighteen months immediately preceding the date of the Telemarketing call; or (b) the consumer's inquiry or application regarding a product or service offered by the Seller, within the three months immediately preceding the date of a Telemarketing call.

F. **“Lead Generation”** means providing, in exchange for consideration, consumer information to a Seller or Telemarketer in connection with Telemarketing.

G. **“National Do Not Call Registry”** means the “do-not-call” registry of telephone numbers maintained by the Commission pursuant to 16 C.F.R. § 310.4(b)(1)(iii)(B).

H. **“Outbound Telephone Call”** means a telephone call initiated by a Telemarketer to induce the purchase of goods or services or to solicit a charitable contribution.

I. **“Representatives”** means Defendants' officers, agents, servants, employees and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise.

J. **“Seller”** means any person who, in connection with a Telemarketing transaction, provides, offers to provide, or arranges for others to provide goods or services to the customer in exchange for consideration, whether or not such person is under the jurisdiction of the Commission.

K. **“Signature”** shall include an electronic or digital form of signature, to the extent that such form of signature is recognized as a valid signature under applicable federal or state contract law.

L. **“Telemarketer”** means any person who, in connection with Telemarketing, initiates or receives telephone calls to or from a customer or donor, whether or not such person is under the jurisdiction of the Commission.

M. “**Telemarketing**” means a plan, program, or campaign which is conducted to induce the purchase of goods or services or a charitable contribution, by use of one or more telephones and which involves more than one interstate telephone call.

ORDER

I. PROHIBITION AGAINST ABUSIVE TELEMARKETING PRACTICES

IT IS ORDERED that, in connection with Telemarketing, Defendants and their Representatives, whether acting as a Seller or Telemarketer, are permanently restrained and enjoined from engaging in, causing others to engage in, or assisting and facilitating others engaging in, any of the following practices:

- A. Initiating any Outbound Telephone Call to any person at a telephone number on the National Do Not Call Registry, unless the Seller or Telemarketer can demonstrate that:
 - 1. The Seller has obtained the express agreement, in writing, of such person to place calls to that person. Such written agreement shall clearly evidence such person’s authorization that calls made by or on behalf of that Seller may be placed to that person, and shall include the telephone number to which the calls may be placed and the Signature of that person; or
 - 2. The Seller has an Established Business Relationship with such person, and that person has not stated that he or she does not wish to receive Outbound Telephone Calls made by or on behalf of the Seller.

- B. Initiating any Outbound Telephone Call to a person when that person has previously stated that he or she does not wish to receive an Outbound Telephone Call:
 - 1. Made by or on behalf of the Seller whose goods or services are being offered; or

2. Made on behalf of a charitable organization for which a charitable contribution is being solicited.
- C. Initiating any Outbound Telephone Call to a telephone number within a given area code unless the Seller, either directly or through another person, has paid the annual fee for access to the telephone numbers within that area code that are included in the National Do Not Call Registry, unless the Seller or Telemarketer can demonstrate that the Seller initiates, or causes the Telemarketer to initiate, calls that are solely:
1. Solicitations to induce charitable contributions;
 2. To a business;
 3. To persons who have given the Seller their express agreement, in writing and signed, to receive calls from the Seller; or
 4. To persons who have an Established Business Relationship with the Seller.
- D. Initiating any Outbound Telephone Call that delivers a prerecorded message, unless the Seller or Telemarketer can demonstrate that:
1. Prior to making any such call to induce the purchase of any good or service, the Seller has obtained from the recipient of the call an express agreement, in writing, that:
 - a. The Seller obtained only after a clear and conspicuous disclosure that the purpose of the agreement is to authorize the Seller to place prerecorded calls to such person;
 - b. The Seller obtained without requiring, directly or indirectly, that the agreement be executed as a condition of purchasing any good or service;

- c. Evidences the willingness of the recipient of the call to receive calls that deliver prerecorded messages by or on behalf of the specific Seller; and
 - d. Includes such person's telephone number and Signature; and
2. In any such call to induce the purchase of any good or service, or to induce a charitable contribution from a member of, or previous donor to, a non-profit charitable organization on whose behalf the call is made, the Seller or

Telemarketer:

- a. Allows the telephone to ring for at least fifteen (15) seconds or four (4) rings before disconnecting an unanswered call; and
- b. Within two (2) seconds after the completed greeting of the person called, plays a prerecorded message that promptly and in a clear and conspicuous manner discloses to the person receiving the call: (i) the identity of the Seller or the charitable organization; (ii) that the purpose of the call is to sell goods or services or solicit a charitable donation: and (iii) if the purpose of the call is to sell goods or services, the nature of the goods or services, followed immediately by a disclosure of one or both of the following:

- i. In the case of a call that could be answered in person by a consumer, that the person called can use an automated interactive voice and/or keypress-activated opt-out mechanism to assert a Do Not Call Request at any time during the message. The mechanism must:

- a. Automatically add the number called to the Seller's Entity-Specific Do Not Call List;
 - b. Once invoked, immediately disconnect the call; and
 - c. Be available for use at any time during the message; and
- ii. In the case of a call that could be answered by an answering machine or voicemail service, that the person called can use a toll free-number to assert a Do Not Call Request. The number provided must connect directly to an automated interactive voice or keypress-activated opt-out mechanism that:
- a. Automatically adds the number called to the Seller's Entity-Specific Do Not Call List;
 - b. Immediately thereafter disconnects the call; and
 - c. Is accessible at any time throughout the duration of the Telemarketing campaign.

E. Initiating any Outbound Telephone Call in which the Telemarketer fails to disclose truthfully, promptly, and in a clear and conspicuous manner to the person receiving the call:

1. Defendants' identity;
2. the identity of the Seller whose goods or services are being offered for sale or the charitable organization on behalf of which a request for a charitable contribution is being made;
3. that the purpose of the call is to sell goods or services or solicit a charitable contribution; and

4. if the purpose of the call is to sell goods or services, the nature of the goods or services.
- F. Initiating any Outbound Telephone Call in which the Seller or Telemarketer fails to transmit or cause to be transmitted to any Caller Identification Service in use by a recipient of a Telemarketing call either:
1. the Telemarketer's telephone number and, when made available by the Telemarketer's carrier, the name of the Telemarketer making the call; or
 2. the name of the Seller or charitable organization on behalf of which a telemarketing call is placed, and that Seller's or charitable organization's customer or donor service telephone number, which is answered during regular business hours.
- G. Violating the Telemarketing Sales Rule, 16 C.F.R. Part 310, attached as Appendix A.

**II. MONETARY JUDGMENT FOR
CIVIL PENALTY AND PARTIAL SUSPENSION**

IT IS FURTHER ORDERED that:

A. Judgment is hereby entered in favor of the Commission and against Defendants, jointly and severally, in the amount of two million, three hundred thirty-nine thousand, six hundred eighty-seven dollars (\$2,339,687) as a civil penalty; provided that this judgment will be satisfied upon the Defendants' full compliance with the conditions set forth in this Section.

B. The Defendants are ordered to pay to the Plaintiff the sum of one hundred thousand dollars (\$100,000) as follows:

1. Within ninety (90) days of entry of this Order, the Defendants shall pay to Plaintiff, by electronic fund transfer in accordance with instructions

provided by a representative of Plaintiff, the sum of fifty thousand dollars (\$50,000).

2. Within one hundred eighty (180) days of entry of this Order, the Defendants shall make a second payment to Plaintiff, by electronic fund transfer in accordance with instructions provided by a representative of Plaintiff, of fifty thousand dollars (\$50,000).
3. In the event that the Defendants fail to make a required payment when due, or the Commission is not allowed to retain any payment, the entire judgment amount, less any amount paid by the Defendants, shall immediately become due and payable as to all of the Defendants. Interest computed from date of entry of this Order at the rate prescribed under 28 U.S.C. §1961, as amended, shall immediately begin to accrue on the unpaid balance. Time is of the essence for the payments specified in this Section.
4. Notwithstanding the foregoing, the Defendants shall have the right to prepay at any time, and without penalty, the remaining balance due to the Commission under this order. Any such prepayment made prior to either installment due date shall be credited as if made on the next installment due date, and Defendants shall be relieved of making any further payments on the installment due date for any prepayments to the extent of such prepayment. Nothing herein shall be construed to relieve Defendants of their obligation to make timely payment for any installments, as they become due, which have not otherwise been paid fully in advance.

5. Upon completion of such payments, the remainder of the judgment is suspended, subject to the Subsections below.

C. The Commission's and Plaintiff's agreement to the suspension of part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of Defendants' sworn financial statements and related documents (collectively, "financial representations") submitted to the Commission beginning in January 2016 including but not limited to:

1. The Financial Statement of Individual Defendant William R. Baskin signed on January 22, 2016, including all attachments and supplements;
2. The Financial Statement of Individual Defendant Jeremy Buttke signed on January 19, 2016, including all attachments and supplements;
3. The Financial Statement of Individual Defendant Tetsuya Kosaka originally submitted in January 2016 and re-signed on June 7, 2016, including all attachments and supplements;
4. The Financial Statement of Individual Defendant Jeffrey L. Randol signed on January 16, 2016, including all attachments and supplements;
5. The Financial Statement of Corporate Defendant Consumer Education Info, Inc. signed by Jeffrey L. Randol, secretary, on March 1, 2016, including all attachments and supplements;
6. The Financial Statement of Corporate Defendant ePath Live, LLC signed by Jeffrey L. Randol, secretary, on March 1, 2016, including attachments and supplements;

7. The Financial Statement of Corporate Defendant WebNet Consulting, Inc. signed by William R. Baskin, CEO, on March 1, 2016, including all attachments and supplements; and
8. The Financial Statement of Corporate Defendant DHM Media Inc. signed by Jeffrey L. Randol, President on February 28, 2016, including all attachments and supplements.

D. The suspension of the judgment will be lifted as to any Defendant if, upon motion by the Commission or Plaintiff, the Court finds that Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the financial representations identified above.

E. If the suspension of the judgment is lifted, the judgment becomes immediately due as to one or multiple Defendants, as appropriate, in the amount specified in Subsection A above (which the parties stipulate only for purposes of this Section represents the amount of the civil penalty for the violations alleged in the Complaint), less any payment previously made pursuant to this Section, plus interest computed at the rate prescribed under 28 U.S.C. § 1961, as amended, from the date of entry of this Order.

F. Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order and may not seek the return of any assets.

G. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission, including in a proceeding to enforce its rights to any payment or monetary judgment pursuant to this Order, such as a nondischargability complaint in any bankruptcy case.

H. Defendants agree that the judgment represents a civil penalty owed to the government of the United States, is not compensation for actual pecuniary loss, and, therefore, as to the Individual Defendants, it is not subject to discharge under the Bankruptcy Code pursuant to 11 U.S.C. § 523(a)(7).

I. Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Numbers or Employer Identification Numbers), which Defendants must submit, may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

III. COOPERATION

IT IS FURTHER ORDERED that each of the Defendants must fully cooperate with representatives of Plaintiff and the Commission in this case and in any investigation related to or associated with the transactions or the occurrences that are the subject of the Complaint. Such Defendants must provide truthful and complete information, evidence, and testimony. Individual Defendants must appear and Corporate Defendants must cause their officers, employees, Representatives, or agents to appear for interviews, discovery, hearings, trials, and any other proceedings that a Plaintiff or Commission representative may reasonably request upon five days' written notice, or other reasonable notice, at such places and times as a Plaintiff or Commission representative may designate, without the service of a subpoena.

IV. ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that the Defendants obtain acknowledgments of receipt of this Order:

A. Each Defendant, within seven days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For five years after entry of this Order, each Individual Defendants for any business that he, individually or collectively with any other Defendant, is the majority owner or controls directly, or indirectly, and which engages directly or indirectly in Lead Generation or Telemarketing, and each Corporate Defendant, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, and other Representatives who participate in conduct related to Lead Generation or Telemarketing; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within seven days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which a Defendant delivered a copy of this Order, that Defendant must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

V. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Defendants make timely submissions to the Commission:

A. One year after entry of this Order, each Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission and Plaintiff may use to communicate with Defendant; (b) identify all of that Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which Individual Defendant must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how that Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.
2. Additionally, each Individual Defendant must: (a) identify all telephone numbers and all physical, postal, email and Internet addresses, including all residences; (b) identify all business activities, including any business for which he performs services whether as an employee or otherwise and any entity in which he has any ownership interest; and (c) describe in

detail his involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

B. For ten years after entry of this Order, each Defendant must submit a compliance notice, sworn under penalty of perjury, within fourteen days of any change in the following:

1. Each Defendant must report any change in: (a) any designated point of contact; or (b) the structure of Corporate Defendant or any entity that Defendant has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.
2. Additionally, each Individual Defendant must report any change in:
 - (a) name, including aliases or fictitious name, or residence address; or
 - (b) title or role in any business activity, including any business for which he performs services whether as an employee or otherwise and any entity in which he has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.

C. Each Defendant must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such Defendant within fourteen days of its filing.

D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct. Executed on: _____” and supplying the date, signatory’s full name, title (if applicable), and signature.

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: FTC v. Consumer Education.Info, Inc., Matter Number 1523081.

VI. RECORDKEEPING

IT IS FURTHER ORDERED that Defendants must create certain records for ten years after entry of the Order, and retain each such record for five years. Specifically, each Corporate Defendant, in connection with Lead Generation and Telemarketing, and each Individual Defendant for any business that he, individually or collectively with any other Defendants, is a majority owner or controls directly or indirectly, and which engages in Lead Generation or Telemarketing, must create and retain the following records:

- A. accounting records showing the revenues from all goods or services sold;
- B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person’s: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. records of all consumer complaints concerning the subject matter of the Order, whether received directly or indirectly, such as through a third party, and any response;
- D. all records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission; and

E. all records relating to businesses providing dialing services from whom Defendants were provided consumer telephone numbers, including contracts with such dialing services.

VII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with this Order, including the financial representations upon which part of the judgment was suspended and any failure to transfer any assets as required by this Order:

A. Within fourteen days of receipt of a written request from a representative of the Commission or Plaintiff, each Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. The Commission and Plaintiff are also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission and Plaintiff are authorized to communicate directly with each Defendant. Defendant must permit representatives of the Commission and Plaintiff to interview any employee or other person affiliated with any Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission and Plaintiff may use all other lawful means, including posing, through its representatives as consumers, suppliers, or other individuals or entities, to Defendants or any individual or entity affiliated with Defendants, without the necessity of identification or

prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

D. Upon written request from a representative of the Commission or Plaintiff, any consumer reporting agency must furnish consumer reports concerning Individual Defendants, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

VIII. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED, this ____ day of _____, 2016.

United States District Judge

SO STIPULATED AND AGREED:


FOR PLAINTIFF:

THE UNITED STATES OF AMERICA

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General
Civil Division
U.S. DEPARTMENT OF JUSTICE

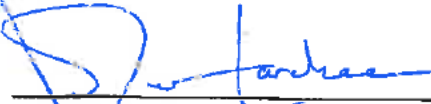
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FEDERAL TRADE COMMISSION

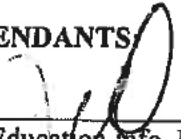


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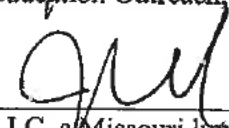
Dated

FOR DEFENDANTS


Consumer Education Info, Inc. also d/b/a
Consumer Education Outreach, a Missouri
corporation

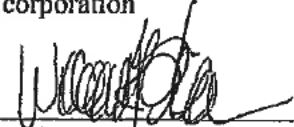
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Dated


ePath Live LLC, a Missouri limited liability
corporation

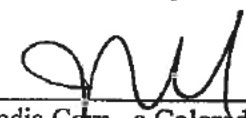
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Dated


WebNet Consulting Inc. also d/b/a ePath
Media, a California corporation


6/9/16

Dated


DHM Media Corp., a Colorado corporation


6-13-16

Dated


William R. Baskin


6/9/16

Dated


Jeremy Butke

6/9/16


Dated



Tetsuya Kosaka

6/9/2016

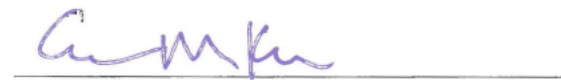
Dated



Jeffrey L. Randol

6-13-16

Dated



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Dated