



- 2 -

individually or in combination."

2. Defendants deny wrongdoing or liability of any kind, but have agreed to entry of this Consent Judgment in order to resolve the dispute with Plaintiff. This Consent Judgment shall not be used as evidence of wrongdoing or liability on the part of Defendants.

3. The Court has jurisdiction of the parties and subject matter.

4. Defendants waive personal service of the Petition herein and acknowledge receipt of a copy of this Consent Judgment.

5. The Court finds that this Consent Judgment should be entered.

**IT IS THEREFORE ORDERED** pursuant to Iowa R. Civ. P. 1.1501 *et seq.* and Iowa Code §§ 714.16 (7) and 714B.7 (2003) that Defendants and their principals, employees, agents, servants, representatives, subsidiaries, affiliates, successors, assigns, parent or controlling entities, and all other persons, corporations and other entities acting in concert or participating with Defendants who have actual or constructive notice of the Court's injunction are enjoined from directly or indirectly: conveying commercial solicitations of any nature to persons with Iowa addresses; conveying, from an Iowa location, commercial solicitations of any nature to persons with addresses outside of Iowa; using an Iowa location or mailing address as a return address in connection with any commercial solicitation of any nature; and failing to remove all Iowa addresses from all customer, lead and/or prospect lists in the possession or under the control of Defendants and to keep such lists free of such addresses. Provided, however, that Defendants shall not be deemed to have violated the foregoing injunction to the extent that an act or practice involves e-mail lists of persons whose state of residence is not known or readily ascertainable by Defendants.

**IT IS FURTHER ORDERED** that, in the event Defendants fail to abide by the injunctive provisions of this Consent Judgment, Plaintiff may, in addition to pursuing whatever other remedies are available under the law, seek and obtain a judgment against the violating

- 3 -

Defendant(s), for a civil penalty (or civil penalties) in the total amount of \$360,000.00 pursuant to one or more of the civil penalty provisions of the Iowa laws set forth in paragraph 1 above.

**IT IS FURTHER ORDERED** that Defendants pay to Plaintiff \$75,000.00 to be deposited into the Elderly Victim Fund created by Iowa Code § 714.16A (1) (2003).

**IT IS FURTHER ORDERED** that this Consent Judgment resolves all matters and claims alleged by Plaintiff, or which could have been alleged based on the facts known to Plaintiff, under the Iowa laws set forth in paragraph 1 above for conduct which took place prior to the execution of this Consent Judgment, and that Plaintiff hereby releases Defendants and (as applicable) their officers, directors, and employees from any and all such claims.

**IT IS FURTHER ORDERED** that the Court retains jurisdiction for purposes of enforcing this Consent Judgment.

**IT IS FURTHER ORDERED** that Defendants pay the court costs herein.

*1st Robt B. Hawran*  
JUDGE, Fifth Judicial District

Approved:

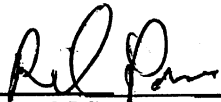
*Richard J. Panas*  
Richard J. Panas, Individually

Date: 4-27-04


*Richard J. Panas*  
Richard J. Panas, for  
RP Associates, Inc.

Date: 4-27-04

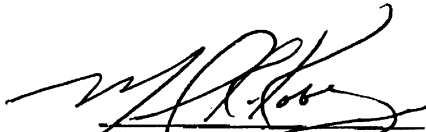
- 4 -

  
Richard J. Panas, for  
L.I. Printing, Inc.


Date: 4-27-04

  
Richard J. Panas, for  
Leisure International, Inc.

Date: 4-27-04

  
Michael R. Kobienz  
Counsel for Defendants

Date: 4/28/2004

  
Steve St. Clair  
Assistant Iowa Attorney General

Date: 4-29-04