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OFFICE OF THE ATTORNEY GENERAL
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March 12, 2021

DEAN G. MARSHLACK
Centurion Filing Services, LLC DBA "Vermont Certificate Service"
2312 4th Street North, Suite 104
St. Petersburg, FL, 33704

Re: *Deceptive Solicitation "2020 Certificate of Good Standing Request Form"*

VIA CERTIFIED MAIL

Mr. Marshlack:

We have been made aware that your Limited Liability Corporation "VT Certificate Service" has been mailing a form to Vermont residents titled "2020 Certificate of Good Standing Request Form". The layout, formatting, and language used on this form would lead a reasonable consumer to incorrectly believe that this form is from the State of Vermont and/or the Vermont Secretary of State, and that there is a "Certificate of Good Standing Fee" due in the amount of \$87.50 from the recipient of the form, whose business information is pre-printed on the form. These deceptive acts, practices, and representations violate Vermont's Consumer Protection Act, 9 V.S.A. § 2453.

Your deceptive statements include but are not limited to:

- The statement: "Congratulations on registering your Business with the State of Vermont. Your Articles have been filed with the Secretary of State and are complete."
- The statement "You have one step left..."
- A lengthy paragraph at the center of the form printed in tiny point-size, with one sentence at the center of the paragraph in bold stating, "Please confirm the accuracy of the information below."

- Only one fine point-size sentence on the entire form offers a disclaimer describing this form as a solicitation; this sentence surrounded by a paragraph-long official description of the Certificate of Good Standing, its possible uses, and that it “...bears the official seal of the Vermont Secretary of State.”
- The name of the fee listed on the form “Certificate of Good Standing Fee”.
- Creating a false sense of urgency and officiality by use of the terms “Notice Date:” and “Please Respond By:” and by using “VT” in the footer references.
- Using a Burlington, VT mailing address

These statements are misleading and deceptive and constitute violations of the Vermont Consumer Protection Act.

Your mailings also violate the Attorney General’s Consumer Protection Rule 120.07, which prohibits companies from using a Vermont address in connection with an offering of services that are actually provided outside of Vermont. Violations of the Attorney General’s Consumer Protection Rules also constitute violations of the Vermont Consumer Protection Act.

The penalty for violating Vermont’s Consumer Protection Act is up to \$10,000 per violation, where each advertisement mailed to each Vermont consumer may be considered a separate violation.

We demand that you immediately cease engaging in all deceptive acts and practices. If you have any questions, please call my office, or contact me at christopher.curtis@vermont.gov.

Sincerely,

/s/ Christopher Curtis

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General
State of Vermont