

STATE OF VERMONT

**SUPERIOR COURT
WASHINGTON UNIT**

**CIVIL DIVISION
DOCKET NO.**

STATE OF VERMONT,)
)
 Plaintiff,)
)
 v.)
)
 KARABELL INDUSTRIES, LLC, and)
 ELI B. KARABELL,)
)
 Defendants.)

CONSENT JUDGMENT AND ORDER

NOW COME the parties who wish to resolve the above-standing litigation and hereby agrees as follows:

1. Defendants shall refrain from engaging in any business in Vermont, including without limitation, telemarketing business in Vermont.
2. Defendants shall refrain from contacting any Vermont residents, including legislators, for any solicitations, sales, or offers of Defendants' services.
3. In the event that Defendants violate this Judgment Order, then Defendants shall be liable for and shall pay to the State of Vermont a stipulated penalty of \$10,000 for each violation.
4. The State's claims set forth in the Complaint are resolved in their entirety.
5. The Judgment will, upon its Effective Date, constitutes a fully binding and enforceable agreement between the Parties and the Parties consent to its entry as a final judgment by the Court.

6. This Judgment, which constitutes a continuing obligation, is binding upon the State and Defendants, and any of Defendants' respective successors, assigns, or other entities or persons otherwise bound by law.
7. The Court shall have continuing jurisdiction to enforce this Injunction at any time, including *sua sponte* or upon request by the parties.
8. Any violation of this Injunction shall be deemed to be a violation of a judicial order, and may result in the imposition of injunctive relief and/or penalties, including penalties for contempt, as set forth in 10 V.S.A. Chapters 201 and 211.

AGREED TO BY THE PARTIES:

Dated: March 25, 2022

STATE OF VERMONT

THOMAS J. DONOVAN JR.
ATTORNEY GENERAL




By:

Justin Kolber
Assistant Attorney General
Office of Attorney General
109 State Street
Montpelier, Vermont 05609
justin.kolber@vermont.gov
(802) 828-3171

FOR DEFENDANTS:

March 29, 2022

KARABELL INDUSTRIES, LLC
ELI B. KARABELL

By:  ^{EBK}
[name and title] MANAGER / OWNER
Authorized Agent for Defendants

SO ORDERED and ENTERED.

Dated at Montpelier, Vermont this 30th day of March, 2022.



Hon. Judge Robert Mello
Superior Court Judge