

**STATE OF VERMONT
SUPERIOR COURT
WASHINGTON UNIT**

IN RE: Centurion Filing Services) CIVIL DIVISION
) Docket No. _____
)

ASSURANCE OF DISCONTINUANCE

Vermont Attorney General Thomas J. Donovan, Jr. (“the Attorney General”) and Centurion Filing Services, LLC d/b/a VT Certificate Service (“Respondent” or “Centurion”) hereby agrees to this Assurance of Discontinuance (“AOD”) pursuant to 9 V.S.A. § 2459.

REGULATORY FRAMEWORK

1. Vermont’s Consumer Protection Act prohibits “[u]nfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce.” 9 V.S.A. § 2453.

BACKGROUND

2. Respondent Centurion is a limited liability corporation incorporated under the laws of Florida, with its principal place of business located at 2312 4th Street North, Suite 104, St. Petersburg, FL 33704.

3. In late November 2020, Respondent began sending mailings to businesses that had recently registered to do business in Vermont. An example of these mailings is attached at Exhibit A.

4. Respondent’s mailings solicited the newly registered businesses to pay Centurion in exchange for Centurion sending the business a Certificate of Good Standing, obtained from the Vermont Secretary of State.

5. The Vermont Secretary of State offers Certificates of Good Standing to any business that requests them for \$25. Centurion charged consumers \$87.50.

6. Respondent admits the truth of the facts set forth in paragraphs 2-5 of the Background section.

7. The Attorney General alleges that Centurion's mailings were deceptive and misleading, creating the false impressions that businesses were required to purchase a Certificate of Good Standing and that the mailing was an official mailing from the State of Vermont, when in fact they were solicitations for services.

8. The Attorney General alleges that the above conduct constitutes unfair and deceptive acts and practices under 9 V.S.A. § 2453.

INJUNCTIVE RELIEF

9. Respondent agrees to refrain from sending any mailings to Vermont consumers in the future.

10. Respondent shall comply with all provisions of Vermont law, including but not limited to provisions of 9 V.S.A. §§ 2451-2480.

RESTITUTION

11. Respondent shall pay full refunds to all Vermont consumers who request a refund within 90 days of the date of execution of this Assurance. Vermont consumers may submit their request for a refund to the Vermont Attorney General's Office, which will transmit all requests received to Respondent by the end of the 90-day period. Respondent shall pay refunds to each Vermont consumer within 30 days of receiving the requests.

PENALTIES

12. Respondent shall pay civil penalties of \$20,000 on or before June 30, 2022. Respondent shall make payment to the "State of Vermont" and send payment to: James

Layman, Assistant Attorney General, Office of the Attorney General, 109 State Street,
Montpelier, Vermont 05609.

OTHER TERMS

13. Respondent agrees that this Assurance of Discontinuance shall be binding on Respondent, and their successors and assigns.

14. The Attorney General hereby releases and discharges any and all claims arising under the Consumer Protection Act, 9 V.S.A. §§ 2451-2480, that it may have against Respondent for the conduct described in the Background section between the dates of November 1, 2020 through the date of execution of this Assurance.

15. The Superior Court of the State of Vermont, Washington Unit, shall have jurisdiction over this Assurance and the parties hereto for the purpose of enabling the Attorney General to apply to this Court at any time for orders and directions as may be necessary or appropriate to enforce compliance with or to punish violations of this Assurance of Discontinuance.

16. Acceptance of this Assurance by the Vermont Attorney General's Office shall not be deemed approval by the Attorney General of any practices or procedures of Respondent not required by this Assurance, and Respondent shall make no representation to the contrary.

STIPULATED PENALTIES

17. If the Superior Court of the State of Vermont, Washington Unit, enters an order finding Respondent to be in violation of this Assurance of Discontinuance, then the parties agree that penalties to be assessed by the Court for each act in violation of this Assurance of Discontinuance shall be \$10,000.

NOTICE

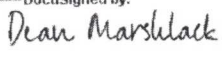
18. Respondent may be located at: c/o Coats Schmidt, P.A. – 4055 Central Avenue, St. Petersburg, FL 33713

19. Respondent shall notify the Attorney General of any change of business name or address within 20 business days.

SIGNATURE

In lieu of instituting an action or proceeding against Respondent, the Office of the Attorney General, pursuant to 9 V.S.A. § 2459, accepts this Assurance of Discontinuance. By signing below, Respondent voluntarily agrees with and submits to the terms of this Assurance of Discontinuance.

DATED at 5/11/2022, this day of , 2022.

DocuSigned by:

336ACD922F60423


Dean Marshlack
managing member

ACCEPTED on behalf of the Attorney General:

DATED at Montpelier, Vermont this 18 day of May, 2022.

STATE OF VERMONT

THOMAS J. DONOVAN, JR.
ATTORNEY GENERAL

By: 

James Layman
Assistant Attorney General
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