

IN THE CIRCUIT COURT OF FAULKNER COUNTY, ARKANSAS
CIVIL DIVISION

STATE OF ARKANSAS, *ex rel.*
LESLIE RUTLEDGE,
ATTORNEY GENERAL

PLAINTIFF

v.

CASE NO. _____

PASSIONATE MINDS
FOUNDATION INC.,
AUTHENTIC VISUALS
PRODUCTIONS LLC,
SCOTTIE D. LACKLAND,
VALENTINA LACKLAND,
SCOTTIE D. LACKLAND II,
and
SYDNEY LACKLAND

DEFENDANTS

COMPLAINT

The State of Arkansas, *ex rel.* Leslie Rutledge, Attorney General (“the State”), for its Complaint against Passionate Minds Foundation Inc., Authentic Visuals Productions LLC, Scottie D. Lackland, Valentina Lackland, Scottie D. Lackland II, and Sydney Lackland, states:

I. INTRODUCTION

1. This is a consumer protection action brought to redress and restrain violations of the Arkansas Deceptive Trade Practices Act (“ADTPA”), Ark. Code Ann. § 4-88-101 *et seq.*

2. Defendants created and operated a fraudulent pyramid scheme in the form of an investment “game” called Passionate Minds Circle of Wealth. To participate in the “game,” participants were required to send \$500.00 via Cash App to Defendants and invite their friends and family to do the same. Defendants promised participants a 700% return on investment in four weeks. Defendants enlisted administrators to market and run the “games.” Administrators received \$200.00 from each player for his or her services. Participants stopped receiving payouts while Defendants used participants’ money to enrich their own bank accounts, pay off debt, and purchase luxury goods and services such as plastic surgery.

3. The State seeks an injunction, restitution for affected consumers, an order imposing civil penalties, and other relief against Defendants.

II. PARTIES

4. Plaintiff is the State of Arkansas, *ex rel.* Leslie Rutledge, Attorney General. Attorney General Rutledge is the chief legal officer of the State. Pursuant to Ark. Code Ann. § 4-88-104 and 4-88-113, the State may seek civil enforcement of the ADTPA.

5. Defendant Passionate Minds Foundation Inc. (“PMF”) is a non-profit corporation organized in Arkansas on January 4, 2012. Its registered agent is United States Corporation Agents, Inc., 900 SE 5th Street, Suite 22, Bentonville, Arkansas 72712.

6. Defendant Authentic Visuals Productions LLC (“AVP”) is a limited liability company organized in Arkansas on November 18, 2018. Its registered agent is Scottie Lackland II, 2270 Meadowlake Road, Apartment 206, Conway, Arkansas 72032.

7. Defendant Scottie D. Lackland (“Lackland”) is an individual and resides at 605 N. River Bend Drive in Marion, Arkansas. He serves as a corporate director for PMF.

8. Defendant Valentina Lackland (“V. Lackland”) is an individual and resides at 605 N. River Bend Drive in Marion, Arkansas. She is married to Defendant Lackland.

9. Defendant Scottie D. Lackland II (“Lackland II”) is an individual and resides at 2915 Gladstone Drive in Conway, Arkansas. He is employed as a police officer for the Little Rock Police Department. He is the son of Defendant Lackland. Defendant Lackland II serves as a corporate director for PMF and as a member of AVP.

10. Defendant Sydney Lackland (“S. Lackland”) resides at 605 N. River Bend Drive in Marion, Arkansas. She is the adult daughter of Defendant Lackland.

III. JURISDICTION

11. This Court has jurisdiction over this matter pursuant to Ark. Code Ann. § 4-88-104 and the common law of the State of Arkansas.

12. Venue is proper pursuant to Ark. Code Ann. §§ 4-88-104, 4-88-112, and the common law of the State of Arkansas.

IV. BACKGROUND

13. As the coronavirus pandemic began to affect the health and livelihoods of Arkansans in early 2020 and economic panic set in, the State became aware of a scam specifically targeting the Arkansas African-American community. The scam, which is actually a pyramid scheme, is known under various names such as “Blessing Loom,” “Circle Game,” “Money Board,” “Mandala Game,” “Blessing Circle,” and “Infinity Loom.” Other names for it include “Community of Wealth” and “Black Wall Street.”

14. Administrators of the “game” typically solicit participants to join by using phrases like *community spirit*, *shared economy*, *gifts*, or *easy money*. They present the “game” as an exclusive opportunity. They promise participants a big return for a small investment.

15. This scheme imitates an ancient type of informal savings club known as a “sou sou,” which has roots in West Africa and the Caribbean. It is a savings arrangement between a small group of friends or family who regularly pay a fixed amount into a common fund and take turns receiving a payout. In a “sou sou,” participants do not earn interest, do not take out more than they put in, and do not receive rewards for recruiting other members.

16. In modern times, participants of these fake “sou sou” savings clubs use a digital payment service, such as Cash App, to contribute funds to the “game.”

17. A new recruit sends money to a person in the center of a playing board. An administrator then places the new recruit in one of eight spots on the outer ring

of the board. The new recruit moves toward the center of the board as other players join. As the number of recruits increases, the board changes and the number of playing boards expands. When the new recruit lands in the center of the playing board, he or she expects to receive a “cash blessing” from other players in an amount significantly more than was contributed. However, for the initial eight players on the outer ring of the circle to receive their payout, each player has to recruit eight people, those eight people have to recruit eight individually, and those eight have to recruit eight more each. That is a total recruitment of 4,096 people for the initial group to receive a payout. In this same scheme, the fifteenth generation requires 35,184,372,088,832 new entries to guarantee a payout. The pyramids collapse long before then because the growth rate is untenable.

18. Like other types of pyramid schemes, these “games” depend on recruiting new people to keep money flowing into the game. There are no products sold or real investments creating profits. Once participants run out of new recruits to bring into the “game,” the money dries up.

V. FACTUAL ALLEGATIONS

19. On January 4, 2012, Defendant Lackland organized Passionate Minds Foundation as a non-profit corporation.¹

¹ See the documents and records maintained by the Arkansas Secretary of State, which are attached as Exhibit A.

20. On May 15, 2020, a private group was created² on Facebook called “Passionate Minds Circle of Wealth.” As of August 24, 2020, the group had over 7,300 members. The group’s Facebook administrators included Shantell Lackland, Sydney Lackland, Verna Goss Seawood, Kaylon D. Johnson, Crystal Jones, and Scottie Lackland.³

21. Prior to the creation of the Facebook page, Defendants communicated with participants using GroupMe, a group text messaging app.

22. On June 1, 2020, passionateminds.org was registered as an internet domain name. The website remains active.

23. The launch page of the website includes a disclaimer, which states “Presentation to be Used & Shared By Passionate Minds Members Only.”

24. Defendant AVP produced⁴ a video entitled “Passionate Minds Presentation,” which was published to passionateminds.org and is publically available for viewing despite the “members only” disclaimer.

25. Consumers also report seeing the presentation on YouTube, but the video is no longer accessible from that platform.

² Facebook deleted the content of the private group on or about September 4, 2020, presumably for violating its terms of agreement.

³ See the screenshot of the Facebook “About this Group” page showing the group’s administrators as of August 24, 2020, attached as Exhibit B.

⁴ See the source code from the Passionate Mind’s website that clearly shows the embedded video is titled “Passionate Minds – Circle of Wealth Presentation from Authentic Visuals Productions on Vimeo,” which is attached as Exhibit C.

26. The website and video presentation introduce consumers to “Passionate Minds Circle of Wealth,” Defendants’ version of the “game” described above.

27. The video begins with a “Legal Disclaimer,” which states as follows:

“THIS PRESENTATION IS NOT WRITTEN BY LEGAL OR ACCOUNTING EXPERTS AND IN NO WAY SHOULD BE TAKEN AS THE DELIVERY OF LEGAL OR ACCOUNTING ADVICE. PASSIONATE MINDS IS NOT THE ORIGINATOR, CREATOR OR OWNER OF THIS PLATFORM.

THIS PRESENTATION IS FOR THE SOLE PURPOSE OF PROVIDING INFORMATION THAT WAS SHARED WITH US. IT IS NOT OUR INTENTION TO CONVINCe ANYONE TO PARTICIPATE. WE ARE SIMPLY SHARING THE PLATFORM DETAILS FOR THOSE WHO ARE INTERESTED.”⁵

28. The video describes PMF as one that was “created by like-minded individuals who sought to build a community focused on economic opportunity and growth” and supportive of “the economic, motivational, and spiritual needs of everyone who joins the group.”

29. The presentation, touting its incorporation “by the State of Arkansas,” sets out PMF’s mission to be “a collective body of diverse cultures seeking to bless others.” Members must be “trustworthy, passionate, positive and maintain a hard work ethic.” The group has a stated goal to “see members gain financial freedom and provide networking opportunities to make careers and dreams come true!” Its motto, announced in the presentation with an excited, emotional female voice, is “One Body, One Mind, Moving Together!”

⁵ See a screenshot of minute 00:20 of the “Passionate Minds Presentation,” which is attached as Exhibit D.

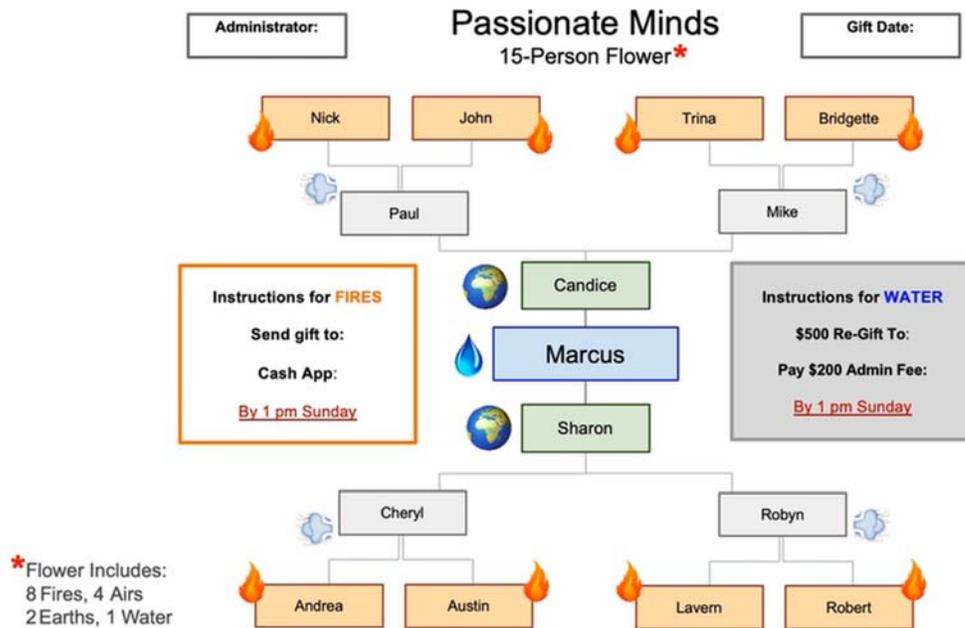
30. The presentation describes the scheme as a new version of a “sou sou,” with improved attributes such as “no holder of the money,” “one-time contribution only,” “4-week cycle period,” “gift is greater than what is gifted,” and “residual gifts.” The voice-over in the presentation sympathetically remarks, “We all want to create residual income.”

31. The “game” operates on a four week rotation:

- a. Week 1 players are “Fire.” During this week, players give \$500 to the organization.
- b. In week 2, the “Fire” players become “Air” and are told to invite family and friends to join the process.
- c. “Air” players become “Earth” in week 3 and are told to “Support Your Community” and make sure family and friends are sharing this opportunity with other people.
- d. Finally, in week 4, “Earth” players become “Water” and are “gifted a \$4,000 potential gift.” The Water players are then instructed⁶ to “re-gift \$500” and pay an “admin fee” of \$200, leaving the player with a net “\$3,300 total blessing.”

32. The video describes how players rotate through the game board, or “Flower,” depicted below, as well as how the “Flower” splits into multiple game boards.

⁶ See an example of the “Gifting & Regifting” instructions, attached as Exhibit E.



33. Players contribute \$200.00 to PMF’s Administrators for building “Flowers,” sending weekly communications to players, answering questions, troubleshooting issues, developing supporting documentation, attending meetings, and repairing “Flowers” – all in an effort to make the process “smooth” for the players.

34. Administrators maintain “working hours” during which players can contact them for “insight regarding flower rebuilding,” and “flower system changes.”

35. The Administrators’ communications are designed to motivate participants and potential recruits with uplifting presentations about how their involvement will help build wealth in their communities.

36. PMF implies to participants that the “blessings” received are gifts, and therefore are not taxable.

37. PMF requires players to have a Cash App account to “send and receive gifts” and to provide PMF with their “full name, Cash App name, phone number, email address and emergency contact.”

38. After watching the video, would-be participants complete and submit “Passionate Minds Family & Friends Share Plan: Inquiry,”⁷ a Google document that includes instructions and questions such as:

- a. “You may enter as a fire as many times as you’d like. \$500 entry fee is required for each spot and will be due the Sunday you enter the flower as a fire(s). There will be a \$200 admin fee due upon every payout.”
- b. “What date do you want to enter Passionate Minds II?”
- c. “[What is your] “Cash App” [username?”

39. From January to August 2020, Defendant Lackland received \$90,513.00 from consumers via Cash App into Regions Checking Account XXXXX4001.⁸ During the same time frame, Defendant Lackland:

- a. Withdrew \$10,225.00 in cash;
- b. Transferred \$10,000.00 into Business Savings Account XXXXX2200 held at Regions in the name of Jace Adjusting;
- c. Transferred \$28,169.00 into Regions Savings Account XXXXX2822 held by Defendants Lackland and V. Lackland;

⁷ See a copy of the “Passionate Minds Family & Friends Share Plan: Inquiry,” which was obtained on October 13, 2020, and attached as Exhibit F.

⁸ See a copy of monthly account statements for Regions Lifegreen Checking Account XXXXX4001, attached as Exhibit G.

- d. Transferred \$23,501.00 into Regions Savings Account XXXXX5936 held by Defendants V. Lackland and Lackland;
- e. Made payments totaling \$19,860.23 to Capital One for credit card payments;
- f. Made payments totaling \$7,528.51 to student loans; and
- g. Put down \$3,391.00 as a deposit to build a fence.

40. From January to August 2020, Defendant V. Lackland received \$81,601.12 from consumers via Cash App into Regions Checking Account XXXXX7568.⁹ During the same time frame, Defendant V. Lackland:

- a. Transferred \$6,700.00 to Regions Savings Account XXXXX2822 held by Defendants Lackland and V. Lackland;
- b. Transferred \$2,850.00 to Regions Savings Account XXXXX0566;
- c. Transferred \$2,000.00 to Regions Savings Account XXXXX8251;
- d. Transferred \$2,900.00 to Regions Savings Account XXXXX8278;
- e. Transferred \$3,500.00 to Regions Savings Account XXXXX5936 held by Defendants V. Lackland and Lackland;
- f. Made payments totaling \$6,218.56 to Ally Financial;
- g. Made payments totaling \$15,048.84 to student loans;
- h. Made payments totaling \$3,582.00 to Arkansas State University; and
- i. Spent \$13,178.00 in miscellaneous shopping expenses.

⁹ See copies of the monthly account statements for Regions Lifegreen Checking Account XXXXX7568, attached as Exhibit H.

41. From January to August 2020, Defendant Lackland II received \$74,373.32 from consumers via Cash App into Regions Checking Account XXXXX3757.¹⁰ During that same time frame, Defendant Lackland II:

- a. Transferred \$30,395.60 to Regions Savings Account XXXXX2213 held by Defendant Lackland II;
- b. Transferred \$15,008.00 to Regions Savings Account XXXXX2221 held by Defendant Lackland II;
- c. Transferred \$3,900.00 to USAA accounts held by Defendant Lackland II;
- d. Made payments totaling \$5,120.45 to a Barclay credit card account;
- e. Made payments totaling \$17,823.80 to a credit card account;
- f. Made payments totaling \$7,698.52 to Chase;
- g. Made payments totaling \$8,205.83 to Synchrony Bank; and
- h. Spent \$1,584.32 at a bicycle shop in Conway, Arkansas.

42. From January to August 2020, Defendant S. Lackland received \$73,641.00 from consumers via Cash App into Regions Checking Account XXXXX5036.¹¹ During that same time period, Defendant S. Lackland:

- a. Transferred \$61,299.83 into Regions Savings Account XXXXX6967;
- b. Made payments totaling \$2,839.62 to a Barclay credit card account;

¹⁰ See copies of monthly account statements for Regions Lifegreen Checking for Students Account XXXXX3757, attached as Exhibit I.

¹¹ See copies of monthly account statements for Regions Lifegreen Checking for Students Account XXXXX5036, attached as Exhibit J.

- c. Made payments totaling \$3,829.34 to Best Buy; and
- d. Paid \$12,000.00 for plastic surgery in July.

43. PMF holds both a checking and savings account at Regions with Defendant Lackland as the signatory. From May to September 2020, \$110,822.48 was deposited into Regions Checking Account XXXXX7960.¹² Of that amount, Defendant Lackland transferred \$79,900.00 into Regions Savings Account XXXXX8677¹³ and transferred \$13,200.00 into his personal checking and savings accounts at Regions.

44. On July 5, 2020, one Administrator sent a group email to her “PM family” notifying the recipients that they “did not hit our goal” and thanking them for their “willingness to sacrifice for the sake of your fellow members.” She reduced the payouts to \$3,000.00 and reduced administration fees to \$100.00. Then, the email recipients were told they would transition into the next game position “without paying an additional gift.” The email closed with “Thank you all again for your patience and cooperation. I love you with the love of Christ...and may God continue to bless you all richly.”¹⁴

¹² See copies of monthly account statements for Regions Lifegreen Not For Profit Checking Account XXXXX7960, attached as Exhibit K.

¹³ See copies of monthly account statements for Regions Business Savings Account XXXXX8677, attached as Exhibit L.

¹⁴ See the group email from passionatemindsffspzelliesmith@gmail.com, dated July 5, 2020, attached as Exhibit M.

45. In late July 2020, consumers were told that “[Defendant Lackland] put the whole community on hold as of 7/20.”¹⁵

46. By August, the money had dried up and consumers began fervently questioning the Administrators of the “Flowers” they had joined. One consumer received the following text message from her Administrator indicating no one was holding any money and there were no refunds available:

“Mia, as you know we all sent out gifts to the person in water. No one is holding money for or from anyone – so there are no refunds.

Unfortunately, the admins had no forewarning of what was to happen, and like you I gifted in the cycle as well, actually 6 times.

I am just waiting, hoping that things will mesh out and get back on track.

Scottie Lackland is the founder of PM, you can attempt to reach him via messenger – but I don’t even have Contact info for him.

I’m watching the Facebook group intently in hopes of better news soon.”¹⁶

47. Defendant S. Lackland posted on Facebook in early September in response to a consumer’s demands for a refund:

“You’re constantly emailing me love. I don’t want to argue. I wasn’t even going to respond but you were so pressed for a response, constantly stalking and finding ways to contact me, so I gave it to you.

The organization was very legal. Attorneys and judges looked over every agreement and piece of documentation before it was put out. They assured the founder that it was 100% legal and one of THE most legal organizations out there. I am not worried. My major is in broadcast journalism so I know all about how the news works so we will see.

¹⁵ See the screenshot of a text message between “Temaka Admin” and “Mia” dated July 26, 2:30 PM, attached as Exhibit N.

¹⁶ See the screenshot of a text message between “Temaka Admin” and “Mia,” attached as Exhibit O.

I'm sorry that someone told you to join something that you knew nothing about or that it was a risk and you did it anyway. That is why we told everyone to watch the video before they signed up. Have a blessed and safe Labor Day weekend love.”¹⁷

48. On September 9, 2020, one consumer created a Facebook group to publicly discuss financial losses due to Passionate Minds Circle of Wealth. Over 90 members have joined the “Fraud – Passionate Minds Friends and Family Flowers 1 and 2.”

49. Consumers complain that they were never paid as represented by Defendants. When consumers questioned Defendants, they stopped returning calls and stopped communicating with them.

VI. VIOLATIONS OF LAW

50. The ADTPA sets forth the State’s statutory program prohibiting deceptive and unconscionable trade practices.¹⁸

51. The business practices of Defendants constitute the sale of “goods” or “services.”¹⁹ The same business practices constitute business, commerce, or trade.²⁰

52. It is unlawful to “knowingly make a false representation as to the characteristics, ingredients, uses, benefits, alterations, source, approval, or

¹⁷ See a screenshot of Sydney Lackland’s Facebook post, attached as Exhibit P.

¹⁸ Ark. Code Ann. §§ 4-88-101, *et seq.*

¹⁹ Ark. Code Ann. § 4-88-102(4) and (7).

²⁰ Ark. Code Ann. § 4-88-107.

certification of goods or services....”²¹ Defendants have engaged in prohibited conduct by misrepresenting:

- a. That payouts from a giving circle, blessing game, or similarly operating scheme will be delivered and failing to deliver the payout; and
- b. That the “game” will benefit the community.

53. The law prohibits the use of “concealment, suppression, or omission of any material fact with the intent that others rely upon the concealment, suppression, or omission” while selling any goods or services.²² Defendants have engaged in prohibited conduct by:

- a. Implying its activity is sanctioned by the State of Arkansas;
- b. Inviting consumers to participate in an arrangement in which Defendants have reason to know will not result in a payout for all participants as advertised;
- c. Representing that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, by falsely representing to consumers that participation in an organization will confer upon them a right to receive monetary payouts;
- d. Representing that an agreement confers or involves rights, remedies, or obligations which are prohibited by law by inviting consumers to

²¹ Ark. Code Ann. § 4-88-107(a)(1).

²² Ark. Code Ann. § 4-88-108(2).

participate in a pyramid scheme, investment opportunity, or charity program that is prohibited by law;

- e. Failing to inform consumers of the accurate chances of a payout or award in any pyramidal scheme, investment opportunity, or charity game; and
- f. Misstating legal definitions and concepts to consumers.

54. “Pyramid promotional scheme” means any plan or operation through which a person gives consideration for the opportunity to receive compensation primarily from the introduction of other persons into the plan or operation rather than from the sale and consumption of goods, services, or intangible property by a participant or other persons introduced into the plan or operation.²³

55. It is unlawful to promote any pyramid promotional scheme.²⁴

Defendants have engaged in prohibited conduct by:

- a. Soliciting funds from consumers for the opportunity to receive funds;
- b. Encouraging plan participants to invite other consumers to participate in the plan;
- c. Operating a plan through which consumers paid money for the opportunity to receive compensation rather than from the sale and consumption of goods, services, or intangible property.

²³ Ark. Code Ann. § 4-88-109(b)(9)(A).

²⁴ Ark. Code Ann. § 4-88-109(a).

56. It is a violation to engage in unconscionable, false, or deceptive acts or practices in business, commerce, or trade.²⁵ Defendants have engaged in prohibited conduct by:

- a. Deceiving consumers into investing their money into a plan that functioned solely as an engine of fraud and caused significant economic damage to the affected consumers; and
- b. Converting consumers' funds and utilizing those funds to enrich Defendants at the expense of consumers.

PRAYER FOR RELIEF

57. The Attorney General may bring a civil action to seek to prevent persons from engaging in the use or employment of prohibited practices.²⁶

58. Likewise, the Attorney General may bring a civil action to seek to restore to any purchaser who has suffered any ascertainable loss by reason of the use or employment of the prohibited practices any moneys or real or personal property which may have been acquired by means of any practices declared to be unlawful, together with other damages sustained.²⁷

59. The Attorney General may seek an injunction prohibiting any person from engaging in any deceptive or unlawful practice.²⁸

²⁵ Ark. Code Ann. § 4-88-107(a)(10).

²⁶ Ark. Code Ann. § 4-88-113(a)(1).

²⁷ Ark. Code Ann. § 4-88-113(a)(2)(A).

²⁸ Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1).

60. Any person who violates the provisions of the ADTPA may be assessed a civil penalty of up to \$10,000 per violation.²⁹

61. In addition, any person who violates the provisions of the ADTPA shall be liable to the Office of the Attorney General for all costs and fees, including but not limited to, expert witness fees and attorney's fees, incurred by the Office of the Attorney General in the prosecution of such actions.³⁰

62. The Defendants' assets are subject to the equitable remedy of disgorgement, which is the forced relinquishment of all benefits that would be unjust for the Defendants to retain, including all ill-gotten gains and benefits or profits that resulted from the Defendants putting fraudulently converted property to a profitable use.

63. A "person" is an individual, organization, group, association, partnership, corporation, or any combination thereof.³¹

64. Defendant PLM is a "person" who has engaged in an unconscionable, false, or deceptive act or practice in business, commerce, or trade.

65. Defendant AVP is a "person" who has engaged in an unconscionable, false, or deceptive act or practice in business, commerce, or trade.

66. The State will exercise its right to a trial by jury.

²⁹ Ark. Code Ann. § 4-88-113(a)(3).

³⁰ Ark. Code Ann. § 4-88-113(e).

³¹ Ark. Code Ann. § 4-88-102(5).

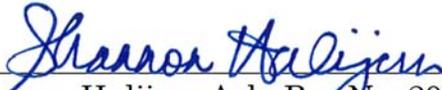
WHEREFORE, the above premises considered, the State of Arkansas, *ex rel.*

Leslie Rutledge, Attorney General, respectfully requests that this Court:

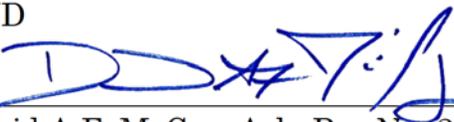
- a. Issue such orders, pursuant to Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1), as may be necessary to prevent the use or employment by the Defendants of the practices described herein which are violations of the ADTPA;
- b. Issue an order, pursuant to Ark. Code Ann. § 4-88-113(a)(2)(A), requiring Defendants to pay consumer restitution to those Arkansas consumers affected by the activities outlined herein; in addition, or in the alternative, enter an order requiring Defendants to remit to affected consumers all sums obtained from Arkansas consumers by methods prohibited by Arkansas law;
- c. Impose civil penalties pursuant to Ark. Code Ann. § 4-88-113(b), to be paid to the State by the Defendants in the amount of \$10,000.00 per each violation of the ADTPA proved at a trial of this matter, the full amount of which will exceed the amount necessary to establish federal diversity jurisdiction;
- d. Order the disgorgement of Defendants' assets, as provided by law;
- e. Issue an order, pursuant to Ark. Code Ann. § 4-88-113(e), requiring Defendants to pay the State's costs in this investigation and litigation, including, but not limited to, attorneys' fees and costs; and
- f. For all other just and proper relief to which the State may be entitled.

Respectfully submitted,

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