

STATE OF INDIANA
IN THE MARION COUNTY _____ COURT

MISCELLANEOUS DOCKET NUMBER _____

IN RE: Voyager International, Ltd., and
Gilford Mahaffy,

Respondents.

**PETITION TO APPROVE
ASSURANCE OF VOLUNTARY
COMPLIANCE**

The Petitioner, State of Indiana, by the Office of the Indiana Attorney General, by Deputy Attorney General Erica Sullivan, petitions the Court to approve an Assurance of Voluntary Compliance (“Assurance”) between the parties pursuant to Indiana Code § 24-5-0.5-7.

The parties agree to enter into the Assurance without any adjudication of fact or law. The Assurance is attached and marked as Exhibit A.

WHEREFORE, the Petitioner requests the Court approve the Assurance of Voluntary Compliance between the parties and for all other just and proper relief.

Respectfully submitted,

THE OFFICE OF THE INDIANA
ATTORNEY GENERAL TODD ROKITA

By: /s/ Erica S. Sullivan
Erica S. Sullivan
Deputy Attorney General
Attorney Number 29504-49

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above Petition to Approve Voluntary Compliance was mailed by United States mail, first class postage prepaid, this 19th day of February 2021, to the following:

Voyageurs International, Ltd.

Gilford Mahaffey

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