

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE  
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

STATE OF TENNESSEE *ex rel.* HERBERT H. )  
SLATERY III, Attorney General and Reporter, )

Plaintiff, )

v. )

WALKER STALKERS, LLC, a domestic )  
limited liability company, d/b/a )  
FAN FEST, LLC )

and )

JAMES FRAZIER, individually and d/b/a )  
Walker Stalkers, LLC, )

Defendants. )

Case No. 20-0195-IV

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**CIVIL ENFORCEMENT COMPLAINT**

The State of Tennessee brings this civil enforcement action against Defendants to stop the unfair or deceptive business practices of Walker Stalkers, LLC, which sells tickets to events scheduled in cities across the United States and in London, United Kingdom, where actors from the show “The Walking Dead” and other celebrities are invited to meet and greet fans. Defendants sold tickets for events in 2019, unilaterally cancelled or delayed the events at the last minute, and then systematically and deliberately refused to refund money owed to consumers after falsely assuring them that the refunds would be coming. Many consumers who purchased tickets for Walker Stalkers’ 2019 events remain unrefunded, and these consumers may never see their refunds absent this Court’s intervention.

The State of Tennessee brings this enforcement proceeding in its sovereign capacity, by and through Herbert H. Slatery III, Attorney General and Reporter, pursuant to the Tennessee Consumer Protection Act (TCPA), Tennessee Code Annotated §§ 47-18-101 to -131, to obtain injunctive relief, restitution, disgorgement of ill-gotten gains, and other equitable and statutory relief for Defendants' acts and practices.

1. Pursuant to Tennessee Code Annotated § 47-18-108(a)(2), more than ten days before instituting this proceeding, the Attorney General gave notice of the State's intention to initiate this action under the TCPA to Defendant James Frazier and gave him an opportunity to present reasons why this proceeding should not be instituted.

2. Pursuant to Tennessee Code Annotated § 47-18-108(a)(3), the Division of Consumer of Affairs, within the Tennessee Attorney General's Office, certifies that it has complied with Tennessee Code Annotated § 47-18-5002(2) and provided copies of all complaints to Defendants and given them an opportunity to respond.

#### **THE PARTIES**

3. Plaintiff, the State of Tennessee, through the Attorney General, is authorized by Tenn. Code Ann. §§ 47-18-108 and -114 and his powers at common law to obtain injunctive relief, rescission or reformation of contracts, disgorgement of ill-gotten gains, and other equitable and statutory relief for Defendants' acts and practices in violation of the TCPA.

4. Defendant Walker Stalkers, LLC (Walker Stalkers) is a Tennessee domestic limited liability company (SOS Control No. 000722246 and BID No. 37112495) formed in June 2013, with a principal business address of 3517 Robbins Nest Road, Thompson's Station, TN 37179-5469.

5. Defendant James Frazier is an individual who resides at 3517 Robbins Nest Road, Thompson's Station, TN 37179-5469. At all relevant times, James Frazier has owned, operated, and/or managed Walker Stalkers and has participated in its day to day activities, including the conduct alleged in this complaint. James Frazier is currently the sole member and owner of Walker Stalkers.

### **JURISDICTION AND VENUE**

6. This Court has subject matter jurisdiction pursuant to Tennessee Code Annotated § 16-11-101, § 47-18-108, and -114.

7. Venue is proper in Davidson County pursuant to Tennessee Code Annotated § 47-18-108(a)(3). Defendants have engaged in unfair, deceptive, or misleading acts by refusing to promptly refund consumers the money owed from a cancelled event originally scheduled at the Gaylord Opryland Resort and Convention Center at 2800 Opryland Drive, Nashville, TN, which is located in Davidson County.

8. This Chancery Court also has jurisdiction over both Defendants pursuant to Tennessee Code Annotated § 20-2-223(a)(1), (2), (5), and (7). Walker Stalkers, LLC has its primary place of business in Thompson's Station, Tennessee; Defendant James Frazier, who is the sole member and owner of Walker Stalkers, resides in Tennessee; and Defendants' acts of promoting and scheduling events in and out of Tennessee, selling tickets for those events, and then refusing to refund consumers after those events are cancelled all took place in Tennessee.

9. Defendants are further subject to jurisdiction in this State on any other bases authorized by law and consistent with the Constitutions of Tennessee or the United States.

**DEFENDANTS SELL TICKETS FOR EVENTS, CANCEL OR POSTPONE THOSE EVENTS, AND FAIL TO REFUND CONSUMERS AFTER PROMISING TO DO SO**

10. Defendants schedule events in cities across the United States as well as in London, United Kingdom. During these events fans can meet famous actors and artists associated with popular television programs as well as other celebrities. Defendants host two types of events. The first is the Walker Stalker Convention, or Walker Stalker Con, where actors from the TV show “The Walking Dead” are made available to meet and greet fans. The second type of event is the Heroes & Villains Fan Fest, or Fan Fest, where fans can meet celebrities from superhero shows.

11. Defendants sell tickets at different price points, offering consumers various levels of access to the stars and distinct service packages. Defendants also sell “Photo Ops,” or opportunities to take photos with celebrities, at these events. To date, consumers from at least twenty-one U.S. States and four foreign jurisdictions have purchased tickets from Walker Stalkers for either a Walker Stalker Con or a Fan Fest event.

12. Defendants also charge vendors who wish to sell their goods at the events for the use of specific spaces and basic equipment.

13. Defendant Walker Stalkers LLC began operating in 2013 and have put on dozens of events over the years. However, despite their initial success and growth, Defendants began experiencing financial problems in 2018 or earlier.

14. Defendants’ financial problems were exacerbated by Defendant Frazier’s practice of withdrawing large sums of money from Walker Stalkers accounts on a regular basis and using those sums for personal expenses. Defendant Frazier had sole control of Defendants accounts during the period in question.

15. Eventually, ticket sales at some of Defendants' events fell short of the amount necessary to put on the events, and Defendants ended up cancelling and postponing several events, including an event in Nashville, Tennessee.

16. After cancelling or postponing events, Defendants promised refunds but often failed to provide these refunds to consumers and vendors. When consumers demanded a refund—usually by e-mail, as Defendants could not otherwise be contacted—Defendants initially responded with generic promises that the consumer was “marked down” for refund. After months passed by without issuing refunds, Defendants would stop communicating with consumers altogether. Defendants also failed to refund vendors who paid Defendants for spaces to sell their own goods and services at Defendants' events.

17. For example, in the months leading up to the January 5–6, 2019 Fan Fest in Portland, Oregon, which was to be held at the Oregon Convention Center, Defendants sold tickets and event access to consumers and vendors. Consumers who purchased tickets for the Portland event received the following e-mail on December 17, 2018:

After much consideration, Fan Fest Portland (January 5 & 6) and Walker Stalker Con Phoenix (January 26 & 27) have been removed from our 2019 event line up. Our new calendar will allow us to offer the best possible experience for our attendees and guests as we continue to grow our more established markets. The rest of our 2019 calendar remains unchanged.

Refunds for Event Admission and Photo Ops will be processed automatically. You do not need to contact us or Celeb Photo Ops to initiate a refund. All refunds will automatically begin processing within 5–7 business days. As with any refund, funds may take an additional 5–7 days to hit your account, depending on your financial institution. Unfortunately, our ticketing system is unable to transfer tickets between different cities at this time so we will be automatically refunding all tickets to these two events.

18. When Portland consumers inquired via e-mail about when Walker Stalkers would issue refunds, Defendants responded with general assurances. For instance, one Portland

consumer received this response on December 28, 2018: “refunds have begun processing. Thank you so much for your patience.” In March 2019, more than two months later, after multiple e-mails and automated responses, this same consumer received the following response from Walker Stalkers: “Your refund is in the queue to be processed. Thank you so much for your patience.”

19. This experience was typical for most Portland consumers. In June 2019, when a consumer reminded Walker Stalkers of its promise in a December 17, 2018 e-mail to issue refunds within 14 days, the consumer received the following email from Defendants: “In our first email we said we would start processing refunds in that time frame, not that they would be complete . . . . We never stated that refunds would be complete in 14 days. Thank you.” In July 2019, after multiple e-mails, another consumer was given the following response from Defendants: “We are working through refunds daily and are addressing the oldest refunds first. We know this isn’t the answer you are looking for but we’ve marked you down to make sure it gets processed.” That same month Defendants informed another consumer: “We are refunding daily and provide refund updates to an admin committee to help keep the process transparent and information flowing.” Defendants wrote yet another Portland consumer in August 2019, “I understand how upset and frustrated you are. I don’t personally handle refund [sic] so I’m not sure where exactly you are on the list . . . but we are working on the mand [sic] have refunded quite a few over the last month and even before then.”

20. Some Portland consumers chose to wait before demanding refunds because Defendants sent the following e-mail to Portland ticket purchasers in January 2019:

Portland! We are excited to announce we will be making our way to the Pacific Northwest for Fan Fest Portland on a new weekend, November 23 & 24, 2019. Tickets are on sale NOW . . . If you had previously purchased admission for Fan Fest Portland, you do NOT need to take action at this time and your passes will be honored at the event this November. If you cannot attend Fan Fest Portland, please email refund inquiries to [info@fanfest.com](mailto:info@fanfest.com).

But on April 7, 2019, Portland consumers received another e-mail from Defendants stating that the November 2019 event was cancelled for good and would not be rescheduled. When Portland consumers who had been willing to attend the postponed event then requested refunds, Defendants again responded with vague assurances and purposefully delayed issuing refunds for months. To date, Defendants still owe money to many Portland consumers and vendors.

21. Consumers who purchased tickets and vendors who paid to access space at the Walker Stalker Con in Phoenix, Arizona on January 26–27, 2019 fared no better. In December 2018, Defendants circulated the cancellation e-mail cited in paragraph 17 above. Then in January 2019, Defendants wrote Phoenix ticket purchasers the following e-mail:

Phoenix! After working closely with our venue, we are excited to announce we will be making our way to the southwest for Walker Stalker Phoenix on a new weekend, September 14 & 15, 2019.

If you had previously purchased admission for Walker Stalker Phoenix, you do not need to take action at this time and your passes will be honored at the event this September.

In addition, those who purchased a Saturday or Sunday single-day pass will be upgraded to a Weekend 2-day pass. Those who purchased Weekend 2-Day passes will be issued a \$9 refund to reflect the new, lower price of \$50.

If you cannot attend Walker Stalker Phoenix, please email refund inquiries to [info@fanfest.com](mailto:info@fanfest.com). The deadline to request a refund is February 28, 2019.

In April 2019, however, Walker Stalkers wrote the following e-mail to the same group:

After much consideration, Walker Stalker Con Phoenix has been removed from our 2019 event line up and will not be rescheduled. The rest of our 2019 calendar remains unchanged. We just could not make it work due to multiple factors. Refunds for Event Admission will be processed automatically. As with any refund, funds may take an additional 5–7 days to hit your account, depending on your financial institution.

Like the Portland consumers and vendors, those who purchased tickets for the Phoenix event were misled by Defendants into believing that Defendants would refund their money, only to find out

many months and e-mails later that Defendants had deliberately failed to refund consumers. To date, Defendants still owe money to many Phoenix fans and vendors.

22. Defendants similarly scheduled a Walker Stalkers Con event in London, United Kingdom, to be held on March 30–31, 2019. As occurred with other events, Defendants took consumers’ and vendors’ money when they made ticket purchases in the months preceding the event, and then cancelled the event only weeks prior—after many had already made hotel and flight arrangements. Like their Portland and Phoenix counterparts, many London consumers and vendors still have not received refunds from Defendants.

23. Defendants planned to hold their next event—a joint event—in Nashville, Tennessee. Defendants announced and sold tickets for both a Walker Stalker Con Nashville and a Fan Fest Nashville, which were scheduled for August 24–25, 2019 at the Gaylord Opryland Resort and Convention Center at 2800 Opryland Drive, Nashville. But on August 10, 2019, two weeks before the event and after many out-of-State consumers and vendors had made hotel and flight arrangements, Defendants posted the following notification on its Facebook page:

Behind the scenes we’ve been attempting to work with the venue to reach a resolution to get the event to move forward. After some time, we are unsuccessful and can’t agree on certain terms that were already in the contract and how they were to be interpreted. These terms have greatly affected the rental cost of the venue. Therefore, for the success of the event and the continued positive growth of the company, we will be moving it to a new date and venue, January 4&5, 2020. We made every attempt to stay the same weekend but were unsuccessful.

We reached this decision yesterday, later afternoon, and have been making all arrangements behind the scenes to make this announcement this morning. But, we had been planning contingencies for a couple weeks in case it got to this point.

.....

We anticipate the vast majority of the guest [sic] can still attend the new date and we will be updating the list throughout the weekend. Your tickets will be honored and, if you cannot attend, please notify us at [Nashville@fanfestevents.com](mailto:Nashville@fanfestevents.com) for a



refund. Also, if an actor cannot attend the new date, those photo ops will be automatically refunded.

Unlike their Portland and Phoenix counterparts, Nashville consumers and vendors did not even receive an e-mail informing them of Defendants' unilateral and last-minute decision to cancel the event. Many ticket holders and vendors traveled to the event site only to discover the cancellation on the day of the event.

24. When a disappointed Nashville consumer requested a refund via e-mail a week after this announcement, Defendants replied, "If you are unable to attend the new dates [January 4–5, 2020], please send me a copy of your confirmation email and I will mark you down for a refund." A week later, when the consumer again inquired about the status of refund, Defendants wrote, "As everything is processed manually right now since we changed processors, refunds have been taking a little longer than normal. But we hope to have everyone refunded by our Atlanta dates [October 18–20, 2019] in October. Should you have any questions, please let me know." Other Nashville fans and vendors were given the same or similar messages: "I have you marked down that you need a refund for your VIP and your Weekend pass," and "our goal is to hopefully have everyone refunded by the end of October." Around this time, in late August 2019, Portland consumers (some of whom had been demanding refunds since December 2018) were likewise told that "hopefully" their refunds will have processed by the end of October. To date, many Nashville consumers and vendors have not yet received their refunds.

25. Defendants did not cancel all of their events in 2019. The following events took place as scheduled: (1) the April 19–21, 2019 Fan Fest in Chicago; (2) the June 29–30, 2019 Walker Stalker Con and Fan Fest in Secaucus (New Jersey); (3) the August 3–4, 2019 Walker Stalker Con in Cleveland; and (4) the October 18–20, 2019 Walker Stalker Con in Atlanta.

26. However, the New Jersey event, originally scheduled for May 2019, was rescheduled at the last minute on April 17, 2019, when ticketholders received an e-mail from Defendants stating: “Due to circumstances beyond our control, Walker Stalker Con New Jersey has been moved to June 29 & 30, 2019.” Even though some Walker Stalkers events took place on that date, some of the actors who were scheduled to appear cancelled their appearances; as a result, consumers who purchased “Photo Ops” with these actors were entitled to refunds. As they had done previously with other consumers though, Defendants deliberately and falsely assured the New Jersey “Photo-ops” ticketholders that their refunds were coming: “They are automatically processed and should take about 5–7 business days to process,” consumers were told. Months later and even today, most consumers who purchased “Photo Ops” that never took place at the Chicago, New Jersey, Cleveland, and Atlanta events have not yet received their refunds.

27. Defendants—Walker Stalkers and its sole owner, James Frazier—engaged in the practice of falsely assuring consumers and vendors that refunds for cancelled events would be forthcoming and then dragged out the refund process for as long as possible.

28. At all times, Defendant Frazier had sole control of Walker Stalkers’ finances and he closely monitored refund payouts. Only Defendant Frazier and two employees of Walker Stalkers, under Defendant Frazier’s close supervision, communicated with customers regarding refunds.

29. The vast majority of consumers or vendors who have been refunded to date have received their money back not because Defendants initiated any refunds, but because the consumer’s or vendor’s financial institutions initiated chargebacks at the consumers’ request. But consumers and vendors who refrained from requesting refunds in light of Defendants’ assurances that the Portland or Phoenix events would be rescheduled, often could not obtain refunds by this

means because most financial institutions will not issue chargebacks for older transactions. By promising to reschedule events that never materialized, Defendants were able to prevent consumers and vendors from initiating chargebacks, to the benefit of Defendants.

30. Defendants owe at least \$1,655,844 to various creditors—*not* including consumers, vendors, actors, and tax liens. In August 2019, Defendant Frazier filed a petition for insolvency in the United Kingdom at the Birmingham Priory Court at 33 Bull Street, Birmingham B4 6DS, to wind up Fanfest Events LTD (11681846), Case No. CR-2019-BHM-000564.

31. By the end of 2019, Defendants were also indebted to actors and other celebrities who had appeared at Walker Stalker Con and Fan Fest events. As a result of Defendants' nonpayment, the "talent" for these events began to cancel their appearances. On June 7, 2019, "The Walking Dead" and "Shazam!" actor Cooper Andrews posted the following on Instagram: "I've decided not to attend Fanfest N.J. in a few weeks. I'm also pulling out of ALL Walker Stalker/FanFest shows for the foreseeable future." Another "The Walking Dead" actor, Angel Theory, posted her explanation for breaking with Defendants on Instagram the very next day: "It's not fun when it comes to not getting paid from the Walker Stalkers company, what is owed to the actors. Just like you guys, y'all not getting y'all refunds back, the actors are not getting paid." In mid-June 2019, another "The Walking Dead" actor, Khary Payton, announced on Instagram: "After a lot of consideration, I've decided to no longer attend Walker Stalker/FanFest conventions." Khary Payton later posted on Twitter that it is "time to shut this . . . down," referring to the Walker Stalkers events. As of late October 2019, upon information and belief, all or the vast majority of "The Walking Dead" actors have cut ties with Defendants, and as a result Defendants can no longer host Walker Stalkers Con events in the future.

32. On October 23, 2019 Defendant Frazier announced via Facebook that after six years as the sole owner and operator, that he will be stepping down as the CEO of Walker Stalkers. “I will no longer have any decisions in the direction of the company and [its] daily management,” Defendant Frazier told stakeholders. He continued, “The short-term goals remain the same, to complete the outstanding refunds and pay off the other debts of the company.”

33. Michael DeVault, the spokesperson for Walker Stalkers, filled in as the interim CEO the next day. On October 24, 2019, DeVault announced on Facebook, “I wanted to update you on the current progress we’re making in the company’s restructuring and transition.” DeVault promised that his salary would be \$1 per year “until all refunds have been made, debts have been settled, and the convention’s future is secured.” DeVault also promised transparency and truthfulness regarding on the refund process. Four days later, following the desertions of “The Walking Dead” actors, DeVault announced on Facebook: “Earlier tonight, I made the unilateral decision to temporarily suspend ticket sales for all future Walker Stalker Con and Fan Fest Events in order to give myself and our management team the time we need to find answers to several pressing questions and to plot our path forward.”

34. DeVault’s tenure was short, however. After only one week on the job, DeVault resigned on November 1, 2019. DeVault has stated that once he was given access to Walker Stalkers’ finances, he discovered evidence of financial irregularities that led him to step down as CEO.

35. Defendant Frazier immediately re-gained control of the company, and on November 4, 2019, Defendants resumed ticket sales. Four days later, however, on November 8, 2019, Defendants posted the following message on Facebook:

Continuing the desire to be transparent, we are in discussion with multiple groups to sell Walker Stalker Con and/or its assets. Therefore, we believe it is prudent to

pause sales of Atlanta and Dallas (but also New Jersey for asset reasons too) until a final outcome is reached. We do believe those events will move forward but while discussions and negotiations are ongoing, it is best to not advance anything further at this time.

The immediate question and answer is, yes, the priority is refunds, talent debts and subcontractor debts to be paid from any sale or transfer of the company and/or its assets. If there are any proceeds after all of the debts are addressed those will go back into investing into the growth of Fan Fest Events.

Fan Fest Events is not being sold. Fan Fest London, Chicago and Nashville will all proceed as scheduled with no halt in sales or preparation. We are working and are active in negotiations to refresh the talent roster for Nashville and continue to build the list for London. We've been assured by many talent and managers that with the resolution of the debt, the guests will return.

Addressing some other concerns and rumors. We are actively working with the State of Tennessee to ensure that refunds are being addressed and have been for nearly two months. We are being transparent to show that there is a genuine effort and desire to resolve things. Our desire, which is why we've pushed to try to avoid winding up the company, is to get the debts of the company resolved.

In regards to London. The winding up of the 2019 licensee does not affect the ability to put on the February event. The 2020 event is being handled separately and is proceeding, as planned. We had discussions with the venue this morning and they are sending over the information and assets needed to get the events up on their website.

We aren't sure exactly what a new ownership group will mean for the future of Walker Stalker Con, but we hope that it goes into hands that will love it, like we do, and return it to the event you loved so much too.

Although this message informed stakeholders that "Fan Fest London, Chicago and Nashville will all proceed as scheduled with no halt in sales," Walker Stalkers stopped all its ticket sales on its website on November 8, 2019. On December 11, 2019, however, Walker Stalkers once again resumed ticket sales for the Nashville event originally scheduled for August 24–25, 2019.

36. On January 4–5, 2020, Defendants' rescheduled August 2019 Nashville event did take place, but at a far smaller and less expensive venue in Franklin, Tennessee. Defendant Frazier did not attend the event, as he was overseas during that time. Significantly fewer consumers,

vendors, and celebrities were present at the Nashville event compared with prior similar conventions. As of the date of this filing, Walker Stalkers has lost the vast majority of its employees.

37. Defendant Frazier has admitted that the money from the January 2020 Franklin, TN event ticket sales had been spent long before the event, and if the event had been cancelled there would have been no money with which to refund consumers.

38. At all pertinent times, Defendant Frazier has maintained control over Walker Stalkers' finances. Although he at times granted partial access to this information to Walker Stalkers' key employees, and Michael DeVault had control of Walker Stalker's finances during the one week he acted as CEO, Defendant Frazier had ultimate control over Defendant Walker Stalkers accounts, including all unearned revenue derived from ticket sales to consumers and vendors.

## COUNT I

### **Violations of the Tennessee Consumer Protection Act Tenn. Code Ann. § 47-18-104**

39. Plaintiff, the State of Tennessee, adopts by reference and re-alleges every allegation contained in paragraphs 1–38 of this Complaint.

40. Defendants' sale of tickets in Tennessee, as alleged herein, constitutes "trade," "commerce," and or "consumer transaction[s]" as defined in Tenn. Code Ann. § 47-18-103(19).

41. By systematically refusing to promptly refund money owed to consumers and vendors when their respective events were cancelled or postponed, after falsely assuring them that refunds would be forthcoming, Defendants have engaged in unfair or deceptive trade practices prohibited by the TCPA, in violation of Tenn. Code Ann. § 47-18-104(a) and (b)(27).

42. By actively participating in, approving, directing, or otherwise controlling the acts or practices referenced in paragraphs 1–38 on behalf of Defendant Walker Stalkers, Defendant James Frazier is individually and jointly liable for those acts or practices as they apply to the TCPA violations asserted in this Complaint.

### **PRAYER FOR RELIEF**

Therefore, Plaintiff, the State of Tennessee, pursuant to Tennessee Code Annotated §§ 47-18-108(a), (b), -114, the Attorney General’s power at common law, and this Court’s own equitable powers, request that this Court:

- A. Order that process issue and be served upon Defendants requiring Defendants to appear and answer this Complaint;
- B. Enter judgment against each Defendant and in favor of the State of Tennessee for each violation alleged in this Complaint;
- C. Grant the State of Tennessee such injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action, and to preserve the possibility of effective final relief;
- D. Make such orders or render such judgments as may be necessary to restore to any consumer or other person any ascertainable losses, including statutory and pre-judgment interest, suffered by reason of the alleged violations of the TCPA, and requiring that Defendants be taxed with the costs of the State hiring a restitution administrator to administer and distribute the same, pursuant to Tenn. Code Ann. § 47-18-108(b)(1);
- E. Award such equitable relief as the Court finds necessary to redress consumer injury resulting from Defendants’ violations of the TCPA including, but not limited to, disgorgement of ill-gotten gains;

F. Adjudge and decree that each Defendant pay civil penalties of not more than \$1,000 per violation to the State of Tennessee for each violation of the TCPA as provided by Tenn. Code Ann. § 47-18-108(b)(3);

G. Enter judgment against Defendants and in favor of the State of Tennessee for the reasonable costs and expenses of the investigation and prosecution of this action, including attorney fees, expert and other witness fees, and costs, as provided by Tenn. Code Ann. § 47-18-108(a)(5) and (b)(4);

H. Order that this Complaint be filed without cost bond as provided by Tenn. Code Ann. § 20-13-101 and further order that no costs be taxed to the State of Tennessee as provided in Tenn. Code Ann. § 47-18-116; and

I. Award the State of Tennessee such other and additional relief as the Court may determine just and proper.

Respectfully submitted,



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