

**STATE OF FLORIDA  
OFFICE OF THE ATTORNEY GENERAL,  
DEPARTMENT OF LEGAL AFFAIRS**

**IN THE INVESTIGATION OF:**

**Case No. L11-3-1007**

**UNITED FINANCIAL SYSTEMS, INC. and  
CHRISTOPHER BOULAHANIS,**

**Respondents**

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**ASSURANCE OF VOLUNTARY COMPLIANCE**

PURSUANT to the provisions of Chapter 501, Part II of the Florida Statutes, Florida's Deceptive and Unfair Trade Practices Act, the Office Of The Attorney General, Department Of Legal Affairs (hereinafter referred to as the "Department"), caused an investigation to be made into the business practices of **United Financial Systems, Inc.**, a Florida limited liability company, and **Christopher Boulahanis** (hereinafter "Respondents").

United Financial Systems, Inc. ("UFS") is a Florida limited liability company with its principal place of business registered as 1117 Banks Road, Margate, Florida 33063. Christopher Boulahanis is an individual residing at 7140 NW 126<sup>th</sup> Terrace, Parkland, Florida 33076, and is the Director and President of UFS.

Respondents are prepared to enter into this Assurance of Voluntary Compliance (hereafter referred to as the "AVC") without an admission that Respondents violated Florida's Deceptive and Unfair Trade Practices Act or any other law and for the purpose of resolution of this matter only with the Department.

The Department, by and through the undersigned Assistant Attorney General, and the undersigned Director of the Economic Crimes Division, being in agreement, accept this AVC in

termination of this investigation, as set out in the terms of this AVC, as to Respondents only, pursuant to Section 501.207(6), Florida Statutes, and by virtue of the authority vested in the Department by said statute.

### **I. STIPULATED FACTS**

The Department and Respondents hereby agree and stipulate to the following:

1. During the time frame beginning at least January 2008 through December of 2010, Respondents engaged in the business of marketing and providing debt management and/or debt consolidation services to consumers in Florida and elsewhere.

2. The Department has investigated allegations that Respondents failed to make timely payments to the consumers' creditors as promised and that Respondents violated Florida regulations relating to the fees charged for the services at issue.

3. Respondents make no admission that they engaged in any wrongdoing or committed any violation of Florida Statute 501, Part II. This AVC contains neither findings of fact nor conclusions of law.

4. Respondents and the Department desire to resolve all issues arising during the course of this investigation.

5. This AVC is based upon the stipulated facts set forth in Paragraphs 1-4 above. The Department shall not be estopped from taking further action in this matter should the facts described herein be shown to be incorrect in any material way, or the AVC not be complied with in full by Respondents.

## II. TERMS

6. UFS has voluntarily ceased providing debt management and debt consolidation services to consumers in the State of Florida and elsewhere. Respondents agree and stipulate that they will cease, desist and are hereby barred, directly as well as indirectly through representatives, agents, employees, successors, assigns, independent contractors or any other person who acts under, by, through, or on behalf of Respondents, from marketing, selling, advertising, offering, or providing credit counseling, debt management, or debt consolidation services in the State of Florida. The foregoing does not affect or preclude Respondents from participation in debt settlement services, providing Respondents comply with the provisions of Paragraph 7 herein.

7. Respondents, including its representatives, agents, employees, successors, assigns, independent contractors or any other person who acts under, by, through, or on behalf of Respondents, directly or indirectly, or through any corporate or other device, shall:

- a. Comply with the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes; and
- b. Comply with Florida Statutes Sections 817.801 through 817.805 relating to credit counseling services, including in particular (i) comply with the statutory caps relating to the maximum fees permissible for initial setup, initial consultation and/or monthly service fees, and (ii) timely disburse funds to the appropriate creditors as required under Florida Statutes Section 817.805.

7. Respondents shall make the terms and conditions of this AVC known to any managers, members, officers, directors, employees, agents, independent contractors or anyone else acting for or on behalf of Respondents as well as anyone involved in an ownership, or employment capacity in any other businesses in which any Respondents were involved. The obligation imposed by this paragraph is continuing in nature and shall apply to new officers,

employees, agents, representatives or any other persons who become engaged in the entity's business activities, including any future business activities in which Respondents engage.

8. It is further agreed by the parties that Respondents shall not affect any change in the form of doing business, or the organizational identity of any of the existing business entities, or create any new business entities, as a method of avoiding the terms and conditions set forth in this AVC.

9. Nothing in this AVC shall be construed as a waiver of any private rights of any person or release of any private rights, causes of action, or remedies of any person against Respondents or any other person or entity.

### **III. STIPULATED PAYMENTS**

10. Respondents agree to refund consumers as set forth in Exhibit A hereto, the total amount of which as of the date of this AVC is \$595,881.47, as well as any other consumer who files a complaint regarding Respondents with the Office of the Attorney General within 60 days of the effective date of this AVC (the combined total of which is hereinafter referred to as the "Restitution Amount"). Upon the conclusion of 60 days following the effective date of this AVC, the Department shall provide Respondents with an updated list of consumers including those who submitted complaints or affidavits within 60 days of the effective date of this AVC and the amounts due to each consumer, which shall replace and serve as the operative Exhibit A thereafter. To the extent Respondents object to any additions or modifications to Exhibit A to reflect additional consumers who file a timely complaint, such consumers shall be included absent sufficient documentation provided by Respondents to establish to the OAG's reasonable satisfaction that Respondents made full and timely payment of all appropriate amounts to the

consumer's creditors. All such refunds shall be fully paid by Respondents as follows, with time being of the essence:

- a. 10% of the Restitution Amount or \$65,000, whichever is greater, shall be paid on or before December 22, 2011;
- b. an additional 10% of the Restitution Amount or \$65,000, whichever is greater, shall be paid in consumer restitution each consecutive month on or before the last day of that month for the next eight (8) months; and in the following and ninth month, all remaining amounts or unpaid amount of the total Restitution Amount shall be paid on or before the last day of that month, namely August 31, 2012, such that all Restitution Amount due under Paragraph 10 of this AVC shall be fully paid on or before August 31, 2012.

11. The restitution amounts due under Paragraph 10 of this AVC shall be paid by Respondents to the Department made payable to the Legal Affairs Escrow Fund within the time periods set forth above. The Department shall thereafter distribute the funds periodically in accordance with the persons and amounts listed on Exhibit A as the Department determines is reasonable in its sole judgment via first class mail at their last known address of record based upon the records made available by Respondents or as otherwise determined by the Department. In the event that a consumer payment is deemed undeliverable in the business judgment of the Department after reasonable attempts are made by the Department to locate the consumer, the unclaimed funds will revert to the Department.

12. At the reasonable request of Respondents, the Department shall periodically provide documentation to the Respondents indicating the consumers refunded and amounts paid to each such consumer.

13. The parties agree that Respondents shall contribute \$35,000 (THIRTY FIVE THOUSAND DOLLARS) to the State of Florida, Office of the Attorney General, Department of Legal Affairs, pursuant to Section 501.2105, Florida Statutes, in payment of all attorneys' fees, costs and investigative fees regarding this investigation and future attorneys' investigative costs regarding this investigation. All payments shall be made by cashier's check or other certified funds, made payable to Department of Legal Affairs Revolving Trust Fund. The payment shall be submitted to René D. Harrod simultaneous within the submission of a partially executed copy of this AVC.

14. Subject to Respondents' compliance with this AVC, the Office of the Attorney General is waiving payment of any statutory penalties for violation of Florida Statutes Section 501 of up to \$15,000 per violation by Respondents in consideration of the parties' entry into this AVC.

15. The original AVC, bearing the notarized signatures of Respondents and the above-described payment, will be delivered to the attention of: René D. Harrod, Assistant Attorney General, Office of Attorney General, Economic Crimes Division, 110 SE 6th Street, 10th Floor, Fort Lauderdale, FL 33301.

#### **IV. BUSINESS RECORDS**

16. Any personal or financial information provided by or relating to consumers in the custody or possession of Respondents shall be securely stored in such a manner as to reasonably

protect against inadvertent disclosure of consumer information. Respondents including any representatives, agents, employees, successors, and assigns, shall not, directly or indirectly, market, sell, share or otherwise disclose the name, contact information, or financial information of any consumer who provided any personal or financial information or any monetary payment to Respondents.

17. Respondents agree to retain documents and other information reasonably sufficient to establish compliance with the provisions of this AVC for two (2) years, and shall provide reasonable access to such documents and information to the Department upon request.

#### **V. FUTURE VIOLATIONS**

18. It is hereby agreed by the parties that any failure to comply with the terms and conditions of this AVC is by statute prima facie evidence of a violation of Chapter 501, Part II, Florida Statutes, and will subject Respondents to any and all civil penalties and sanctions authorized by law, including attorney's fees and costs.

19. In addition, Respondents hereby agree and consent that in the event that Respondents fail to fully and timely perform the obligations set forth in this AVC in Paragraphs 10 through 12, inclusive, with time being of the essence in all respects, Respondents consent to and will not oppose or contest entry by a Court of competent jurisdiction of the Stipulated Final Judgment and Injunction attached hereto as Exhibit B without the need of any hearing or submission of evidence.

#### **VI. CLOSURE OF INVESTIGATION**

20. It is further agreed by the parties that upon the receipt of the agreed upon payments from Respondents, the Office of the Attorney General agrees to close its civil

investigation into the activities of Respondents, as set forth above, without prejudice to any remaining investigation as to other entities including, without limitation, as to Jaime Lyons. The parties agree that this AVC has been entered into based on the truthfulness of the information provided by Respondents.

#### **VII. EFFECTIVE DATE OF ASSURANCE OF VOLUNTARY COMPLIANCE**

21. It is further agreed by the parties that the effective date of this AVC shall be the date of its execution and delivery by all the parties, including each of the parties reflected by the signature lines below. Acceptance by the Office of the Attorney General shall be established by the signature of the Director of Economic Crimes. The receipt by the Office of the Attorney General of any monies pursuant to the AVC does not constitute acceptance by the Director of Economic Crimes, and any monies received shall be returned to Respondent if this AVC is not accepted and executed by the Director of Economic Crimes.

22. It is further agreed that facsimile copies of signatures and notary seals may be accepted as original for the purposes of establishing the existence of this agreement.

#### **VIII. NOTICE TO PARTIES**

23. It is further agreed that future notice to any of the parties to this AVC may be made by notice sent certified mail to at the addresses set forth below unless either party notifies the other by certified mail of another address to which notices should be provided.

#### **IX. CONSTRUCTION OF AGREEMENT**

24. It is further agreed that the parties jointly participated in the negotiation of the terms of this AVC. No provision of this AVC shall be construed for, or against, any party, on



the grounds that one party had more control over establishing the terms of this AVC, than another. This AVC may be signed in counterparts, which together shall constitute one agreement.

In witness whereof, Respondents have caused this AVC to be executed in the county and state listed below, as of the date affixed thereon.

By my signature I hereby affirm that I am acting in my capacity and within my authority as corporate representative, as well as in my individual capacity, and that by my signature I am binding myself and the business to the terms and conditions of this AVC.

**SIGNATURE PAGE FOLLOWS:**

**CHRISTOPHER BOULAHANIS**

By: [Signature]  
Christopher Boulahanis, as President of United Financial Systems, Inc.

By: [Signature]  
Christopher Boulahanis, Individually

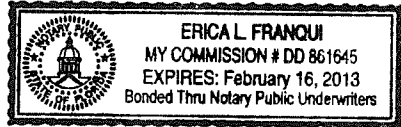
STATE OF FLORIDA )ss  
COUNTY OF BROWARD )ss

*Christopher Boulahanis*

BEFORE ME, an officer duly authorized to take acknowledgments in the State of Florida, appeared ✓, who produced \_\_\_\_\_ as identification. S/he acknowledged before me that he executed the foregoing instrument for the purposes therein stated on the 29 day of November, 2011.

Subscribed to before me this 29<sup>th</sup> day of November, 2011.

[Signature]  
NOTARY PUBLIC  
(print, type, or stamp commissioned Notary Public)



Personally known ✓ or Produced Identification \_\_\_\_\_ (check one)  
Type of Identification Produced: \_\_\_\_\_

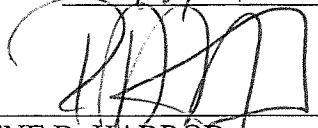
**Witnessed:**

By: [Signature]  
Robby H. Birnbaum, Esq., Counsel for Respondents  
Bar Number 175889  
Greenspoon Marder, P.A.  
100 West Cypress Creek Road, Suite 700  
Fort Lauderdale, FL 33309  
(954) 491-1120 (Main Telephone)  
(954) 343-6959 (Direct Telephone)  
(954) 343-6960 (Direct Facsimile)  
Robby.Birnbaum@gmlaw.com

Initials: CB

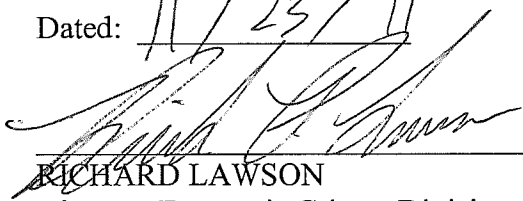
**OFFICE OF THE ATTORNEY GENERAL**

Dated: 12/2/11



RENE D. HARROD  
Assistant Attorney General  
110 S.E. 6th Street, 9th Floor  
Fort Lauderdale, FL 33301  
(954) 712-4600  
(954) 527-3708 facsimile

Dated: 11/23/11



RICHARD LAWSON  
Director, Economic Crimes Division  
Department of Legal Affairs  
OFFICE OF THE ATTORNEY GENERAL  
The Capitol  
Tallahassee, FL 32399-1050  
(850) 245-0140

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
ABRAHAM	PRIYA	Troy	PA	16947	1/1/2007 1/1/201	\$3,970.00
Acayan	Terry	Saint Johns	FL	32259	9/3/2010	
Adamaszek	Ken		NC			\$1,000.00
Adams	Melissa	Hobart	IN	46342		
Aldridge	Larry		Michigan			
Allen	Nancy	Shrewsbury	NJ	07702-40	5/4/2010	
Allen	Brenda K.	Lake Wales	FL	33898	9/9/2006	\$588.00
Aluyah	Christine	Spokane	WA	99202	12/2/2009	\$3,140.00
Amato	Katheryne	Smithtown	NY	11787	11/25/2010	\$497.00
Anderson	Robin	Waukesha	Wisconsin	53188		
Anwar	Mary	Moreland	GA	30259	8/26/2010	
Aten	Carol & Christina	Tallahassee	FL	32312-153	8/1/2008 8/1/2010	
Ayukobi	Atem	SanAntonio	TX	78240		
BARBER	JAMES	Medina	OH	44256	10/17/2008	\$7,498.00
Bass	Jennifer	Littleton	CO	80128	11/1/2010	\$3,732.00
Beard	Willie Jean	Cordova	TN	38016	9/17/2010 10:17:	\$2,120.00
Beck	Patricia	Las Vegas	NV	89117		
Beers	Cynthia	Fountain	CO	80817	10/21/2005	\$662.00
Bellavance	Normand	Norfolk	MA	2056	6/1/2010	
Benson	Amy	Raleigh	NC	27603	10/20/2008	\$1,589.00
Bessey	Tioni	Norridgewock	ME	4957		
Betz	Alissa	Louisville	KY	40299	9/1/2010	
Bidenger	Richard	Medina	OH	44256	2007	\$1,626.00
Bigelow	Michelle	Worcester	MA	1501	1/16/2006	\$1,143.00
Biggins	Alice	Avon	MA	2322	8/1/2010	\$1,086.00
Birkett	Timothy	Teaneck	NJ	07666	10/1/2010	
Bland	William	Beaumont	TX	77706	6/1/2010	\$1,250.00
Boatwright	Cassie	Hondo	Texas	78861		
Bocak	Maryann	Garfield	NJ	07026	9/3/2010 10:21:1	\$3,220.00

**EXHIBIT A**

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Boccanfuso	Noris	West Orange	NJ	07052	11/29/2010	
Bologna	Antonio	El Paso	TX	79936	3/6/2009	\$10,556.00
Boraco	Deborah	New Orleans	Louisiana	70130		
Bordeau	Ronald	Millbury	MA	01527	8-Dec	\$1,642.00
Boswell-Dike	Jerry & Pamela	Bloomington	Indiana	47401	12/4/2008	\$6,475.00
Bowen	Brenda	Tucson	AZ	85705	10/3/2010	\$2,655.00
Bracken	Jason	Johnstown	Pennsylvania	15904	5/1/2008	
Bradley	Susan	Gibsonia	PA	15044		
Bramm	Adam	Washington	DC	20010	11/2/2006	\$1,300.00
Brennan	Brittany	Covington	LA	70435	10/26/2010	
Broadway	Patricia	Talent	OR	97540	11/1/2010	\$1,980.00
Brookhart	Lavon	Ft Collins	CO	80524		\$1,000.00
Brookhouse	Jamie	Valparaiso	IN	46383	1/6/2009	\$2,275.00
Broselow	Lisa	Levelland	TX	79336	11/16/2010	\$445.00
Brown	Edward	Berea	Ohio	44017		
Brown-Tuyishimire	Rebecca	Wahiawa	HI			
Brubacher	Sidney	Wausau	WI	54401	10/1/2010	\$1,000.00
Bryson	Karen	Kearney	NE	68845	11/20/2006	\$1,600.00
Buckmaster	Ora	Bullhead City	Arizona	86429		
Bulzomi	Mary	Renton	WA	98056	4/23/2010	\$1,700.00
Burghart	Tammy	Bismarck	ND	58504		
Burris	Jennifer	Ridgefield	NJ	07657	2009	\$1,146.00
Byrne	Charles	Liberty	Indiana	47353	Jul-10	\$8,000.00
Cady	Thomas	Gardner	MA	1440	4/14/2008	\$1,448.00
Camper	Gerald	Stephens City	VA	22655	11/20/2008	\$2,057.00
Canning	Patricia	Dallas	TX	75206		
CANTONWINE	KSEA	Olympia	WA	98508	Oct-07	\$2,065.00
Card	Helen		FL			
Carden	Michael	Riley	NC	27614		

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Cargill	Tanya	Cleveland	OH	44111	10/1/2007	\$1,106.00
Cassinelli	Floyd J.	Clairton	Pennsylvania	15025	11/10/2008	\$2,728.00
Castle	Michael	Hilliard	OH	43026	Apr-09	\$2,593.00
Caylor	Tyra	Luling	LA	70070		\$1,450.00
Cervantes	Gina	Bakersfield	CA	93306	1/19/2009	
Cheatham	Mike	Clarksville	TN	37040		
Cherry	Muriel	Portsmouth	VT	23702	2/7/2008	\$866.00
CHOMPRE	MARIA	Bronx	NY	10454	11/30/2010	\$829.00
Christman	Victor	Indianapolis	Indiana	46234	2/11/2008	
Clark	Gayle A.	Whitman	Massachusetts	2382		
Clemens	Sherry		NY			
Clement	Tammy	Lakeland	FL	33801	9/18/2006	\$4,053.00
Clements	Sherry	Spencer	NY	14883	12/1/2011	
Coby	Mindy	Parsippany	NJ	7054	11/1/2008	
Cochran	Jean	North Fort Myers	FL	33903		
Cohen	Janel	Jupiter	FL	33458		\$5,000.00
Collett	Susan M.	Joseph	Oregon	97846	3/1/2009	
Collins	Vicki	Westminster	CO	80030		
Collins	Caroline	Franklin	MA	02038		
Comeaux	Dean	Baton Rouge	LA	70816	1/2/2007	\$897.00
Condon	Glenn	Rehoboth Beach	DE	19971-977	1/1/2010	\$1,465.00
Conley	Elizabeth	Williamstown	NJ	8094	10/30/2010	\$1,313.00
Coon	James	Baton Rouge	LA	70816		
Coon	James		FL			
Cooper	Maarianne	Mansfield	OH	44907	6/1/2009	\$5,204.00
Cooper	William T.	Mansfield	OH	44907	10/16/2010	
Cormier	Marc	Lebanon	OH	45036	11/15/2010	
COSTLEY	TASHA	San Marcos	TX	78666	Nov-07	\$1,100.00
Cowan	Shirley		FL			

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Cowden	Dorothy G.	Colorado Springs	Colorado	80906	11/1/2010	
Coy	Vickie L.	Mount Washington	Kentucky	40047		
Craig Zerhusen	Michelle	Cincinnati	OH	45452		
Crum	Ken	Pt St Lucy	FL	34984		
Cunningham	Lezlie	Burleson	TX	76028	11/28/2006	\$1,270.00
Cusato	Anthony	Lothian	MD	20711		
Dagostino	Laurie	Tucson	AZ	85742	12/1/2010	\$2,384.00
D'Agostino	Michael	Duluth	GA	30097	1/12/2011	
Dalton	Dara	Arvada	CO	80005	2/8/2006	\$286.00
Daniels	Dolores	Glendale	CA	91203	9/1/2010	\$1,478.00
Darden	Alice B. Smith	Columbus	Georgia	31907-602	6/3/2008	\$1,780.00
DAUGHERTY	DEBORAH	Conway	AR	72032	1/4/2011	
Davenport	Steven	Cleveland	OH	44102		\$129.00
Davis	Stephanie	Camilla	GA	31730		
Davis	Lisa	Newcomerstown	OH	43832	1/4/2006	\$1,299.00
Davis	Bryan	Sudan	TX	79371	4/23/2007	
Davis	Bryan		Texas			
Deepty	Josh	Wood-Ridge	NJ	7075	11/1/2010	\$1,260.00
DeJesus	Jorge	Malden	MA	02148	Apr-08	\$2,265.00
Demps	Lisa		FL			
Denard	William	Aurora	CO	80013		
Denney	Ann		FL			
DeSoto	Jennifer	Pearland	TX	77581	7/22/2010	
Devoux	Carolyn	Port Charlotte	FL	33952		
Deweber	Sally	Denton	TX	76205	7/27/2010	
Dienhart	Daniel	Suwanee	GA	30024	10/13/2008	\$1,720.00
DiGuardia	Richard	Wakefield	MA	1880	7/25/2005	\$276.00
Dingus	Cindy	Mount Sterling	OH	43143		\$2,600.00
Dourdeau	Ronald	Millbury	MA	01527		

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Dovbish	Lori	San Rafael	California	94903		\$535.00
Dowell	Steve	Parker	CO	80138	10/1/2010	
Downing	Dusty	Chillicothe	OH	45601		\$1,890.00
Drake	Carol	Tiffin	OH	44883	10/1/2010	\$1,756.00
Drayer	Mimi		FL			
Dreckman	Jennifer	North Liberty	IA	52317	10/14/2010	
Dries	Toni	Catasauqua	PA	18032	6/21/2011	\$925.00
Duff	Christopher	Denver	CO	80204	10/1/2010 10/26/	\$3,146.00
Dunaway	Joyce	Dallas	Oregon	97338		
Dutson	Sandra	Stafford	VA	22554	12/7/2010	\$2,520.00
Dwyer	Kelly	Jersey City	NJ	7302	12/15/2010	\$832.00
Eberly	Jeanne	Cecil	OH	45821		
Edenfield	Joseph	Charlotte	NC	28230	11/2/2010	\$1,500.00
Edwards	Paul	Decatur	TN	37322	6/15/2005	\$811.00
Ellett	Sarah W,	Dewitt	Virginia	23840	2007	\$6,000.00
Ellis	Patricia	Fitzgerald	Georgia	31750		
Ellison	James	Tallapoosa	Georgia	30176	9/1/2008	
Ellison	Joyce	Tallapoosa	GA	30178		
Embick	James	Cuyahoga Falls	Ohio	44221	11/20/2007	\$15,000.00
Esposito	Penny L.	Brooklyn	NY	11234	11/2/2010	\$244.00
Fiore	Toni	Belville	MI	48111		\$5,000.00
Fiore	Toni					
Fisk	Lori	Waterbury Center	VT	5677	1/8/2007	\$3,000.00
Fitzpatrick	Kevin	Medford	MA	2155	10/1/2010	\$2,858.00
Fogt	Linda	Miamisburg	Ohio	45342	Sep-01	
Forte	Reginald	Wake Forest	NC	27587	3/1/2010 12/1/2011	
Foster	Elaine	Tuscaloosa	AL	35406	6/25/2010	
Foust	Michael	Colorado Springs	CO	80907	10/1/2008	
Frances	Rosalind	Virginia Beach	Virginia	23464		



Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Fussell	Brittany	Covington	LA	70435	1/25/2008	\$789.00
Gallagher	Pamela	Maysville	KY	41056	6/24/2010	
Gamble	Ron		FL			
Gann	Sherie	Meridian	TX	76665		
Gardini	Robert	South River	NJ	8882	May-04	\$911.00
Garner	Linda S.	Bowie	Maryland	20716	8/1/2010	\$1,194.00
Garner	Joe & Mary	Cedar Rapids	IA	52404		\$2,000.00
Garner	Joe		FL			
Geiger	Lisa	Florence	KY	41042	11/6/2008	\$874.00
Gianatasio	Philip	Lodi	NJ	7644	Feb-09	\$3,483.00
Gibson	Desiree	Cherokee	Oklahoma	73728		\$500.00
Gilliam	AraLana	Richmond	VA	23227	8/2/2010	
Glass	Janice L.	Jeffersonville	Pennsylvania	19403		
Goles	Anthony	Steelton	PA	17113		\$2,139.00
Gomez	Traci	Alpharetta	GA	30022		
Gonzalez	Curtis					\$400.00
Gover	Tony	Woodstock	MD	21163		
Gover	Tony			Florida		
Griffin	Kendra	Brownfield	ME	4010		
Grirere	Margreat	Webster	Massachusetts	1570		
Guillet	Rhiannon	Nashville	TN	37206	8/1/2010 12/1/20	\$1,500.00
Gulliam	Ara		Virginia			
Gullo	Angeline	Ft Lauderdale	FL	33317	2010	\$3,000.00
Guss	Leotha	Lafayette	LA	70507	3/5/2009	\$1,006.00
Gussman	Linda	Independence	MO	64057	1/1/2010	
Haas	Kimberly M.	Sparta	Wisconsin	54656		
Haidet	Zaenna	Cleveland Hts	OH	44118	8/23/2010	
Halvorson	Bernice	Virginia Beach	VA	23454	2008	\$1,600.00
Haman	Linda	Fort Wayne	Indiana	46825		

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Harbeintner	Robert	Northfield	MN	55075		
Hart	Anissa	San Antonio	TX	78244	7/1/2010	\$1,705.00
Hastings	Kari	Williston	ND	58801	2005	\$768.43
Havanki-O'Halloran	Melissa	Port Reading	NJ	7064	10/28/2010	
Havel	Gregory	Rochelle Park	NJ	7662	11/4/2009	
Heather	Joe	St. Paul	MN	55113	2/1/2009	
Heidecker	Sean	Hazle Township	PA	18202	5/1/2010 9/1/201	\$605.00
Helgeson	Michelle	Auburn	MA	1501	1/16/2006	
Helmers	Chris	Bloomingtondale	NJ	7403	10/22/2010 11:22:10 AM	
Hennen	Heather	Brownsburg	IN	46112	11/1/2010	
Hersh	Elisia	Breckenridge	CO	80424	9/17/2010 10:17:	\$1,288.00
HICKS	TONYA	Bradford	AR	72020	8/13/2006	\$2,242.00
Hicks	Tonya	Beradford	AR	72020	8/13/2006	\$2,242.00
Hill	Shelly	Tecumseh	OK	74873		
Hluska	John	Vicksburg	MS	39180		
Hoff	Barbara	Caldwell	ID	83605		\$608.00
Hoiland	Leslie	Lewiston	ID			
Holmes	Joan	Pompano Beach	FL	33064	11/1/2007 8/1/2010	
Hooper	Toni	Nashville	Tennessee	37203	4/28/2006	\$1,931.00
Hopkins	Kelley	Dayton	NV	89403	2/1/2010	
Hough	Robert	Liberty	Missouri			
Huber	Tyson	Burnettsville	Indiana	47926	Oct-08	\$1,022.00
Hublely	Jennifer	Waukesha	WI	53188	11/3/2010	\$2,257.00
Huddleston	Jessica	Indianapolis	Indiana	46231	Apr-07	
Huerta	Dalton	Arvetta	CO	80005		\$2,131.00
Huff	Barbara J.	Caldwell	Idaho	83605	2010	\$608.00
Hupp	Jillian	Fairborn	OH	45324		
Hussain	Azhar	Washington	DC	20003		
Hynick	Paula	Bristol	CT	6010	4/1/2007	

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Iacampo	Wendy	South Windsor	CT	6074	2010	\$2,068.00
Ingber	Marcie & Jeffrey	Providence	RI	02906	2/1/2006	\$7,188.00
Ingber	Jeffrey		FL			
Ingber	Marcie		FL			
Ingeman	Rebecca	Hallock	MN	56728	10/7/2010 11:08:10 AM	
Ingram	ClayD.	Henry	Virginia	24102	3/3/2011	\$10,000.00
Insignares	Ingrid	Elmwood Park	NJ	7407	6/1/2010 9/10/20	\$2,336.00
Jackson	Melissa	Jacksonville	FL	32244	8/1/2010 11/1/2010	
Jackson	Tanya		FL			
Jacob	Randall & Linda	North Huntingdon	PA	15642	1/14/2011	
Jakobsen	Jason	Lake Stevens	WA	98258	11/2/2010	
JamesJr.	Aubrey	Milwaukee	WI	53216	8/1/2010 8/1/201	\$1,240.00
Jarrett	Adrienne C.	Lawnside	NJ	8045	1/10/2010	\$1,360.00
Jenkins	Lawrence	Robert	LA	70455	11/3/2010	
Jennings	Tammi	Odenton	MD	21113	9/2/2010	\$195.00
Jensen	Christine	North Wales	PA	19454		
Jessup	Alissa	Wyckoss	NJ	07481		\$6,000.00
JOHNSON	REBECCA	Anoka	MN	55303	4/4/2006	
Johnson	Heather	Canyon	TX	79015		
Johnson	Michael		FL			\$4,200.00
Johnston	Joan	San Antonio	TX	78254		\$15,889.00
Jones	Thomas	Gt. Barrington	MA	1230	11/9/2010	
Jones	Ashley	Jacksonville	FL	32210	11/10/2010	
Jones	Betty	Jacksonville	AK	72076		
JonesJr	Shelby	Mount Washington	KY	40047		
Karr	Marilyn	Omaha	NB	68116		
Kastor	Stephen	Hilliard	OH	43026	12/1/2001	\$1,996.00
Kauskas	Marjorie	Tampa	FL	33635	10/15/2010	
Kearns	Joanne	Lyndhurst	NJ	7071		

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Ken	Crum	Port St Lucie	FL	34984		\$2,000.00
Kenary	Julie	St. Johnsbury	Vermont	5819		
Kett	Bradley	NewBerlin	WI	53151	12/7/2010	\$1,100.00
Kilpatrick-Shaw	Theresa	Brandon	Mississippi	39047		
King	Michelle	Geneva	OH	44041	Feb-06	\$2,052.00
King	David	Spencerpoint	NY	14559		\$678.00
Kubiak	Judith M.	SantaFe	NewMexico	87508		\$1,500.00
Kumar	Sashi	Inglewood	CA	90305		
KURTA	ALEX J	Port Vue McKeesport	PA	1.5E+09	10/12/2005	\$3,535.00
Labassiere	Ronald E.	Pawtucket	Rhode Island	2860	9/1/2006	
Lake	SANDRA	Millfield	OH	45761		\$1,613.00
Lammers	Virginia	Leipsic	OH	45856	12/15/2008	\$1,845.00
Latimer	Patricia	Carson	Washington	98610		\$3,720.00
Lauhala	Dennis	Antioch	TN	37013	Jan-07	\$2,015.00
Lavrishina	Gilli	Canton	MA	2021		
Lewis	Teresa	Charlotte,	NC	28214	11/1/2010	\$306.00
Lilley	Sandra		Colorado			
Lombardi	Heidi	Warren	RI	2885	10/9/2010	
Louviere	Jeannie	Chauvin	LA	70344		
Lowe	Judith K.	Santa Fe	New Mexico	87508	10/27/2010	
Lucas	Philip J.	Mooresville	North Carolina	28115	3/25/2008	
Luetjen	Jennafer	Columbia	CT	6237	Mar-07	\$2,163.00
Luttrell	Linda	Westminster	CO	80020	11/18/2008	\$2,400.00
Lyon	Dean	Stowe	VT	5672	Mar-07	\$771.00
Lyons	John H.	Appleton	Wisconsin	54911	8/16/2007	\$280.00
Maguire	Jody	Moira	NY	12957	11/26/2010	\$523.00
Mahoney	Matt	West Roxbury	MA	2132	9/30/2010	
Malo	Jocelyn	Sidney	MT	59270	6/4/2008	\$5,523.97
Malone	Maryellen	Landing	NJ	07850		\$5,400.00

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Mann	Hector & Vickie	Elizabeth City	NY	27909		\$1,180.00
Marchman	Vanessa	Roswell	GA	30075	Nov-10	\$756.00
Martin	Edwin	Huntsville	Alabama	35811	9/15/2010	\$9,436.00
Martinez	Carlos	Los Angeles	CA	90057	4/3/2010	
Martinez	Richard & Dian	Miles City	MT	59301	1/12/2011	\$750.00
Martinez	Raul	Gonzales	TX	78629		\$1,040.00
Martinez	Richard	Miles City	MT	59301	4/25/2005	\$750.00
Martinez	Jose	Rensselaer	NY	12144	2004	\$800.00
Mast	Darin L.	Elkhart	Indiana	46517	9/1/2007	\$6,000.00
Mast	Chanel	Eikhart	Indiana	46517	Sep-07	\$7,167.00
Matthews	Sharon	Fort Valley	GA	31030	12/1/2008	\$6,948.00
McCarty	Angela		Arkansas			
McCoy-Olds	Pamala	Sandpoint	ID	83864	6/1/2007	\$197.00
McCullah	Kimberly	Strongsville	Ohio	44136		
McLaughlin	Barbara	Raymond	NH	3077	8/10/2010 10:00:	\$1,200.00
McMullen	Paul	Macedonia	OH	44056	8/3/2010	
Micek	Renee	Springboro	OH	45066	3/5/2009	
Michalak	Jill	Griffith	IN	46319	11/9/2010	
Micheal	Jason	Turbotville	PA	17772		
Miller	Thomas G.	Princeton	NJ	27569	8/2/2010	
Miller	Shelby		FL			
Mlinar	James F.	Cheyenne	NY	82001	3/16/2009	\$585.00
Moan	Steven	Greenwood	IN	46142	1/9/2010	
Moffett	Robert	Loogootee	IN	47553	Dec-07	\$908.00
MONCADA	Sara		Miami	FL		
Moore	Waverly	Pasco	WA	99301	2/9/2009	\$5,700.00
Morehead	Andrea	Amarillo	TX	79110	8/1/2007	\$4,176.00
Morris	Tamya	Chatsworth	GA	30705	11/1/2010	\$876.00
Morris	Sarah	Clayton	NC	27527		

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Morrow	David J.	Spokane Valley	Washington	99206	2/7/2008	
Morse	Kimberly	Glendale	RI	02826-00	1/1/2006 1/1/2010	
Mumaw	Judy	Wadsworth	OH	44281	3/9/2009	\$4,043.00
Murie	Colleen	Antioch	TN	37013		\$1,200.00
Murphy	Joyce	Mount Holly	NJ	8060	2006	\$1,114.00
Neal	Christopher	Aurora	CO	80013	2/1/2007	\$1,902.00
Nelson	Richard	Alexander	AR	72002		\$1,762.00
Nersesova	Lisa	Dallas	TX	75226	10/27/2010	\$800.00
Newman	Raymond		Texas			
Newton	Barbara	Albuquerque	NM	87111	10/16/2016	
Nicholas	Larry	Goldendale	WA	98620	10/9/2010	
Nidermyer	Cindy		FL			
Noble	John	Portland	OR	97202	10/1/2010	\$2,978.00
Novikov	Nikolay					\$3,699.00
Nuckols	Jason	Russellville	AR	72802	2/1/2010	
Nunn	Robert	Jonesboro	Georgia	30236		
O'Donnell	Charles	Fort Myers	FL	33905	1/1/2007	\$3,339.00
O'hallalaran	Mellissa		FL			
Olintier	Marshall	Chilhowie	Virginia	24319		\$2,500.00
Oneil	Brenda M.	Belvidere	NJ	7823	3/1/2006	\$2,619.00
O'Sullivan	Kelly	Avon Lake	OH	44012	11/12/2010	\$1,214.00
Packston	Bennie	Sanford	NC	27330		
Pals	Aaron	Manly	IA	50456	6/1/2007 11/1/20	\$2,424.00
Patterson	Dena	Pittsburg	KS	66762	8/31/2010	\$939.00
Peffer	Paula Jean	Oxford	North Carolina	27565		\$4,854.00
Pejerrey	Martin	Budd Lake	NJ	7828	10/1/2010	
PERKINS, JR	PAUL	Newark	NJ	7112	9/1/2008	\$20,000.00
Perluka (Unclear)	Kevin		FL			
Perrelli	Amber	Odenton	MD	21113	4/16/2008	

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Petryszyn	Rosemary	North Royalton	Ohio	44133		
Phillips	Lisa	Grants Pass	OR	97526	1/5/2009	
Phillips	Sean	Franklin	TN	37064	10/15/2010	
Phurrough	Cynthia	Mason	OH	45040	11/16/2010	
Piers	Janice	Carver	Massachusetts	2330		\$2,044.00
Pietrucha	Beryl	Callicoon	NY	12723	11/22/2010	\$369.00
Pitts	Robert	Little Elm	TX	75068	8/16/2010	
Posloncec	Victoria	Miami Beach	FL	33139		
Poulin	Cheryl	Hadley	MA	1035	Feb-07	\$2,694.00
Pray	Kimm	Apple Valley	MN	55124	Jun-07	\$2,645.00
Raadschelders	Julie	Norman	OK	73072	Feb-09	\$2,657.00
Rahach	Kelly	Richmond	OH	43944		\$2,877.00
Ramsey	Andrea	House Springs	MO	63051		
Randall	Elijah	Cypress	TX	77433	2/1/2010	
Rappl	Kayla	Lincoln	NE	68506	9/25/2010 11/25/	\$2,317.75
Rasmovicz	Joseph Michael	Larksville	PA	18651	9/1/2008 7:01:11	\$2,600.00
Rechtman	Alyssa	Costa Mesa	CA	92626	4/15/2009	\$553.00
Reckard	Amy	Fort Lauderdale	FL	33301		
Reegan	Doreen	Connelly	NY	12417	11/13/2007	\$510.00
REGULAR	VICTORIA	Los Angeles	CA	90057	9/1/2010 7/1/201	\$1,518.00
Rehermann	Suzanne	Winsted	CT	6098	11/17/2010	
Reid	Roy	Boyd	TX	76023	Mar-06	\$1,511.00
Remme	Nathan	Chatfield	MN	55923		
Resendez	Antonio	Colorado Springs	CO	80903		
Rettfchlag	Troy	Sun Prairie	Wisconsin	53590		
Rhead	Jennifer	Meridian	ID	83646	2/22/2008	\$4,117.00
Rhoades	Heather C.	Port Jervis	NY	12771		
Richmore	Reginol		FL			
Riebau	JoAnn	Denver	CO	80218	12/1/2010	\$1,590.00

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Rodriguez-Perez	Marta	Buffalo	NY	14201		
Rogers	Patrick	Avon Lake	OH	44012	3/20/2008	
Rogers	Laura	Hotchkiss	Colorado	81419	7/1/2008	\$1,895.00
Rosendo	Antonio	Colorado Springs	CO	80903	2006	\$1,595.00
Ross	Juan	Snellville	GA	30078	10/1/2010	
Ross	Peter	Wetumpka	AL	36093	8/25/2008	\$4,586.00
Rozell	Shelly	Lowman	NY	14861	Aug-04	\$1,600.00
Rubio	Anthony	Corona	CA	92880	9/6/2010	\$768.00
Saganowich	LARISSA	Germansville	PA	18053	10/5/2010	
Saganowich	Steven		FL			
Saluga	James	Girard	OH	44420		\$2,200.00
Sanchez	Peter	New Haven	CT	6515	2008	\$4,807.00
SASTRADINATA	HENDRA	Bellevue	WA	98009	3/15/2011	
Saxton	Bethany	Eagan	MN	55121		
Schank	Lonna	Westfield	IN	46074	2/26/2009	
Schmuck	Louis	Hubbard	OH	444225	4/15/2009	
Schofield	Vicki	Freeport	FL	32439	7/23/2007	
Scott	Bruce G.	Boise	Idaho	83709	4/30/2008	\$6,416.00
Scott	Argene	Boise	Idaho	83709	10-Aug	\$6,416.00
Secula	Joseph	Red Bank	NJ	7701	7/18/2006	\$5,732.00
Semcer	Jean A.	Naples	FL	34104	4/7/2007	\$3,396.00
Shellman	Sophia	Ft. Lauderdale	FL	33317		
Shirey	John	Orange City	Kansas	66523		
ShoemakerIII	B.W.	Woodville	TX	75979		
Shomin	Tanya	Houston	TX	77054	10/27/2010	\$5,597.00
Shook	Robert R.	Renovo	Pennsylvania	17764	2/25/2011	\$268.00
Similine	Van	Dallas	TX	75232		\$1,164.00
Simms	Martina	Accokeek	MD	20607	12/16/2008	\$6,916.00
Simon	Lewis	Virginia Beach	VA	23452		\$3,072.00



Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Sims	Lisa	Covington	WA	98042	3/7/2008	\$2,500.00
Sisk	Michael	Dyersburg	TN	38024	4/18/2007	
Sketch	John	Covington	KY	41015		
Sliwska	Marta	WestIslip	NY	11795	11/17/2010	
SMITH	RUSSELL	Louisville	KY	40217	2/28/2011 1:28:11 AM	
Smith	Marjorie	C	IL	60615		
Snowden	Brett	Springfield	MA	1118	7/9/2010	\$2,160.00
Snowden	Bradt		Massachusetts			
Sorensen	Susan	Mullica Hill	NJ	8062		
Springer	Elizabeth	Fishers	IN	46038	8/30/2010	\$450.00
Standard	Reagan	Gary	TX	75643		
Stephens	Christa	Savannah	GA	31405	1/5/2011	
STOFFER	LAURA	New Haven	IN	46774	Oct-08	\$5,000.00
Stokes	Lana	Paterson	NJ	7501	7/5/2010 8:05:10 AM	
STRADFORD III	JAMESE	Englewood	NJ	7631	11/2/2010	\$834.00
Streb	Kyle	New Philadelphia	OH	44663	Nov-08	\$1,803.00
Stripe	James	Van Wert	OH	45891	9/21/2010	
Stromberg	Edward D.	Newtown Square	Pennsylvania	19073	1/24/2007	
Stubbs	Matricia	Tampa	FL	33610	5/31/2010	
Sudak	Megan	Beverly	MA	1915	Feb-08	\$1,533.00
Summers	Yvonne E.	Telford	Tennessee	37690		
Swinehart	Justin	Selinsgrove	PA	17870	Feb-09	
Tafoya	Norma J.	Espanola	New Mexico	87532	8/9/2010	
Tafoya	Nicolette M.	Flagstaff	Arizona	86004	11/3/2008	\$3,136.00
Tanner	Edward S.	Savannah	Georgia	31406	6/1/2010	
Taylor	Vikki	Ashland	Ohio	44805		
Teague	Rosemary	Springtown	TX	76082		
Thomas	Deven	Bally	PA	19503		
Thomas	Rod D.	East Wenatchee	Washington	98802	10/27/2010	

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Thomas	Eugene	Valparaiso	IN	46368	11/18/2003	\$1,351.24
Thompson	Christopher	Indianapolis	IN	46237	6/5/2010	
Thompson	Dick	Memphis	TN	38117	6/1/2009	
Thompson	Brandon	Broken Arrow	OK	74011	9/24/2010	
Thompson	Courtney					
Toenyan	Laura	Inver Grove Heights	MN	55076	11/21/2010	
Tollner	Michael	Norwalk	CT	6854		
Toomey	Patrick	Summit	FL	32162	8/16/2007	\$2,600.00
Torio	Maureen	Marlton	NJ	8053	3/5/2009	\$1,218.00
Toro	Doreen	Spring Hill	FL	34609	6/21/2010	\$1,165.00
Toy-Hamilton	Christina	Knox	PA	16232	1/5/2006	\$1,351.24
Trimble-Moore	Theresa	OilCity	LA	71061	3/1/2010	\$1,195.00
Tsirulnik	Marina	Mayfield Heights	OH	44124		\$3,699.00
Tubbs-Nordlund	Heather	Seattle	WA	98136		\$355.00
Turnbull	Michael	Barnum	MN	55707	2/19/2006 2:19:1	\$674.00
Turner	Colin J.	Westville	NJ	8093	8/16/2010	
Turner,Jr	Lewis	Escondido	CA	92027	Jun-09	\$5,245.00
Twilegar	Deborah J.	Fort Myers	FL	33916		
Tyler-Sledge	Temberly	Florence	AL	35630	3/1/2010	\$1,800.00
Tyre	Bradley	Douglas	GA	31533	10/12/2010	
Ulrey	Lamar		FL			
Upchurch	Stephanie	HotSprings	AR	71913	7/1/2008	\$2,380.00
Venugopal	Manoj	Hamilton	OH	45011	11/15/2010	
Vierow	Jennifer	Lafayette	CO	80026	Apr-07	\$1,933.00
Villalpando	John	San Antonio	Texas	78254	12/3/2010	\$15,889.00
Vishnampet	Veda	Columbia	SC	29229	11/1/2010	\$3,500.00
Vogel	Timothy	Garrett	IN	46738	2/23/2007	\$2,120.00
Walcutt	Roberta	Oconomowoc	WI	53066	Dec-06	\$2,185.00
Walker	Shannon	Rockford	MN	55373	Jun-09	\$664.00

Last Name	First Name	City	State	Zip	TRXN Date	TRXN Amount
Wall (Kinney)	Holly	Marlton	NJ	8053	Jan-06	\$1,306.00
Wallis	Judy	Weatherford	TX	76088		\$1,500.00
Wara	Jerrie		FL			
Ware	Jerrea N.	Evington	Virginia	24550	10/1/2006	\$2,000.00
Watkins	Jorge	Beaumont	TX	77706		
Watson	Charles	Allen	TX	75002	9/29/2010 10:29:10 AM	
Watson	Tori	Allen	TX	75002		\$2,170.00
Weekley	Mary	Mccomb	MS	39648		
Wells	Tiffany	Reynoldsburg	OH	43068		\$469.00
Wentzel	Robert	LasVegas	NV	89123	10/31/2007	\$3,212.00
Whitaker	James	Asheboro	NC	27203	Sep-09	\$4,600.00
Whitaker-Pratt	Rebecca	Carthage	NC	28327	11/24/2009	\$1,621.00
Whitehead	Derrick	Gardner	MA	1440	5/1/2008 5/1/201	\$1,224.00
Whitehead	Derek		FL			
Whitfield	W Bruce	Covington	IN	47932	11/17/2010	
Whitfield	Eddie	LittleRock	AK	72206		\$964.00
Whitkop	Diana	Jacksonville	FL	32207	Jan-08	\$2,100.00
Whitmore	Reginald		FL			
Whittemore	Reginald	Antioch	TN	37013	12/1/2005	
Whitter	Jeannie	Chauvin	LA	70344		\$900.00
Wiebersch	Dominic	Spanaway	WA	98387		\$1,908.00
William	Christina		FL			
Williams	Alesia	Indianapolis	IN	46260	Feb-10	\$2,795.00
Williams	Debbie	Edmond	OK	73025	3/18/2010	\$1,072.00
Williams	Marcie	McAllen	TX	78504	6/5/2005	\$2,788.84
Williams	Adrean		FL			
Williams	Todd		FL			
William	Amos	Cleveland	OH	44111		\$652.00
Wilson	Vanessa	Jackson	MS	39206	7/20/2009	\$840.00



**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA**

**OFFICE OF THE ATTORNEY GENERAL,  
DEPARTMENT OF LEGAL AFFAIRS,  
STATE OF FLORIDA,**

Plaintiff,

Case No.: \_\_\_\_\_

vs.

**UNITED FINANCIAL SYSTEMS, INC.**, a Florida corporation; and **CHRISTOPHER BOULAHANIS**, individually,

Defendants.

\_\_\_\_\_ /

**STIPULATED PERMANENT INJUNCTION AND FINAL JUDGMENT**

This action came to be heard upon Plaintiff's Agreed Motion to Enter Stipulated Permanent Injunction and Final Judgment against Defendants **UNITED FINANCIAL SYSTEMS, INC. and CHRISTOPHER BOULAHANIS** (hereinafter collectively referred to as "Defendants"), the Defendants having agreed to enter into this Consent Permanent Injunction and Final Judgment ("Judgment"), the Defendants having stipulated to the findings of fact set forth below, and the Defendants having agreed that this Court has jurisdiction to enter a permanent injunction and final judgment in this matter, the Court makes the following findings:

1. Plaintiff Office of the Attorney General, Department of Legal Affairs, State of Florida (the "Department") is an agency of the state and the enforcing authority under the Florida Deceptive and Unfair Trade Practices Act, Florida Statutes Section 501.201 *et seq.*

2. United Financial Systems, Inc. ("United Financial") is a Florida corporation with a principal place of business registered as 1117 Banks Road, Margate, Florida 33063.

3. Christopher Boulahanis (“Boulahanis”) is a Florida resident residing at 23116 Sandalfoot Plaza Dr., Boca Raton, Florida 33428, and is the President and Vice President of United Financial.

4. The Department initiated an investigation into allegations that United Financial, including as directed and managed by Boulahanis, engaged in acts or practices in the State of Florida that were misleading, unfair, deceptive or unconscionable in the marketing, advertising, and performance of its business in the debt management business. The investigation by the Department has identified more than 500 consumer complaints relating to the alleged misconduct of Defendants.

5. To prevail on an action under the Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”), the plaintiff must show that “the alleged practice was likely to deceive a consumer acting reasonably in the same circumstances.” *Office of Attorney General, Department of Legal Affairs v. Wyndham International, Inc.*, 869 So. 2d 592, 598 (Fla. 1st DCA 2004).

6. To establish individual liability under FDUTPA, the plaintiff must show that the “individual defendant actively participated in or had some measure of control over the corporation’s deceptive practices.” *KC Leisure v. Haber*, 972 So.2d 1069, 1073 (Fla. 5th DCA 2008); *Office of the Attorney General v. Wyndham Int’l, Inc.*, 869 So. 2d 592, 598 (Fla. 1st DCA 2004) (“individual defendant may also be held liable for consumer redress under the [FTC] Act if they participated directly in the deceptive practices or acts or they possessed the authority to control them.”).

7. From at least January 1, 2008 through December 2010, United Financial and Boulahanis marketed, advertised, sold, and provided services to consumers relating to debt management and/or debt consolidation.

8. Boulahanis acted as the day-to-day manager of United Financial from at least January 1, 2008 through to the present. Boulahanis has been the primary participant and actively control and direct United Financial's business and operations. Boulahanis is individually liable for the wrongful conduct of United Financial alleged herein.

9. United Financial and Boulahanis represented to consumers that in exchange for monthly payments, United Financial would provide services to the consumers to reduce and/or restructure the consumer's debts, including distributing (after certain fees) the monthly payments made by the consumer to the consumer's creditors within eight (8) business days after payment.

10. United Financial debited consumers' bank accounts on a monthly basis, but failed to distribute the monies to the consumers' creditors in a timely manner or, in some cases, at all. Florida Statutes Section 817.805 requires that any debt management firm disburse the consumers' monies to their creditors within 30 days after receipt. United Financial violated Section 817.805 by repeatedly failing to disburse the consumers' monies to their creditors within 30 days. Hundreds of consumers paid monies through monthly account debits to United Financial, but United Financial failed to timely pay the consumers' creditors in accordance with Florida law or in accordance with the representations made by United Financial and Boulahanis.

11. In addition, United Financial charged consumers a "set-up fee" of \$75 or more, as well as "monthly processing charges" of up to \$69/month. Florida law prohibits the charging of a set-up fee of more than \$50 and monthly fees of more than 7.5% of the monthly amount paid or

\$35, whichever is greater. § 817.802, Fla. Stat. United Financial violated Section 817.802 by charging excessive monthly fees in violation of that statute.

12. Pursuant to Florida Statutes Section 817.806(1), any violation of Section 817.805 or Section 817.802 constitutes an unfair and deceptive trade practice in violation of FDUTPA. As such, United Financial and Boulahanis violated FDUTPA by the acts and practices of United Financial in violation of Sections 817.805 and 817.802.

13. The practices of the Defendants constitute unfair, deceptive and unconscionable trade practices that are likely to deceive a consumer acting reasonably in the same circumstances. Consumers seeking debt management services from United Financial have been deceived by Defendants' misrepresentations as to the payment of the consumers' creditors by United Financial and by the Defendants' failure to comply with the applicable Florida statutes governing the operations of debt management services.

14. Consumers in the State of Florida were actually injured by the unfair, deceptive and unconscionable practices of Defendants.

Based upon the foregoing factual findings and the consent of the parties, it is hereby

**ORDERED AND ADJUDGED:**

15. Final judgment is hereby entered in favor of the Office of the Attorney General, Department of Legal Affairs, State of Florida (the "Department"), 110 S.E. 6<sup>th</sup> Street, 10<sup>th</sup> Floor, Ft. Lauderdale, Florida 33301 and against Defendants United Financial and Christopher Boulahanis, jointly and severally, for violation of the Florida Deceptive and Unfair Trade Practices Act, Florida Statutes Section 501.201 *et seq.* for acts and practices relating to the sales, marketing, and provision of debt management services in the State of Florida to consumers that were unfair, deceptive and unconscionable.



16. The purpose of FDUTPA is to “protect the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce.” Section 501.202(2). To that end, “reasonable restrictions upon the future activities of any defendant to impede her or him [sic] from engaging in or establishing the same type of endeavor” are permitted by the Act, and courts may “order any defendant to divest herself or himself of any interest in any enterprise.” Section 501.207(3). Prohibiting business activities is constitutional when the limitation is rationally related to the State’s objective of preventing deceptive practices. *Fraternal Order of Police v. Dept. of State*, 392 So. 2d 1296, 1302 (Fla. 1980) (upholding regulations in the Law Enforcement Funds Act even though they were not “the best possible means to eradicate the evils perceived” because they were not “wholly unrelated” to the legislature's purpose). As such, a permanent injunction enjoining further provision of debt consolidation and/or debt management services is appropriate.

17. The Court hereby permanently enjoins Defendants United Financial and Christopher Boulahanis, as well as their officers, agents, servants, employees, and attorneys and on those persons in active concert or participation with them who receive actual notice of this Order, directly or indirectly, from the following:

a. Any acts or practices that violate or fail to comply with the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes or Florida Statutes Sections 817.801 through 817.806;

b. Marketing, advertising, selling, providing, processing, or contracting for or in connection with any debt management and/or debt consolidation services;

c. Destroying, mutilating, concealing, altering, or disposing of, in any manner, United Financial's books, records, contracts, financial records, consumer files and financial information, regardless of the manner in which it is stored, for a period of two (2) years from the date of this Judgment.

18. FDUTPA also authorizes reimbursement to consumers who have been damaged by deceptive trade practices. Section 501.207(3). It also authorizes recovery of the actual damages caused by the deceptive practices. Section 501.207(1)(b). All consumers who paid money in response to a deceptive trade practice are entitled to their money back, and there is no need for an individualized inquiry into how each consumer reacted to the practice. *F.T.C. v. Wilcox*, 926 F. Supp. 1091, 1105 (S.D. Fla. 1995); *F.T.C. v. People's Credit First*, No. 8:03-CV-2353-T, 2005 WL 3468588 (M.D. Fla. Dec. 18, 2005). All of these consumers set forth on Exhibit A hereto are entitled to reimbursement of the entire amount deceptively taken from them by the Defendants, and monetary damages are therefore awarded in the amount of \$\_\_\_\_\_.

19. Defendants are therefore jointly and severally liable and are ordered to pay consumer restitution in amount of refunds to all consumers for the amounts set forth on Exhibit A hereto, the total of which is \$\_\_\_\_\_ ("Restitution Amount"). The Restitution Amount shall be paid to the Department of Legal Affairs within 30 days of the date of this Order, which upon receipt shall be distributed by the Office of the Attorney General to the consumers suffering the losses as reflected in Exhibit A.

20. While restitution serves the purpose of restoring an injured person to the financial position held before a defendant received an unlawful benefit, with a civil penalty "the law exacts payment of by way of punishment for doing some act which is prohibited...." *Sun Coast Intern. Inc. v. Dept. of Business Regulation*, 596 So. 2d 1118, 1121 (Fla. 1st DCA 1992) (internal

citations omitted). Anyone who has used a trade practice found to be unlawful under the Act is liable for a civil penalty of up to \$10,000 per violation. § 501.2075, Fla. Stat. Each instance in which a deceptive representation is disseminated constitutes a violation. *U. S. v. Reader's Digest Ass'n, Inc.*, 662 F.2d 955, 966 (3d Cir. 1981). In this case, more than 500 transactions of unfair or deceptive conduct occurred in which the Defendants violated FDUTPA. Given the blatant nature of the violation and the egregiousness of the consumer harm, the appropriate penalty is at least \$1,000 per violation, for a total penalty of \$500,000.00. The Defendants are jointly and severally liable and ordered to pay civil penalties in the total amount of \$500,000 within 30 days of the date of this Judgment, which amount shall be payable to the Department of Legal Affairs Trust Fund and delivered to counsel for Plaintiff, René D. Harrod, 110 S.E. 6<sup>th</sup> Street, 10<sup>th</sup> Floor, Ft. Lauderdale, Florida within five (5) business days of this Judgment.

21. Section 501.2105 provides that the prevailing party may recover fees and costs from the non-prevailing party. *Humane Society of Broward County v. the Florida Humane Society*, 951 So. 2d 966, 969 (Fla. 4th DCA 2007); *Smith v. Bilgin*, 534 So. 2d 852, 854 (Fla. 1st DCA 1998). Plaintiff's counsel has submitted affidavits concerning time spent on the case and costs incurred, pursuant to Section 501.2105(2). The Court finds that the Office of the Attorney General is entitled to payment of its fees and costs in the amount of \$35,000. The Defendants therefore jointly and severally liable and are ordered to pay attorneys' fees and costs to Plaintiff in the amount of \$35,000 within 90 days of the date of this Judgment. Payment shall be made by cashier's check or other certified funds payable to Department of Legal Affairs Revolving Trust Fund.

22. Defendants shall each complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on the judgment

creditor's attorney, or the judgment creditor if the judgment creditor is not represented by an attorney, within 45 days from the date of this Judgment, unless the Judgment is satisfied or post-judgment discovery is stayed.

23. Defendants shall not affect any change in the form of doing business, or the organizational identity of any of the existing business entities, or create any new business entities, as a method of avoiding the terms and conditions set forth in this Judgment, which shall be binding on any successors or assigns of Defendants.

24. This Judgment is not a waiver of any private rights of any person or release of any private rights, causes of action, or remedies of any person against Defendants or any other person or entity.

25. Any failure to comply with the terms and conditions of this Judgment is by statute prima facie evidence of a violation of Chapter 501, Part II, Florida Statutes, and will subject Respondents to any and all civil penalties and sanctions authorized by law, including attorney's fees and costs. In the event that a court of competent jurisdiction makes a determination that a violation of any condition of this Judgment has occurred, then Respondents shall be jointly and severally liable for an additional \$500,000.00 (Five Hundred Thousand Dollars) in penalties, attorneys' fees and costs, and other relief, as allowed by law. The Department reserves the right to seek Chapter 501 penalties for any future violation(s) of Chapter 501, Part II, Florida Statutes.

26. Notwithstanding any other provision of this Judgment, nothing herein shall be construed to impair, compromise or affect any right of any government agency other than the Office of the Attorney General for the State of Florida.

27. This document is signed in anticipation of this Judgment being submitted to the Court for approval, without necessity of hearing, which is hereby WAIVED by all parties.

28. This Court retains jurisdiction of this case to enter further orders that are proper to compel compliance with this Judgment by contempt proceedings, civil and/or criminal.

29. The signatures below indicate the parties' consent and agreement to this Judgment:

**Agreed to:**

By: \_\_\_\_\_  
Christopher Boulahanis, individually  
23116 Sandalfoot Plaza Dr., Boca Raton, Florida 33428

By: \_\_\_\_\_  
Christopher Boulahanis, as President of United Financial Systems, Inc.  
1117 Banks Road, Margate, Florida 33063

STATE OF FLORIDA                    )  
COUNTY OF BROWARD                )

BEFORE ME, an officer duly authorized to take acknowledgments in the State of Florida, Christopher Boulahanis, personally appeared, individually, and as President of United Financial, Inc. a Florida corporation. He acknowledged before me that he executed the foregoing instrument for the purposes therein stated on the \_\_\_\_ day of \_\_\_\_\_, 2011.

Subscribed to before me this \_\_\_\_ day of \_\_\_\_\_, 2011.

\_\_\_\_\_  
NOTARY PUBLIC

\_\_\_\_\_  
(print, type, or stamp commissioned Notary Public)

Personally known \_\_\_\_\_ or Produced Identification \_\_\_\_\_ (check one)

Type of Identification Produced: \_\_\_\_\_

**Witnessed:** \_\_\_\_\_  
Robby Birnbaum, Esq., Florida Bar No. 175889  
Greenspoon Marder  
100 West Cypress Creek Road, Suite 700  
Fort Lauderdale, FL 33309  
*Counsel for Respondents*

**OFFICE OF THE ATTORNEY GENERAL**

By: \_\_\_\_\_

René D. Harrod  
Assistant Attorney General  
110 S.E. 6th Street, 9th Floor  
Fort Lauderdale, FL 33301  
(954) 712-4600  
(954) 712-4658 Facsimile

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Richard Lawson  
Director, Economic Crimes Division  
Department of Legal Affairs  
Office Of The Attorney General  
The Capitol  
Tallahassee, FL 32399-1050  
(850) 245-0140

Dated: \_\_\_\_\_

SO ORDERED. Approved and Entered in Chambers in Broward County, Florida this \_\_\_  
day of \_\_\_\_\_, 2011.

By: \_\_\_\_\_  
Circuit Court Judge