
 *
IN THE MATTER OF: *
 *
NICOLE DUBACH (“DUBACH”) *
 *
TRU-CONTACT INCORPORATED *
d/b/a TCI *
NMLS # 1099106 *
(“TRU-CONTACT”) *
 *
(Collectively “Respondents”) *
 *

**FINDINGS OF FACT,
 CONCLUSIONS OF LAW
 AND ORDER**

FINDINGS OF FACT

1. On March 28, 2019, the Banking Commissioner (“Commissioner”) issued a Temporary Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty, and Notice of Right to Hearing against Respondents and Tek-Collect Incorporated (collectively “Notice”). The Notice is incorporated by reference herein. (Tr. at 13; Hearing Officer Ex. 1.)
2. The Notice was issued pursuant to Sections 36a-50(a), 36a-51(a), 36a-52(a), and 36a-804 of the Connecticut General Statutes. (Hearing Officer Ex. 1.)
3. The Notice alleges that DuBach made false or misleading statements to the Commissioner in connection with a Department examination and Tru-Contact’s request to surrender its consumer collection agency license in Connecticut, in violation of Sections 36a-53a of the Connecticut General Statutes. The Notice advised DuBach that such violations form a basis to issue an order to cease and desist pursuant to Section 36a-52(a) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Section 36a-50(a) of the Connecticut General Statutes. (Hearing Officer Ex. 1.)
4. The Notice also alleges that DuBach employed a device, scheme or artifice to defraud, made an untrue statement of material fact or omitted to state a material fact necessary in order to make certain statements made, in light of the circumstances under which they are made, not misleading, and engaged in an act, practice or course of business which operated or would operate as a fraud or

deceit upon a person, in violation of Section 36a-53b of the Connecticut General Statutes. The Notice advised DuBach that such violations form a basis to issue an order to cease and desist pursuant to Sections 36a-52(a) and 36a-804(b) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Sections 36a-50(a) and 36a-804(b) of the Connecticut General Statutes. (Hearing Officer Ex. 1.)

5. The Notice also alleges that Tru-Contact employed a device, scheme or artifice to defraud, made an untrue statement of material fact or omitted to state a material fact necessary in order to make certain statements made, in light of the circumstances under which they are made, not misleading, and engaged in an act, practice or course of business which operated or would operate as a fraud or deceit upon a person, in violation of Section 36a-53b of the Connecticut General Statutes. The Notice advised Tru-Contact that such violations constitute grounds for the Commissioner to revoke Tru-Contact's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and 36a-51 of the Connecticut General Statutes and form a basis to issue an order to cease and desist pursuant to Sections 36a-52(a) and 36a-804(b) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Sections 36a-50(a) and 36a-804(b) of the Connecticut General Statutes. (Hearing Officer Ex. 1.)
6. The Notice also alleges that Tru-Contact failed to make its records available to and otherwise cooperate with the Commissioner, in violation of Section 36a-17(d) of the Connecticut General Statutes. The Notice advised Tru-Contact that such violations constitute grounds for the Commissioner to revoke Tru-Contact's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and 36a-51 of the Connecticut General Statutes and form a basis to issue an order to cease and desist pursuant to Sections 36a-52(a) and 36a-804(b) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Sections 36a-50(a) and 36a-804(b) of the Connecticut General Statutes. (Hearing Officer Ex. 1.)
7. The Notice also alleges that Tru-Contact's conduct rendered the Commissioner unable to determine that the financial responsibility, character, reputation, integrity, and general fitness of Tru-Contact are such to warrant belief that the business will be operated soundly and efficiently, in the public interest and consistent with the purposes of Sections 36a-800 to 36-814 of the Connecticut General Statutes. The Notice advised True-Contact that such conduct constitutes grounds for the Commissioner to revoke Tru-Contact's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and 36a-51 of the Connecticut General Statutes. (Hearing Officer Ex. 1.)
8. The Notice advised Respondents that if any Respondent did not request a hearing within the time period prescribed or failed to appear at any such hearing, the allegations would be deemed admitted and the Commissioner would issue an order (1) that such Respondent cease and desist from violating Sections 36a-53a, 36a-53b, and 36a-17(d) (as applicable) of the Connecticut General Statutes, (2) that Tru-Contact's consumer collection agency license would be revoked, and (3) imposing a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation upon each such Respondent. (Hearing Officer Ex. 1.)
9. On April 22, 2019, Respondents requested a hearing. (Tr. at 13; Hearing Officer Ex 2.)
10. On April 24, 2019, the Commissioner issued a Notification of Hearing and Designation of Hearing Officer stating that the hearing would be held on May 23, 2019, at 10 a.m. ("Hearing"), at the Department of Banking ("Department") and appointing Attorney Matthew Saunig as Hearing Officer. The Notification of Hearing and Designation of Hearing Officer also stated that the attorney representing the Department is Stacey Serrano, Staff Attorney. (Hearing Officer Ex. 1.)

11. At the Department's request, and after having received no objections from any of the parties involved and finding that good cause existed, the Hearing Officer severed Tek-Collect Incorporated from the proceedings against Respondents. (Tr. at 13-14; Hearing Officer Ex. 4.)
12. Through a series of electronic communications between the Hearing Officer, Respondents' counsel, and the Department on May 2, 2019; July 30, 2019; September 11, 2019; September 26, 2019; January 13, 2020; January 15, 2020; January 21, 2020; and January 23, 2020, the Hearing was rescheduled to February 5, 2020. (Tr. at 13-15; Hearing Officer Exs. 2, 5-12.)
13. On February 5, 2020, the Hearing was held at the Department. Attorney Serrano represented the Department. Attorney Stephen Manning represented the Respondents. (Tr. at 7.)
14. The Hearing was conducted in accordance with Chapter 54 of the Connecticut General Statutes, the "Uniform Administrative Procedure Act", and the Department's "Rules of Practice in Contested Cases", Sections 36a-1-19 to 36a-1-57, inclusive, of the Regulations of Connecticut State Agencies ("Regulations"). (Tr. at 8.)
15. Tru-Contact is a Michigan corporation with its main office at 1105 Schrock Road, Suite 503, Columbus, Ohio. Since October 28, 2013 Tru-Contact has been licensed to act as a consumer collection agency in Connecticut. Tru-Contact failed to renew its license and said license expired on January 1, 2019. (Hearing Officer Ex. 1.)
16. DuBach is a natural person who has been the sole owner, officer, and employee of Tru-Contact. (Hearing Officer Ex. 1.)
17. By email dated April 30, 2018, the Department commenced an examination of Tru-Contact and requested that certain information be provided. (Hearing Officer Ex. 1; Dept. Ex. 10.)
18. Respondents provided partial responses to the Department's requests and, after several extensions of the deadline to respond, Respondents failed to provide all of the information requested by the Department. (Tr. at 32-55; Hearing Officer Ex. 1; Dept. Ex. 11, 12, 14-21.)
19. On September 23, 2018, DuBach provided an affidavit to the Department indicating that Tru-Contact provided notice of its intent to surrender its Connecticut consumer collection agency license to three identified clients. Despite this statement, Tru-Contact provided notice to at least one other client who had placed Connecticut consumer debtor accounts with Tek-Collect for collection that was not identified in the affidavit. (Tr. at 56-58, 93-95; Hearing Officer Ex. 1; Dept. Ex. 22, 39, 40.)
20. On August 15, 2013, the Commissioner issued a Consent Order against Tek-Collect Incorporated requiring that Tek-Collect surrender its consumer collection agency license in Connecticut and that Tek-Collect be barred from acting as a consumer collection agency in Connecticut for a period of three years. Since the expiration of that three-year period, Tek-Collect has not applied for a consumer collection agency license in Connecticut and remains unlicensed to date. (Tr. at 70-71; Hearing Officer Ex. 1; Dept. Ex. 2.)
21. Tru-Contact acted in a manner to facilitate Tek-Collect's ability to collect on consumer debtor accounts in Connecticut without a license to do so. (Tr. at 77-103; Hearing Officer Ex. 1; Dept. Ex. 34-41, 46, 47, 51-55.)

22. From at least July 2016 to September 2018, Tru-Contact and Tek-Collect commingled operations and funds. Tru-Contact and Tek-Collect used the same form to enroll new clients. Tru-Contact's website stated that its leadership team had over 100 years' combined experience, even though its sole owner and employee appears to have no consumer collection agency experience. Bank statements evidence several wire transfers and deposits between Tek-Collect, Tru-Contact, and CAP360 Marketing Group LLC, including at least one payment from a Connecticut client to Tek-Collect for consumer collection services subsequently deposited by Tru-Contact. (Tr. at 59-103; Hearing Officer Ex. 1; Dept. Ex. 25, 26, 34-41, 46, 47, 51-55, 57-59.)
23. A maximum civil penalty of \$100,000 per violation may be imposed upon each Respondent pursuant to Section 36a-50(a) of the Connecticut General Statutes. A maximum civil penalty of \$100,000 per violation may be imposed upon DuBach based on a violation of Section 36a-53a of the Connecticut General Statutes. A maximum penalty of \$100,000 per violation may be imposed upon Tek-Collect based on a violation of Section 36a-17(d) of the Connecticut General Statutes. During the Hearing, the Department requested (1) a civil penalty of \$100,000 be imposed upon DuBach; and (2) a civil penalty of \$200,000 be imposed upon Tek-Collect. (Tr. at 10-185.)
24. At the Hearing, the Department also requested that Tru-Contact's Connecticut consumer collection agency license be revoked. (Tr. at 185.)

CONCLUSIONS OF LAW

The Commissioner has jurisdiction over the licensing and regulation of consumer collection agencies pursuant to Part XII of Chapter 669, Sections 36a-800 to 36a-814, inclusive, of the Connecticut General Statutes. The Notice issued by the Commissioner comported with the requirements of Section 4-177(b) of the Connecticut General Statutes. The Notice complied with the notice requirements of Sections 36a-50(a) [civil penalty], 36a-51(a) [revocation of license], and 36a-52(a) [cease and desist order] of the Connecticut General Statutes. Respondents received notice that the Hearing was originally scheduled for May 23, 2019 and then, after several mutually agreed upon extensions, rescheduled for February 5, 2020.

The Commissioner's broad regulatory authority includes the power to impose civil penalties pursuant to Section 36a-50(a) of the Connecticut General Statutes, to revoke licenses pursuant to Section 36a-51(a) of the Connecticut General Statutes, and to issue orders to cease and desist pursuant to Section 36a-52(a) of the Connecticut General Statutes.

Section 36a-50(a) of the Connecticut General Statutes provides, in pertinent part, that:

- (1) Whenever the commissioner finds as the result of an investigation that any person has violated any provision of the general statutes within the jurisdiction of the commissioner . . . the commissioner may send a notice to such person by . . . certified mail, return receipt requested The notice shall be deemed received by the person on the earlier of the date of actual receipt or seven days after mailing or sending. Any such notice shall include: (A) A statement of the time, place, and nature of the hearing; (B) a statement of the legal authority and jurisdiction under which the hearing is to be held; (C) a reference to the particular sections of the general statutes . . . alleged to have been violated; (D) a short and plain statement of the matters asserted; (E) the maximum penalty that may be imposed for such violation; and (F) a statement indicating that

such person may file a written request for a hearing on the matters asserted not later than fourteen days after receipt of the notice.

(2) If a hearing is requested within the time specified in the notice, the commissioner shall hold a hearing upon the matters asserted in the notice unless such person fails to appear at the hearing. After the hearing, if the commissioner finds that the person has violated any such provision . . . the commissioner may, in the commissioner's discretion and in addition to any other remedy authorized by law, order that a civil penalty not exceeding one hundred thousand dollars per violation be imposed upon such person. If such person . . . fails to appear at the hearing, the commissioner may, as the facts require, order that a civil penalty not exceeding one hundred thousand dollars per violation be imposed upon such person.

(3) Each action undertaken by the commissioner under this subsection shall be in accordance with the provisions of chapter 54.

Section 36a-51 of the Connecticut General Statutes provides, in pertinent part, that:

(a) The commissioner may suspend, revoke or refuse to renew any license issued by the commissioner under any provision of the general statutes by sending a notice to the licensee by registered or certified mail, return receipt requested . . . The notice shall be deemed received by the licensee on the earlier of the date of actual receipt or seven days after mailing or sending . . . Any such notice shall include: (1) A statement of the time, place, and nature of the hearing; (2) a statement of the legal authority and jurisdiction under which the hearing is to be held; (3) a reference to the particular sections of the general statutes, regulations, rules or orders involved; (4) a short and plain statement of the matters asserted; and (5) a statement indicating that the licensee may file a written request for a hearing on the matters asserted within fourteen days of receipt of the notice. . .

(b) If a hearing is requested within the time specified in the notice, the commissioner shall hold a hearing upon the matters asserted in the notice unless the licensee fails to appear at the hearing. After the hearing, the commissioner shall suspend, revoke or refuse to renew the license for any reason set forth in the applicable licensing provisions of the general statutes if the commissioner finds sufficient grounds exist for such suspension, revocation or refusal to renew . . . No such license shall be suspended or revoked except in accordance with the provisions of chapter 54.

(c) (1) Any licensee may surrender any license issued by the commissioner under any provision of the general statutes by surrendering the license to the commissioner in person or by registered or certified mail, provided, in the case of a license issued through the system, as defined in section 36a-2, such surrender shall be initiated by filing a request to surrender on the system. . . . Surrender of a license shall not affect the licensee's civil or criminal liability, or affect the

commissioner's ability to impose an administrative penalty on the licensee pursuant to section 36a-50 for acts committed prior to the surrender. . . . If no proceeding is pending or has been instituted by the commissioner at the time of surrender, or, in the case of a license issued through the system, at the time a request to surrender is filed, the commissioner may still institute a proceeding to suspend, revoke or refuse to renew a license under subsection (a) of this section up to the date one year after the date of receipt of the license by the commissioner, or, in the case of a license issued through the system, up to the date one year after the date of the acceptance by the commissioner of a request to surrender a license.

Section 36a-52(a) of the Connecticut General Statutes provides, in pertinent part, that:

(a) Whenever it appears to the commissioner that any person has violated, is violating or is about to violate any provision of the general statutes within the jurisdiction of the commissioner . . . the commissioner may send a notice to such person by . . . certified mail, return receipt requested The notice shall be deemed received by the person on the earlier of the date of actual receipt, or seven days after mailing or sending. Any such notice shall include: (1) A statement of the time, place, and nature of the hearing; (2) a statement of the legal authority and jurisdiction under which the hearing is to be held; (3) a reference to the particular sections of the general statutes . . . alleged to have been violated; (4) a short and plain statement of the matters asserted; and (5) a statement indicating that such person may file a written request for a hearing on the matters asserted within fourteen days of receipt of the notice. If a hearing is requested within the time specified in the notice, the commissioner shall hold a hearing upon the matters asserted in the notice, unless the person fails to appear at the hearing. After the hearing, the commissioner shall determine whether an order to cease and desist should be issued against the person named in the notice. If the person . . . fails to appear at the hearing, the commissioner shall issue an order to cease and desist against the person. No such order shall be issued except in accordance with the provisions of chapter 54.

Prior to October 1, 2018, Section 36a-17 of the Connecticut General Statutes provided, in pertinent part, that:

(c) For the purpose of any . . . examination . . . under this title the commissioner may . . . require written statements and require the production of any records which the commissioner deems relevant or material. . . .

(d) Any person who is the subject of any such . . . examination . . . shall make its records available to the commissioner in readable form; . . . provide copies or computer printouts of records when so requested; furnish unrestricted access to all areas of its principal place of business or wherever records may be located; and otherwise cooperate with the commissioner. . . .

(f) As used in this section, “records” includes, but is not limited to, books, papers, correspondence, memoranda, agreements, diaries, logs, notes, ledgers, journals, visual, audio, magnetic or electronic recordings, computer printouts and software, and any other documents.

Section 36a-53a of the Connecticut General Statutes provides, in pertinent part, that:

No person shall make or cause to be made orally or in any document filed with the commissioner or in any proceeding, investigation or examination under this title, any statement which is, at the time and in the light of the circumstances under which it is made, false or misleading in any material respect.

Section 36a-53b of the Connecticut General Statutes provides, in pertinent part, that:

No person shall, in connection with any activity subject to the jurisdiction of the commissioner: (1) Employ any device, scheme or artifice to defraud; (2) make any untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading; or (3) engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

Section 36a-801 of the Connecticut General Statutes provides, in pertinent part, that:

(a) No person shall act within this state as a consumer collection agency, directly or indirectly, unless such person has first obtained a required consumer collection agency license for such person's main office and for each branch office where such person's business is conducted. A consumer collection agency is acting within this state if it (1) has its place of business located within this state; (2) has its place of business located outside this state and (A) collects from consumer debtors, property tax debtors or federal income tax debtors who reside within this state for creditors who are located within this state, or (B) collects from consumer debtors, property tax debtors or federal income tax debtors who reside within this state for such consumer collection agency's own account; (3) has its place of business located outside this state and regularly collects from consumer debtors, property tax debtors or federal income tax debtors who reside within this state for creditors who are located outside this state; or (4) has its place of business located outside this state and is engaged in the business of collecting child support for creditors located within this state from consumer debtors who are located outside this state. . . .

(c)(2) If the commissioner finds, upon the filing of an application for a consumer collection agency, that (A) the financial responsibility, character, reputation, integrity and general fitness of the applicant, the control persons of the applicant, the qualified individual and any branch manager are such to warrant belief that the business will be operated soundly and efficiently, in the public interest and consistent with the purposes of sections 36a-800 to 36a-814, inclusive, and (B) the applicant

is solvent and no proceeding in bankruptcy, receivership or assignment for the benefit of creditors has been commenced against the applicant, the commissioner may, upon such finding, issue the applicant a consumer collection agency license. If the commissioner fails to make such findings, the commissioner shall not issue a license and shall notify the applicant of the reasons for such denial. . . .

Section 36a-804 of the Connecticut General Statutes provides, in pertinent part, that:

(a) The commissioner may suspend, revoke or refuse to renew any license or take any other action, in accordance with the provisions of section 36a-51, . . . if the commissioner finds that the licensee or any control person, qualified individual, branch manager, trustee, employee or agent of such licensee has done any of the following: (1) Made any material misstatement in the application or in any filing made in connection with the license; (2) committed any fraud or misrepresentation or misappropriated funds; or (3) violated any of the provisions of this title or of any regulation or order adopted or issued pursuant thereto pertaining to any such person, or any other law or regulation applicable to the conduct of such licensee's consumer collection agency business.

(b) Whenever it appears to the commissioner that (1) any person has violated, is violating or is about to violate any of the provisions of sections 36a-800 to 36a-814, inclusive, or any regulation adopted pursuant thereto, (2) any person is, was or would be a cause of the violation of any such provision or regulation due to an act or omission such person knew or should have known would contribute to such violation, or (3) the licensee or any control person, qualified individual, branch manager, trustee, employee or agent of such licensee has committed any fraud, made any misrepresentation or misappropriated funds, the commissioner may take action against such person or licensee in accordance with sections 36a-50 and 36a-52.

Based upon the record, DuBach made false or misleading statements to the Commissioner in connection with a Department examination and Tru-Contact's request to surrender its consumer collection agency license in Connecticut, in violation of Section 36a-53a of the Connecticut General Statutes, which forms a basis to issue an order to cease and desist pursuant to Section 36a-52(a) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Section 36a-50(a) of the Connecticut General Statutes.

Based upon the record, DuBach employed a device, scheme or artifice to defraud, made an untrue statement of material fact or omitted to state a material fact necessary in order to make certain statements made, in light of the circumstances under which they are made, not misleading, and engaged in an act, practice or course of business which operated or would operate as a fraud or deceit upon a person, in violation of Section 36a-53b of the Connecticut General statutes, which forms a basis to issue an order to cease and desist pursuant to Sections 36a-52(a) and 36a-804(b) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Sections 36a-50(a) and 36a-804(b) of the Connecticut General Statutes.

Based upon the record, Tru-Contact employed a device, scheme or artifice to defraud, made an untrue statement of material fact or omitted to state a material fact necessary in order to make certain statements made, in light of the circumstances under which they are made, not misleading, and engaged in an act, practice or course of business which operated or would operate as a fraud or deceit upon a person, in violation of Section 36a-53b of the Connecticut General Statutes, which constitutes grounds for the Commissioner to revoke Tru-Contact's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and 36a-51 of the Connecticut General Statutes and forms a basis to issue an order to cease and desist pursuant to Sections 36a-52(a) and 36a-804(b) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Sections 36a-50(a) and 36a-804(b) of the Connecticut General Statutes.

Based upon the record, Tru-Contact failed to make its records available to and otherwise cooperate with the Commissioner, which constitutes grounds for the Commissioner to revoke Tru-Contact's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and 36a-51 of the Connecticut General Statutes and forms a basis to issue an order to cease and desist pursuant to Sections 36a-52(a) and 36a-804(b) of the Connecticut General Statutes, and an order imposing civil penalty pursuant to Sections 36a-50(a) and 36a-804(b) of the Connecticut General Statutes.

Based upon the record, Tru-Contact's conduct rendered the Commissioner unable to determine that the financial responsibility, character, reputation, integrity, and general fitness of Tru-Contact are such to warrant belief that the business will be operated soundly and efficiently, in the public interest and consistent with the purposes of Sections 36a-800 to 36-814 of the Connecticut General Statutes, which constitutes grounds for the Commissioner to revoke Tru-Contact's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and 36a-51 of the Connecticut General Statutes.

ORDER

Having read the record, I hereby **ORDER**, pursuant to Sections 36a-50(a), 36a-51(a), and 36a-52(a) and 36a-804 of the Connecticut General Statutes, that:

1. Nicole DuBach **CEASE AND DESIST** from violating Section 36a-53a of the Connecticut General Statutes;
2. Nicole DuBach **CEASE AND DESIST** from violating Section 36a-53b of the Connecticut General Statutes;
3. Tru-Contact Incorporated **CEASE AND DESIST** from violating Section 36a-53b of the Connecticut General Statutes;
4. Tru-Contact Incorporated **CEASE AND DESIST** from violating Section 36a-17(d) of the Connecticut General Statutes;
5. Tru-Contact Incorporated's consumer collection agency license be **REVOKED** pursuant to Section 36a-804(a) and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes;
6. **A CIVIL PENALTY** of One Hundred Thousand Dollars (\$100,000) be imposed upon Nicole DuBach, to be remitted to the Department by cashier's check, certified check or money order, made payable to "Treasurer, State of Connecticut", no later than thirty (30) days from the date the Order is mailed;

7. A **CIVIL PENALTY** of Two Hundred Thousand Dollars (\$200,000) be imposed upon Tru-Contact Incorporated, to be remitted to the Department by cashier's check, certified check or money order, made payable to "Treasurer, State of Connecticut", no later than thirty (30) days from the date the Order is mailed;
8. This Order shall become effective when mailed.

Dated at Hartford, Connecticut,
this 18th day of June 2020.

_____/s/_____
Jorge L. Perez
Banking Commissioner

CERTIFICATION

This Order was sent by certified mail, return receipt requested, to Nicole Dubach and Tru-Contact Incorporated d/b/a TCI on behalf of Respondents and hand delivered to Stacey Serrano, Staff Attorney, State of Connecticut Department of Banking on June 26, 2020.

Nicole DuBach
c/o Attorney Stephen Manning
Spears Manning and Martini LLC
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Southport, Connecticut 06103

Certified Mail No. 7019 1640 0000 1584 9157

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