

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.  
THOMAS J. MILLER,  
ATTORNEY GENERAL OF IOWA,  
99AG25112,

Plaintiff,

v.

XENTEL, INC.,  
a Delaware corporation,

Defendant.

Equity No. 47655

PETITION IN EQUITY

CLERK DISTRICT COURT  
POLK COUNTY IA  
03 NOV 18 AM 8:40

The State of Iowa ex rel. Attorney General Thomas J. Miller, through Assistant Attorney General Steve St. Clair, states as follows for its cause of action against the above-named defendant.

**INTRODUCTION**

1. Xentel, Inc. (hereafter "Xentel") is a professional fundraiser that uses misleading telemarketing pitches designed to exploit the public's support for firefighters in order to line its own pockets. Xentel's telemarketers trick Iowans into believing that the callers are themselves firefighters, that donations will benefit local firefighters, and that most or all of the money donated goes to help firefighters. In fact, Xentel's callers are professional telemarketers, not firefighters; little or no support typically goes to a donor's local fire department; and about 75% of the money is kept by Xentel and never supports any firefighters. In effect, Xentel uses some carefully crafted deceptions, coupled with the justifiably positive public image of the firefighting profession, to divert to its own benefit charitable dollars that might otherwise go to far worthier recipients, including local fire departments.