

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

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

Plaintiff,

v.

ROGER T. CARLSON and
CARLSON TECHNOLOGIES, INC.
d/b/a/ TRI-STAR DISTRIBUTING,

Defendants.

EQUITY NO. CE

51749

PETITION

CLERK DISTRICT COURT

05 AUG 30 PM 2:09

POLK COUNTY IA

FILED

COMES NOW the State of Iowa ex rel. Attorney General of Iowa, Thomas J. Miller, by Assistant Attorney General Benjamin E. Bellus, pursuant to the provisions of Iowa Code § 714.16 (2005), commonly referred to as the Iowa Consumer Fraud Act, and for its claim against Defendants Roger T. Carlson and Carlson Technologies, Inc., d/b/a Tri-Star Distributing, states as follows:

INTRODUCTION

1. Roger Carlson and Carlson Technologies, Inc., sell and service vacuum cleaners and other home care products through telemarketing and door-to-door sales. Although sometimes straying from their standard scheme, Carlson and Carlson Technologies, Inc. normally make initial contact with potential customers by telephoning Iowans under the auspices of performing marketing research. Consumers are encouraged to answer personal questions by the representation that they might win a valuable prize if they cooperate in a survey. In fact, the research is performed solely to screen Iowans for a visit by a door-to-door salesman and all consumers that meet the screening criteria are called back and informed that they have won, or have been awarded, a valuable voucher for a free hotel stay at a vacation destination site such as Miami Beach, Florida or Puerto Vallarta, Mexico. The vouchers are of negligible cost to Carlson and Carlson Technologies and are little more