

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND,
Plaintiff,

v.

CENTURION FILING SERVICES, LLC,
d/b/a RI CERTIFICATE SERVICE,
BUSINESS DOCUMENT CENTER LLC,
and DEAN MARSHLACK,
Defendants.

C.A. No.: PC-22-00920

ASSURANCE OF VOLUNTARY COMPLIANCE

1. The State of Rhode Island by and through Attorney General Peter F. Neronha, brought the above-captioned action against Defendants Centurion Filing Services, LLC, d/b/a RI Certificate Service, and Dean Marshlack, individually (collectively “Defendants”).

2. This Assurance of Voluntary Compliance (“AVC”) is a consent agreement between the parties and is entered into and executed with the full knowledge that the allegations of fact and law contained herein constitute allegations of violations of R.I. Gen. Laws § 6-13.1-1, *et seq*, entitled the “Deceptive Trade Practices Act.”

AUTHORITY

3. The State of Rhode Island, by and through Attorney General Peter F. Neronha, has the authority, pursuant to R.I. Gen. Laws § 6-13.1-6, to accept an AVC in full settlement of this matter with respect to Defendants’ alleged violations of the Deceptive Trade Practices Act.

JURISDICTION

4. The Superior Court of Providence County has jurisdiction over the subject matter and the parties hereof pursuant to R.I. Gen. Laws § 6-13.1-5(b) and R.I. Gen. Laws § 9-5-33.

BACKGROUND

5. Defendant Centurion Filing Services, LLC (“Centurion”) is a limited liability corporation incorporated under the laws of Florida, with its principal place of business located at 412 E. Madison Street, Suite 817, Tampa, Florida, 33602.

6. Defendant Dean Marshlack (“Marshlack”) is a resident of the State of Florida. Marshlack is a member of Centurion. In that role, Marshlack oversees and engages in the day-to-day operations of Centurion. During all relevant time periods, Marshlack exercised complete control over the activities of Defendant Centurion and its d/b/a RI Certificate Service.

7. In November of 2020, Marshlack registered Centurion to do business in Rhode Island.

8. The Rhode Island Secretary of State issues Certificates of Good Standing to verify that a business entity is in good standing with the Secretary of State. Non-profit entities can currently obtain a certificate for seven dollars (\$7.00) and all other entities can obtain one for twenty-two dollars (\$22.00).

9. Defendant Centurion sent solicitations to newly registered entities in Rhode Island inviting them to purchase a certificate through Centurion in exchange for a \$84.50 fee.

10. The Attorney General alleges that Defendant Centurion’s mailings were deceptive and misleading, creating the false impressions that businesses were required to purchase a Certificate of Good Standing and that the mailing was an official mailing from the State of Rhode Island, when in fact, they were solicitations for services from Defendant Centurion.

11. Defendants’ agreement with and approval of this AVC shall not be deemed an admission of liability. Defendants enter this AVC because they wish to resolve their dispute with the State of Rhode Island amicably and without further litigation.

INJUNCTIVE RELIEF

12. Defendants agree to refrain from sending any mailings to Rhode Island consumers, entities, non-profit organizations, or other persons, natural or otherwise, in the future.

13. Defendants shall comply with all provisions of Rhode Island law.

RESTITUTION

14. Defendants shall provide restitution of the fee charged by Centurion to all Rhode Island consumers or business entities who request a refund of their fee within ninety (90) days of the date this AVC is approved by the Superior Court. Rhode Island consumers or businesses may submit their request for a refund to the Rhode Island Office of the Attorney General, which will transmit all requests received to Defendants by the end of the ninety (90) day period. Defendants shall provide full refunds to each Rhode Island consumer within thirty (30) days of receiving the requests.

PENALTIES

15. Defendant Centurion shall pay civil penalties to the Office of the Attorney General in the amount of \$25,000.01. This shall be made in three equal payments of \$8,333.34 made within thirty (30), sixty (60), and ninety (90) days after the date this AVC is approved by the Superior Court.

OTHER TERMS

16. Defendants agree that this AVC shall be binding on each Centurion and Marshlack, and their successors and assigns.

17. The Attorney General hereby releases and discharges the claims against Defendants Centurion, RI Certificate Service and Dean Marshlack alleged in the Complaint filed on May 17, 2022, for the case entitled *State of Rhode Island v. Centurion Filing Services, LLC, d/b/a RI Certificate Service, Business Document Center, LLC, and Dean Marshlack*, PC-2022-00920.

18. The Superior Court of Providence Rhode Island shall have jurisdiction over this AVC and the parties hereto for the purpose of enabling the Attorney General to apply to this Court at any

time for orders and directions as may be necessary or appropriate to enforce compliance with, or to punish violations of, this AVC.

19. Acceptance of this AVC by the Rhode Island Attorney General's Office shall not be deemed approval by the Attorney General of any practices or procedures of Defendants not required by this Assurance, and Defendants shall make no representations to the contrary.

NOTICE

20. Any and all notices to Defendants shall be sent to Centurion Filing Services, LLC, 412 E. Madison Street, Suite 817, Tampa, Florida 33602 by way of certified mail return receipt requested with a copy of said notices to be sent to Ryan C. Hurley, Kiernan, Plunkett & Redihan, LLP, 146 Westminster St. 5th Floor, Providence, RI 02903 via first class mail

21. Defendants shall notify the Attorney General of any change of business name or address within twenty (20) days by mailing a notice to:

Consumer Protection Unit
Rhode Island Office of the Attorney General
150 South Main Street
Providence, RI 02903

EFFECTIVE DATE

22. This AVC shall take effect immediately upon execution by the parties.

APPROVAL BY COURT

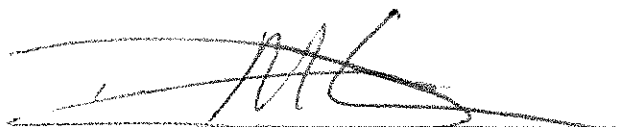
APPROVED and SO ORDERED. Signed:

/s/ R. David Cruise
~~Associate Justice~~

FOR THE STATE OF RHODE ISLAND

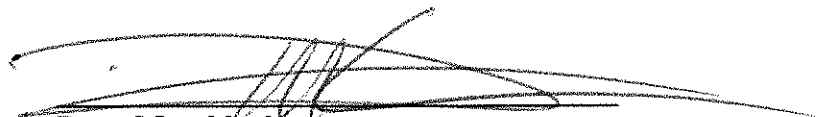
PETER F. NERONHA
ATTORNEY GENERAL
BY HIS ATTORNEY,

By: /s/ Stephen N. Provazza Date: January 20, 2023
Stephen N. Provazza (Bar No. 10435)
Special Assistant Attorney General
150 South Main Street
Providence RI, 02903
SProvazza@riag.ri.gov
(401) 274-4400



Centurion Filing Services, LLC
Name of Representative: Dean Marshlack

Dated: 1/11/23



Dean Marshlack

Dated: 1/11/23