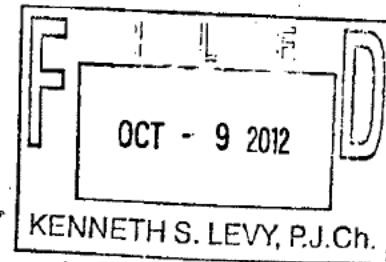


JEFFREY S. CHIESA
ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street - 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Attorney for Plaintiffs



By: Jeffrey Koziar
Deputy Attorney General
[REDACTED] [REDACTED]

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION,
ESSEX COUNTY
DOCKET NO.: C-200-11

JEFFREY S. CHIESA, Attorney General of the
State of New Jersey, and ERIC T. KANEFSKY¹,
Acting Director of the New Jersey Division of
Consumer Affairs,

Plaintiffs,

v.

THE PROJECT FREEDOM FUND and BRUCE
S. BUCCOLO, individually and as owner and
operator of THE PROJECT FREEDOM FUND
and JOHN DOES 1-10, individually and as
owners, officers, directors, founders, managers,
agents, servants, employees, representatives
and/or independent contractors of THE PROJECT
FREEDOM FUND, and XYZ CORPORATIONS
1-10.

Defendants.

Civil Action

**FINAL JUDGMENT BY
DEFAULT AND ORDER**

¹ This action was commenced on behalf of Paula T. Dow, former New Jersey Attorney General and Thomas R. Calcagni, former Director. Pursuant to R. 4:34-4, the caption has been revised to reflect the current Attorney General and Acting Director.

THIS MATTER was opened to the Court on the application of Jeffrey S. Chiesa, Attorney General of the State of New Jersey, and Eric T. Kanefsky, Acting Director of the New Jersey Division of Consumer Affairs ("Director") (collectively referred to as "Plaintiffs")² (by Jeffrey Koziar, Deputy Attorney General, appearing) by way of a Complaint filed on August 23, 2011, alleging that defendants The Project Freedom Fund and Bruce S. Buccolo, (collectively "Defendants") have engaged in conduct in violation of the New Jersey Consumer Fraud Act., N.J.S.A. 56:8-1 et. seq. ("CFA"), and the Regulations Governing General Advertising Practices, N.J.A.C. 13:45A-9.1 et seq. ("Advertising Regulations").

On December 12, 2011 and at Plaintiffs' request, the Clerk of the Court entered default against Defendants for failure to answer or otherwise plead. To date, Defendants have not answered or otherwise pleaded or moved to vacate the entry of default.

THIS COURT NOW FINDS THAT:

- A. The Court has jurisdiction over the subject matter of this action and over all named and served defendants hereto.
- B. Based upon all of the evidence submitted by Plaintiffs, including the Certifications of Jeffrey Koziar, with accompanying exhibits, and the Certifications of Aziza Salikhov, with accompanying exhibits, Defendants have engaged in conduct which comprises 210 violations of the CFA and the Advertising Regulations.

² This action was commenced on behalf of former Attorney General Paula T. Dow, and former Director Thomas R. Calcagni. Pursuant to R. 4:34-4, the caption has been revised to reflect the current Attorney General and Acting Director.

THEREFORE, IT IS on this 9⁺ day of October, 2012.

1. **ORDERED** that the acts and omissions of Defendants constitute multiple violations of the CFA, N.J.S.A. 56:8-1 et. seq., including unconscionable commercial practices, misrepresentations, false promises and deception, as well as violations of the Advertising Regulations, N.J.A.C. 13:45A-9.1 et seq.

2. **IT IS FURTHER ORDERED** that Defendants and their officers, directors, shareholders, founders, owners, agents, servants, employees, sales representatives, independent contractors, attorneys, corporations, subsidiaries, affiliates, successors, assigns and all other persons or entities in active concert or participation with it are permanently enjoined from engaging in, continuing to engage in, or doing any acts or practices in violation of the CFA, N.J.S.A. 56:8-1 et. seq., and the Advertising Regulations, N.J.A.C. 13:45A-9.1 et seq. including, but not limited to, the acts and practices alleged in the Complaint.

3. **IT IS FURTHER ORDERED** that Defendants are permanently enjoined from advertising, offering for sale, selling or providing any service that involves the provision or referral of legal assistance, legal services or legal representation.

4. **IT IS FURTHER ORDERED** that Defendants, jointly and severally, shall pay to the New Jersey Division of Consumer Affairs ("Division") consumer restitution in the total amount of \$26,265.00 as authorized by N.J.S.A. 56:8-8. The funds paid by Defendant pursuant to this section of the Final Judgment by Default and Order ("Judgment and Order") shall be used for equitable relief including, but not limited to, consumer redress and any attendant expenses for the administration of any redress fund. If Plaintiffs determine, in their sole discretion, that redress to consumers is wholly or partially impracticable, any funds not so used shall be retained

by the Division in lieu of redress. Defendants shall have no right to contest the manner of distribution chosen by Plaintiffs. Plaintiffs in their sole discretion may use a designated agent to administer consumer redress.

5. **IT IS FURTHER ORDERED** that Defendants, jointly and severally, shall pay to the Division civil penalties in the total amount of \$ 2,100,000. in accordance with N.J.S.A. 56:8-13.

6. **IT IS FURTHER ORDERED** that Defendants, jointly and severally, shall reimburse Plaintiffs for all attorneys' fees incurred in the prosecution of this action, in the total amount of \$50,564.00, for the use of the State of New Jersey, as authorized by the CFA, N.J.S.A. 56:8-19.

7. **IT IS FURTHER ORDERED** that Defendants, jointly and severally, shall reimburse Plaintiffs for their investigative costs and fees, in the total amount of \$13,150.88 for the use of the State of New Jersey, as authorized by the CFA, N.J.S.A. 56:8-11 and N.J.S.A. 56:8-19.

8. **IT IS FURTHER ORDERED** that Defendants shall pay the aggregate amount of \$63,714.88 within ten (10) days of the date of this Judgment and Order.

9. **IT IS FURTHER ORDERED** that nothing contained in this Judgment and Order, including the Court's determination herein, shall bind or affect the rights of any persons, not a party hereto, or preclude actions against unnamed parties.

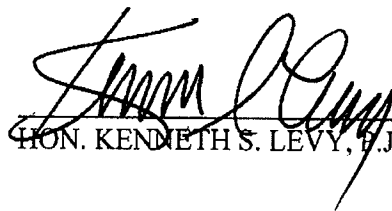
10. **IT IS FURTHER ORDERED** that nothing contained in this Judgment and Order shall bind or affect any position which any party may take in future or unrelated actions.

11. **IT IS FURTHER ORDERED** that this Judgment and Order may be enforced

only by Plaintiffs or Defendants or their successors hereto.

12. **IT IS FURTHER ORDERED** that this Court retains jurisdiction for the purpose of enabling Plaintiffs or Defendants to apply to this Court for any such order and directions as may be necessary and appropriate for the enforcement of, or compliance with, this Judgment and Order.

13. **IT IS FURTHER ORDERED** that a copy of this Judgment and Order shall be served upon Defendants within seven (7) days of this Judgment and Order.


HON. KENNETH S. LEVY, F.J.CH.

In accordance with the required statement of R. 1:6-2(a), this motion was _____
opposed ☒ unopposed.