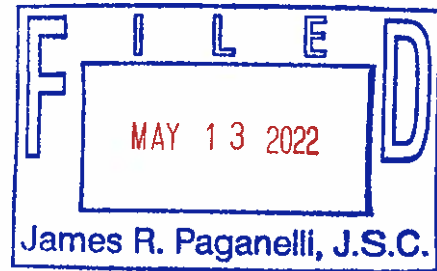


MATTHEW J. PLATKIN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street, 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Attorney for Plaintiffs



By: Monica E. Finke (332512020)
Deputy Attorney General
(973) 648-4142

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, ESSEX COUNTY
DOCKET NO. ESX-C-204-21

MATTHEW J. PLATKIN, Acting Attorney General
of the State of New Jersey, and SEAN P.
NEAFSEY, Acting Director of the New Jersey
Division of Consumer Affairs,

Plaintiffs,

v.

WILLIAMS ANDREWS BURNS LLC; WILLIAM
O'HANLON, individually and as owner, officer,
director, founder, member, manager, employee,
servant, representative and/or agent of WILLIAMS
ANDREWS BURNS LLC; JOHN AND JANE
DOES 1-20, individually and as owners, officers,
directors, shareholders, founders, members,
managers, employees, servants, agents,
representatives and/or independent contractors of
WILLIAMS ANDREWS BURNS LLC; and XYZ
CORPORATIONS 1-20,

Defendants.

Civil Action

**FINAL ORDER ON DEFAULT
AS TO DEFENDANTS
WILLIAMS ANDREWS BURNS
LLC AND WILLIAM O'HANLON**

THIS MATTER was opened to the Court on the application of plaintiffs Matthew J. Platkin, Acting Attorney General of the State of New Jersey, and Sean P. Neafsey, Acting Director of the New Jersey Division of Consumer Affairs (collectively, "Plaintiffs"), (by Monica E. Finke,

Deputy Attorney General, appearing), by way of a Complaint filed on November 5, 2021, alleging that Williams Andrews Burns LLC (“Williams Andrews Burns”) and William O’Hanlon (“O’Hanlon”) (collectively, “Defendants”) have, directly or through others, engaged in conduct in violation of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-1 to -227 (“CFA”) and the Regulations Governing General Advertising, N.J.A.C. 13:45A-9.1 to -9.8 (“Advertising Regulations”).

On February 18, 2022, the Court entered upon the docket the default of Defendants. Defendants have not moved to vacate the default entered against them.

THIS COURT NOW FINDS THAT:

A. The Court has jurisdiction over the subject matter of this action and over the named Defendants.

B. Based upon the evidence submitted by Plaintiffs, including the Certification of Investigator Walter Kaminski with accompanying exhibits, Certification of Deputy Attorney General Monica E. Finke with accompanying exhibits, Certification of Consumer Esther An with accompanying exhibits, Certification of Consumer Debra Brunner, Certification of Consumer Carey Clements with accompanying exhibits, Certification of Consumer Janice Fortier with accompanying exhibits, Certification of Consumer John David Lagerman with accompanying exhibits, Certification of Consumer Judith Wells McConnell with accompanying exhibits, Certification of Consumer Wendy Reichhelm with accompanying exhibits, Certification of Consumer Joan Reid with accompanying exhibits, Certification of Consumer Carol Morse Rick with accompanying exhibits, Certification of Consumer Travis Tunstill with accompanying exhibits, and Certification of Consumer Melvin Wright with accompanying exhibits, Defendants have engaged in conduct which comprises 782 violations of the CFA and the Advertising

Regulations with the following breakdown: (a) Unconscionable Commercial Practices (N.J.S.A. 56:8-2) – 463 violations; (b) False Promises and/or Misrepresentations (N.J.S.A. 56:8-2) – 175 violations; (c) violations of the Advertising Regulations (N.J.A.C. 13:45A-9.2(a)(9)) – 69 violations; and (d) violations that caused pecuniary injury to senior citizens (N.J.S.A. 56:8-14.3) – 75 violations.

THEREFORE, IT IS on this 13th day of May 2022:

1. **ORDERED** that the acts and practices of Defendants constitute multiple instances of unlawful practices in violation of the CFA and the Advertising Regulations.

2. **IT IS FURTHER ORDERED** that Defendants and their owners, officers, directors, shareholders, founders, members, managers, agents, servants, employees, representatives, independent contractors and all other persons or entities directly under their control, are permanently enjoined from engaging in, continuing to engage in, or doing any acts or practices in violation of the CFA and the Advertising Regulations.

3. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-8, Defendants are permanently enjoined from owning, operating or otherwise managing any business or other entity in the State, whether registered with the Division of Consumer Affairs or not, that advertises, offers for sale, sells, and/or performs rental and sales assistance services for timeshare owners (“Rental Services”), and/or services to collect or recover money for consumers who allegedly lost money in previous scams (“Collections Services”).

4. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-8, Defendants are permanently enjoined from the advertisement, offer for sale, sale and performance of Rental Services and/or Collections Services within the State of New Jersey.

5. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-8, the Certificate of Formation in the State of New Jersey for Williams Andrews Burns is permanently canceled.

6. **IT IS FURTHER ORDERED** that William O’Hanlon is personally liable for the violations of the CFA and the Advertising Regulations committed by Williams Andrews Burns.

7. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-8, Defendants, jointly and severally, shall pay to Plaintiffs consumer restitution in the total amount of \$448,135.00. The funds paid by Defendants 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 of Consumer Affairs 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.

8. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-13, Defendants, jointly and severally, shall pay to the Division civil penalties in the total amount of \$9,320,000.00.

9. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-19, Defendants, jointly and severally, shall reimburse Plaintiffs for all attorneys’ fees incurred in the prosecution of this action, in the total amount of \$384,326.50.

10. **IT IS FURTHER ORDERED** that, pursuant to the CFA, N.J.S.A. 56:8-11, Defendants, jointly and severally, shall reimburse Plaintiffs for their investigative costs, in the total amount of \$39,531.11.

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

12. **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.

13. **IT IS FURTHER ORDERED** that this Judgment and Order may be enforced only by Plaintiffs or Defendants or their successors hereto.

14. **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 further orders and directions as may be necessary and appropriate for the enforcement of, or compliance with, this Judgment and Order.



HON. JAMES R. PAGANELLI, J.S.C.

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