

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Consumer Financial Protection Bureau and the People of the State of New York, by Letitia James, Attorney General for the State of New York,

Plaintiffs,

v.

RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz,

Defendants.

Civil Action No. 1:17-CV-00890-LAP

[Proposed] Stipulated Final Judgment and Order

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The Consumer Financial Protection Bureau (“Bureau”) and the People of the State of New York (“State of New York” or “NYAG”) (together “Plaintiffs”) commenced this civil action against Defendants RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz. By this Stipulated Judgment and Order (the “Order”), without adjudication of any issue of fact or law, the Parties agree to resolve all matters in dispute arising from the conduct alleged in this action on the following terms.

1. The Court has personal jurisdiction over the parties and subject matter jurisdiction of this action.
2. Defendants<sup>1</sup> neither admit nor deny any allegations in the Amended Complaint.
3. The Parties waive all rights to seek judicial review or otherwise challenge or contest the validity of this Order and Defendants waive any claim they may have under the Equal Access to

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<sup>1</sup> “Defendants” means RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz, and their successors and assigns, individually, collectively, or in any combination.

Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action to the date of this Order.

4. As the Amended Complaint in this action alleges, Affected Individuals<sup>2</sup> were harmed in the amount of the payments they made to Defendants in excess of the funds that they received from Defendants.

5. The Parties agree that entry of this Order is in the best interest of all Parties and agree that in order to resolve all matters in dispute arising from the conduct alleged in this action:

- a. Defendants, whether acting directly or indirectly, shall refrain from participating in, or Assisting Others<sup>3</sup> in participating in Victim Compensation Fund Funding,<sup>4</sup> including, but not limited to, offering, brokering, or providing credit or advances of funds to individuals entitled to payments from the Zadroga Fund; and
- b. Defendants shall not take any action to collect any unpaid or future amounts owed by Affected Individuals, which totals at least \$600,000.00. If Defendants *sua sponte* receive any such payment from an Affected Individual or on behalf of an Affected

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<sup>2</sup> “Affected Individuals” means any of the twelve individuals who received monetary compensation from the Zadroga Fund and received money from any of the Defendants.

<sup>3</sup> “Assisting Others” includes, but is not limited to: i. consulting in any form whatsoever; ii. providing paralegal or administrative support services; iii. performing customer service functions, including but not limited to, receiving or responding to consumer complaints; iv. formulating or providing, or arranging for the formulation or provision of, any advertising or marketing material, including but not limited to, any telephone-sales script, direct-mail solicitation, or the text of any Internet website, email, or other electronic communication or advertisement; v. formulating or providing, or arranging for the formulation or provision of, any marketing support material or service, including but not limited to, web or Internet Protocol addresses or domain name registration for any Internet websites, affiliate-marketing services, or media-placement services; vi. providing names of, or assisting in the generation of, potential customers; vii. performing marketing, billing, or payment services of any kind; and viii. acting or serving as an owner, officer, director, manager, or principal of any entity.

<sup>4</sup> “Victim Compensation Fund Funding” means advancing funds or providing money to any individual who has applied to or is awaiting payment from the Zadroga Fund (a governmentally created victim-compensation fund intended to compensate victims of 9/11) or other governmentally created victim-compensation fund intended to compensate victims of 9/11.

Individual, Defendants hereby agree to reject such payment if they are able, or, if they are not able to reject such payment, Defendants will promptly return the payment to the relevant Affected Individual.

6. Defendants must pay a civil money penalty of \$1.00, which will be paid within 10 days of this Order by wire transfer to the Bureau or to the Bureau's agent in compliance with the Bureau's wiring instructions.
7. All pending motions are hereby denied as moot.
8. Each party agrees to bear its own costs and expenses, including, without limitation, attorneys' fees.
9. This Order is not intended for use by any third party in any other proceeding and is not intended, and should not be construed, as an admission of liability by Defendants.
10. The Court will retain jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

**IT IS SO ORDERED.**

Dated:

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United States District Judge