

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF
NEW HAMPSHIRE, *et al.*,**

Plaintiffs,

STEVE KRAMER, *et al.*,

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

CONSENT JUDGMENT

THIS MATTER comes before the Court upon a stipulation of the Plaintiffs and Defendants Life Corporation and Voice Broadcasting Corporation (collectively “Parties”), requesting that a final decree, as to the Parties and to the matters set forth below, be entered as follows:

1. This action arises under: Section 11(b) of the Voting Rights Act, 52 U.S.C. § 10307(b); the Telephone Consumer Protection Act, 47 U.S.C. § 227(b); and the New Hampshire Election Laws, RSA 664:14-a and 664:14-b.
2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.
3. Venue in this Court is proper.
4. Defendants Life Corporation and Voice Broadcasting Corporation (collectively “Defendants”) acknowledge that the January 21, 2024 robocall orchestrated by former client and Defendant Steve Kramer had the potential to intimidate voters in violation of Section 11(b) of the Voting Rights Act.
5. Defendants shall not intimidate, threaten, or coerce voters in connection with U.S. elections, and further agrees to implement the following compliance plan to ensure that Defendants do not facilitate the transmission of intimidating, threatening, or coercive messages in connection with U.S. elections.

6. In furtherance of the goal of avoiding the initiation of AI-generated and/or falsely spoofed robocalls, Defendants agree to take the following steps:

- a. Defendants will create and staff a dedicated compliance team that will operate during legal dialing hours (7:00 AM to 11:00 PM Central Time), and will be responsible for ensuring compliance with all applicable regulations during these hours.
- b. The compliance team and employees who assist in compliance measures will undergo training to ensure they are able to identify deceptive messages, and understand the dangers of election misinformation to U.S. elections. Training will occur for all new employees, and biannually thereafter for each election and midterm to remain up to date on developments in technology and misinformation related to U.S. elections.
- c. Defendants will require a signed attestation document for each caller identification (“ID”), and maintain a database for each signed attestation for calls made through Defendants’ system.
- d. Defendants will develop and deploy an automated compliance system that verifies caller ID attestations and notifies Defendants’ Quality Control team when a new calling campaign is ready for review, facilitating the process of verifying, grading, and approving or rejecting campaigns based on compliance.
- e. Defendants will build an automated system that performs checks on all scheduled dialing campaigns to ensure that each caller ID is associated with a valid signed attestation. The system will search the database for the caller ID and confirm that

the client ID submitting the attestation matches the client ID using the phone number as the caller ID.

- f. A Quality Control representative will review the calling campaign, verify the caller ID, client ID, and seller ID, and review the recorded message's content on an audio player. The representative will either approve the calling campaign or reject the calling campaign, and all calls will be suspended until any necessary corrections are made.
 - g. If the representative's review of the calling campaign results in a finding that the calling campaign used spoofed numbers or otherwise intimidating, threatening, or coercive calls, Defendants will: (a) void the contract with the client immediately without refund; (b) no longer contract with the client, maintaining a list of all clients that violated relevant regulations; and (c) alert the proper and relevant authorities.
7. Violation of the within Consent Judgment is enforceable under the applicable contempt power of this Court.
 8. This Court shall retain jurisdiction over the subject matter and Parties to construe, enforce, and implement this Consent Judgment, upon application of any of the Parties. All notices in connection with this Consent Judgment shall be deemed sufficient to each of the Parties when served by certified mail, return receipt requested, by overnight courier, or by facsimile, at the addresses indicated below or at such other place a party may indicate in writing to the other party.
 9. The Parties waive their right to an appeal or otherwise contest this Consent Judgment.

10. This Consent Judgment is final as to the Parties. Each of the Parties shall bear its own fees and costs.

IT IS SO ORDERED AND DECREED on this ____ day of _____.

Honorable Steven J. McAuliffe

CONSENTED TO:

PLAINTIFFS LEAGUE OF WOMEN VOTERS OF NEW HAMPSHIRE, LEAGUE OF WOMEN VOTERS OF THE UNITED STATES, NANCY MARASHIO, JAMES FIESEHER, AND PATRICIA GINGRICH	DEFENDANTS LIFE CORPORATION AND VOICE BROADCASTING CORPORATION.
Date: May 9, 2025 <u>/s/ Mark R. Herring</u> Mark R. Herring* (DC Bar #90013124) Matthew R. Nicely* (DC Bar #430564) Caroline L. Wolverton* (DC Bar #496433) Amanda S. McGinn* (DC Bar #1049085) Joseph T. DiPiero* (DC Bar #1618536) Maria Julia Hershey* (DC Bar #90020162) Sara M. Hanna* (DC Bar #90017864) Akin Gump Strauss Hauer & Feld Robert S. Strauss Tower 2001 K Street, N.W. Washington, DC 20006-1037 (202) 887-4000 mherring@akingump.com Courtney Hostetler* (MA Bar #683307) John Bonifaz* (MA Bar #562478) Ben Clements* (MA Bar #555802) Amira Mattar* (NY Bar #5774450)	Date: May 9, 2025 <u>/s/ Benjamin T. King</u> Benjamin T. King (NH Bar #12888) Douglas, Leonard & Garvey, P.C. 14 South Street, Suite 5 Concord, NH 03301 (603) 224-1988 Fax: (603) 229-1988 benjamin@nhlawoffice.com Ezra D. Church* (PA Bar #206072) Terese Schireson* (PA Bar #320999) Morgan, Lewis & Bockius LLP 2222 Market Street Philadelphia, PA 19103-3007 (215) 963-5000 Fax: (215) 3963-5001 ezra.church@morganlewis.com terese.schireson@morganlewis.com <i>Counsel for Defendants Life Corporation and Voice Broadcasting Corporation</i> <i>*Admitted pro hac vice</i>

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this date upon all counsel of record via the ECF filing system.

/s/ Benjamin T. King
Benjamin T. King