

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
_____ DIVISION

STATE OF ARKANSAS *ex rel.*
LESLIE RUTLEDGE, ATTORNEY GENERAL

PLAINTIFF

vs. Case No: _____

THE RESORT PLACE, LLC
d/b/a RESORT PLACE TRAVEL and
d/b/a C4SUCCESS;
JAY ALLEN EDMONSON; and
DORA ANN EDMONSON

DEFENDANTS

COMPLAINT

COMES NOW, the State of Arkansas *ex rel.* Leslie Rutledge, Attorney General (“the State”), and for its Complaint against The Resort Place, LLC d/b/a Resort Place Travel and d/b/a C4Success, Jay Allen Edmonson, and Dora Ann Edmonson (“the Defendants”), states:

I. INTRODUCTION

1. This is a consumer-protection action brought to redress and restrain violations of the Arkansas Deceptive Trade Practices Act, Ark. Code Ann. § 4-88-101, *et seq.*

2. Defendants have advertised travel and vacation vouchers and received money from consumers for the purchase of travel and vacation vouchers, but failed

to fulfill their promises to secure lodgings for the consumers' vacations causing consumers to pay out-of-pocket for lodgings at their destination.

3. The State seeks an injunction, an order of restitution, and the imposition of civil penalties against the Defendants for violations of the Arkansas Deceptive Trade Practices Act.

II. PARTIES

4. Plaintiff in this action is the State of Arkansas *ex rel.* Leslie Rutledge, Attorney General of Arkansas. Attorney General Rutledge is the chief legal officer of the State of Arkansas. Pursuant to Ark. Code Ann. § 4-88-104, the State may seek civil enforcement of the Arkansas Deceptive Trade Practices Act ("ADTPA").

5. Defendant The Resort Place, LLC ("The Resort Place") is an Arkansas for-profit limited liability company whose principal place of business is in Barling, Arkansas. The Resort Place conducts business under the fictitious names of Resort Place Travel and C4Success. Its registered agent for service of process in Arkansas is Jay Edmonson, 409 Chateau Street, Barling, Arkansas 72923.

6. Defendant Jay Allen Edmondson is an owner and operator of The Resort Place. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Jay Allen Edmondson has formulated, directed, controlled, and participated in the business of The Resort Place to such a degree that, pursuant to Ark. Code Ann. § 4-88-113(d), he is personally liable for the deceptive, unconscionable, and otherwise unlawful acts and practices of The Resort Place, as described below. Jay Allen Edmondson has "control[led]" The Resort Place as that

term is used in Ark. Code Ann. § 4-88-113(d). He is also personally liable for his own acts, omissions, and practices as owner and operator of The Resort Place.

7. Defendant Dora Ann Edmondson is an owner and operator of the Resort Place. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Dora Ann Edmondson has formulated, directed, controlled, and participated in the business of The Resort Place to such a degree that, pursuant to Ark. Code Ann. § 4-88-113(d), she is personally liable for the deceptive, unconscionable, and otherwise unlawful acts and practices of The Resort Place, as described below. Dora Ann Edmondson has “control[led]” The Resort Place as that term is used in Ark. Code Ann. § 4-88-113(d). She is also personally liable for her own acts, omissions, and practices as owner and operator of The Resort Place.

III. JURISDICTION

8. This Court has jurisdiction over this matter pursuant to Ark. Code Ann. § 4-88-104 and the common law of the State of Arkansas.

9. Venue is proper pursuant to Ark. Code Ann. § 4-88-104, Ark. Code Ann. § 4-88-112, Ark. Code Ann. § 16-60-104, and the common law of the State of Arkansas.

10. Defendant is a travel agency which has transacted business in the State of Arkansas. The Court also has jurisdiction over the claims and the Defendant in this action pursuant to Ark. Code Ann. § 16-4-101, which extends personal jurisdiction to all persons, causes of action, and claims for relief, to the maximum extent permitted by the Due Process of Law Clause of the Fourteenth

Amendment of the United States Constitution. The Defendants have availed themselves of the benefits of conducting business in the State of Arkansas by advertising services, operating their business headquarters, and taking money from Arkansas consumers for its services within the State of Arkansas.

IV. FACTUAL ALLEGATIONS

11. Defendant The Resort Place is a privately-owned, for-profit limited liability company that has its business headquarters in Barling, Arkansas.

12. Defendants have two websites registered in connection with their business, www.theresortplace.com and www.resortplacetravel.com.

13. The first website, www.theresortplace.com,¹ targets prospective “clients” or vacation-property owners and claims to assist them by designing contracts through a “collaborative process” that “yield[s] high rewards only when predetermined objectives are achieved.”² It offers consulting services and touts Defendant Dora Edmondson as “well known in the vacation ownership industry for her expertise in resort operations, points based [*sic*] clubs, and inventory management.”³ The website offers “clients” the following services: inventory management, vacation club design and evaluation, owner servicing assistance and evaluation, owner referral program design and servicing, benefit programs, online

¹ See Exhibit A.

² *Id.*, p. 3.

³ *Id.*

training, information technology evaluation and support, and website design and maintenance.⁴

14. The second website, www.resortplacetravel.com,⁵ is directed to vacation-rental consumers and advertises vacation packages and vouchers. The website offers a number of destinations including: Branson, Missouri; Las Vegas, Nevada; Puerto Vallarta, Mexico; Williamsburg, Virginia; Gatlinburg and Pigeon Forge Cabins in Tennessee; and the Dominican Republic.⁶ It offers “Featured Resorts” in Fort Walton Beach, Florida, Indian Shores, Florida, Honolulu, Hawaii, Kissimmee, Florida, Marco Island, Florida, St. Petersburg, Florida, Treasure Island, Florida, Myrtle Beach, South Carolina, Pine Mountain, Georgia, South Padre Island, Texas, and Gatlinburg, Tennessee.⁷

15. Resort Place Travel’s website offers consumers a “Three Vacation Package,” allowing the consumer to choose three destinations for only \$1499.⁸ The program advertises the following:

Purchase three vacation vouchers. Each voucher is for one week’s vacation. Reservations must be for travel ending by December 31, 2017. There are no black out [sic] dates. These vouchers can be transferred to friends or family members. All reservations will be based upon availability at the time of booking. Some locations have very limited availability during some seasons. The vouchers cannot be

⁴ *Id.*, p. 1.

⁵ *See* Exhibit B.

⁶ *Id.*, pp. 3-6.

⁷ *Id.*, pp. 7-8.

⁸ *Id.*, p. 13.

combined with other offers or be used in conjunction with any previously booked reservation.⁹

The offer has some restrictions, including:

- Cannot be combined with other offers or be used in conjunction with any previously booked reservation.
- Vouchers are valid for accommodations only.
- Vacations are for 7 nights. Check in day will vary by resort. Shorter stays may be available on request.
- Reservations will be based on availability in the Resort Place Travel system.
- Age restrictions may apply.
- Security Deposits, incidentals and certain resort or occupancy fees are required to be paid by the guest at the time of check in.¹⁰

16. Resort Place Travel's website facilitates communication between consumers and Defendants with an online form to request quotes or information about special packages.¹¹

17. Defendants also advertise their so-called "vacation vouchers" and packages on Facebook.¹²

18. According to consumer reports, Defendants also advertise vacations via direct email solicitation.

19. The Office of the Attorney General's Consumer Protection Division has received over 75 complaints from consumers regarding Defendants' business

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*, pp. 3, 7, 9, 11, 13, and 14.

¹² *See* Exhibit C.

practices. Additional complaints have been filed with the Better Business Bureau and the Federal Trade Commission.

20. Consumers describe paying Defendants for vacation bookings, but then learning upon arrival, that the reservation placed through Defendants was never booked. Some consumers describe being moved from the resort that was promised, to a hotel room with none of the amenities that were included in their original reservation. Other consumers describe having to pay for substitute accommodations out-of-pocket—in many cases offering fewer amenities than promised by Defendants—even though payment had been previously made to Defendants.

21. One consumer describes purchasing a “membership” that Defendants offered for \$899.00 and then learning of a second debit to his account in the amount of \$999.00. While Defendants admitted that the second debit was a mistake, they never refunded the money to the consumer. This same consumer describes a vacation to Treasure Island, booked and paid for through Defendants, where he was informed five days into his stay that the resort had locked him out of his room due to nonpayment. The credit card on file from Defendants had insufficient funds. The resort demanded that the consumer pay out-of-pocket for the five night stay and the consumer thus paid \$2,815.45 out-of-pocket for the accommodations. At the time, Defendants promised the consumer that he would be reimbursed for that out-of-pocket expense, but they never fulfilled the promise. While Defendants made an attempt to pay some of the costs back, the transactions had insufficient funds and were never completed.

22. Another consumer describes a vacation to a resort in Panama City Beach, Florida booked through Defendants. Because Defendants failed to make the promised reservations, however, the consumer and her family were moved to a hotel for the first night of the vacation and then to a different hotel for the second night of the vacation. Neither of these accommodations included the amenities promised during the original booking, such as a kitchen. Despite Defendants' failure to fulfill the promise to reserve and complete payment on the consumer's behalf, they continued to promise during the first two days of the vacation that such efforts were underway. The consumer and her family eventually had to move to a third hotel that was located five miles from the beach and pay out-of-pocket for all of the trip's accommodations, which amounted to approximately \$2300, even though the consumer had already paid Defendants for the accommodations in full.

23. Another consumer purchased the "Three Vacation Package" advertised on Resort Place Travel's website. While the first of the three vacations was taken without incident, the second vacation's booking was problematic. Defendants contacted the consumer and informed her that they were unable to pay for the second vacation's reservation. Instead, Defendants offered to reimburse the consumer for the cost of the accommodations if the consumer wanted to move forward with the vacation. The consumer booked and paid for accommodations in the amount of \$1,586.25. As with other consumers, Defendants never fulfilled their promise to reimburse consumer for the out-of-pocket costs, even though the consumer had already paid for three vacations in full.

24. Another consumer reports traveling ten hours by car with an infant and a toddler to vacation in Florida at a resort which was booked and paid for through Defendants. Upon arrival, the consumer was informed that Defendants had not paid for the accommodations. The consumer contacted Defendants and was instructed to pay for the accommodations out-of-pocket in an amount over \$5,000.00. Defendants promised to reimburse the consumer and even though they attempted to pay the consumer a number of times, each payment bounced. The consumer has still not received the promised refund or reimbursement. Many consumers report nearly identical occurrences.

25. One consumer reports that he paid for a three-vacation package and booked the first trip to Myrtle Beach, Florida for June of 2016. One week before the trip, he was informed by email from Defendants that they were unable to fund the trip. The consumer has requested a refund, but has not received one.

26. Another consumer describes the purchase of a four-vacation package. His credit card was then charged to a hotel in Hawaii even though none of his travel destinations were to Hawaii. He disputed the charges to his credit card.

27. Many consumers report that they purchased the “Three Vacation Package” and are unable to make contact with Defendants in order to book the trips they purchased. Consumers report that both phone calls and emails go unanswered.

V. VIOLATIONS OF LAW

28. The Arkansas Deceptive Trade Practices Act (“DTPA”) sets forth the State’s statutory program prohibiting deceptive and unconscionable trade practices.¹³

29. The business practices of Defendants constitute the sale of “goods” or “services.”¹⁴ The same business practices constitute business, commerce, or trade.¹⁵

30. It is unlawful to “knowingly make a false representation as to the characteristics, ingredients, uses, benefits, alterations, source, approval, or certification of goods or services...”¹⁶ Defendants have engaged in prohibited conduct by misrepresenting:

- a. The availability of vacation bookings;
- b. The cost of vacation bookings;
- c. The amenities offered through Defendants’ vacation packages;
- d. Reservation confirmations;
- e. Payment completion; and
- f. Refund or reimbursement assurances.

¹³ Ark. Code Ann. §§ 4-88-101, *et seq.*

¹⁴ Ark. Code Ann. § 4-88-102(4) and (7).

¹⁵ Ark. Code Ann. § 4-88-107.

¹⁶ Ark. Code Ann. § 4-88-107(a)(1).

31. It is a violation to engage in unconscionable, false, or deceptive acts or practices in business, commerce, or trade.¹⁷ Defendants have engaged in prohibited conduct by:

- a. Promising to book or reserve accommodations for customers at certain resorts, vacation spots, or with certain amenities, and failing to provide the service;
- b. Collecting money from consumers for advertised services and failing to use the funds as promised;
- c. Continuing to market their services even though they were unable to provide the advertised services;
- d. Continuing to accept customers, bookings, and reservations even though they had no present ability to pay for the services the consumers purchased;
- e. When consumers were stranded at a vacation destination without the promised reservation, promising that out-of-pocket expenses for accommodations would be reimbursed and failing to reimburse the consumers;
- f. Completing unauthorized credit card transactions for purchases that did not pertain to the credit card owner's travel plans; and

¹⁷ Ark. Code Ann. § 4-88-107(a)(10).

- g. Withdrawing funds from customers' credit cards in order to pay for other customers' vacation purchases when not authorized to do so.

VI. PRAYER FOR RELIEF

32. The Attorney General may bring a civil action to seek to prevent persons from engaging in the use or employment of prohibited practices.¹⁸

33. Likewise, the Attorney General may bring a civil action to seek to restore to any purchaser who has suffered any ascertainable loss by reason of the use or employment of the prohibited practices any moneys or real or personal property which may have been acquired by means of any practices declared to be unlawful, together with other damages sustained.¹⁹

34. The Attorney General may seek an injunction prohibiting any person from engaging in any deceptive or unlawful practice.²⁰

35. Any person who violates the provisions of the DTPA may be assessed a civil penalty of up to \$10,000 per violation.²¹

36. In addition, any person who violates the provisions of the Arkansas Deceptive Trade Practices Act shall be liable to the Office of the Attorney General for all costs and fees, including but not limited to, expert witness fees and attorney's

¹⁸ Ark. Code Ann. § 4-88-113(a)(1).

¹⁹ Ark. Code Ann. § 4-88-113(a)(2)(A).

²⁰ Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1).

²¹ Ark. Code Ann. § 4-88-113(a)(3).

fees, incurred by the Office of the Attorney General in the prosecution of such actions.²²

37. A “person” is an individual, organization, group, association, partnership, corporation, or any combination thereof.²³

38. Defendants are each a “person” who has engaged in an unconscionable, false, or deceptive act or practice in business, commerce, or trade.

39. Defendant Jay Allen Edmondson has formulated, directed, controlled, and participated in the business of The Resort Place to such a degree that, pursuant to Ark. Code Ann. § 4-88-113(d), he is personally liable for the deceptive, unconscionable, and otherwise unlawful acts and practices of The Resort Place. Jay Allen Edmondson has “control[led]” The Resort Place as that term is used in Ark. Code Ann. § 4-88-113(d). He is also personally liable for his own acts, omissions, and practices as owner and operator of The Resort Place.

40. Defendant Dora Ann Edmondson has formulated, directed, controlled, and participated in the business of The Resort Place to such a degree that, pursuant to Ark. Code Ann. § 4-88-113(d), she is personally liable for the deceptive, unconscionable, and otherwise unlawful acts and practices of The Resort Place. Dora Ann Edmondson has “control[led]” The Resort Place as that term is used in

²² Ark. Code Ann. § 4-88-113(e).

²³ Ark. Code Ann. § 4-88-102(5).

Ark. Code Ann. § 4-88-113(d). She is also personally liable for her own acts, omissions, and practices as owner and operator of The Resort Place.

41. The State will exercise its right to a trial by jury.

WHEREFORE, the above premises considered, the State of Arkansas *ex rel.* Leslie Rutledge, Attorney General, respectfully requests that this Honorable Court:

(A) Issue such orders, pursuant Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1), as may be necessary to prevent the use or employment by the Defendant of the practices described herein which are violations of the Arkansas Deceptive Trade Practices Act;

(B) Issue an order, pursuant to Ark. Code Ann. § 4-88-113(a)(2)(A), requiring Defendants to pay consumer restitution to those Arkansas consumers affected by the activities outlined herein; in addition, or in the alternative, enter an order requiring Defendants to remit to affected consumers all sums obtained from Arkansas consumers by methods prohibited by Arkansas law;

(C) Issue an order requiring Defendants to comply with requests from those consumers who wish to cancel their service, to discontinue any further efforts to collect money from those consumers, withdraw any consumer accounts that have been referred to a collection agency, and remove any negative credit information from the consumers' credit record.

(D) Impose civil penalties pursuant to Ark. Code Ann. § 4-88-113(b), to be paid to the State by the Defendants in the amount of \$10,000.00 per each violation of the Arkansas Deceptive Trade Practices Act proved at a trial of this matter, the

full amount of which will exceed the amount necessary to establish federal diversity jurisdiction.

(E) Issue an order, pursuant to Ark. Code Ann. § 4-88-113(e), requiring Defendants to pay the State's costs in this investigation and litigation, including, but not limited to, attorneys' fees and costs; and

(F) For all other just and proper relief to which the State may be entitled.

Respectfully Submitted,

LESLIE RUTLEDGE
Attorney General

By:



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The services provided by The Resort Place have the goal of assisting developers to be committed to providing quality vacation experiences that owners and guests expect from exceptional resort communities, thereby ensuring their future profitability.



Inventory Management

Inventory management is critical to the financial health of a developer or vacation ownership association or club. The management is a complex mixture of knowledge and understanding of bulk banking concepts, occupancy and reservation forecasting, usage statistics, etc. A successful inventory management process requires future planning, anticipates the trends and responses, and is proactive in approach. The Resort Place develops proactive, effective programs and trains inventory managers to maintain excellence in the resulting inventory and yield management.

Vacation Clubs Design and Evaluation

Through a thorough understanding of the timeshare owners needs and behaviors, The Resort Place designs and implements vacation clubs that are easy to sell and

operate, satisfies the vacation needs of your owners for a lifetime, and improves the overall profitability of the organization.

Owner Servicing Assistance and Evaluation

The Resort Place evaluates and trains your staff to be the best possible servicing arm to support the continued sales and profitability of the organization. We develop and implement programs that rejuvenate the owner base and "take back your owners" to maximize the vacation experience and resultant business.

Owner Referral Program Design and Servicing

One of the greatest lead assets a resort developer has is the owners' referrals. An effective program offsets the rising cost of marketing by turning the owners into marketing partners. Programs are designed by The Resort Place to maximize the efficiency of utilizing this untapped resource.

Benefit Programs

Your members and employees are your most valuable resource. Allow us to provide your team with the tools to retain them through a variety of benefits, such as...

- **Special Discounts** – Discounts on merchandise, vacations, and photo albums, just to name a few.
- **Lifestyle Benefits** – Free Pharmacy Card, identity theft protection, and other optional benefits that can be used everyday



Online Training

Turnkey Training for Resort Employees! – Imagine being able to consistently provide high-quality, effective training for your staff and place some of the best practices and most useful knowledge of the industry at their fingertips. Now you can!

Information Technology Evaluation and Support

The use of information technology only improves situations if the systems are the correct ones for your business. The Resort Place evaluates the gaps in your systems and processes to ensure our clients have the systems that maximize the utilization of all resources. We can also provide the leadership and governance, on an interim basis, necessary to move your business into the this century.

Website Design and Maintenance

The Resort Place provides the support for website design based around the needs of the business and owners. Depending on the client's needs, the website can be simplistic or complex. Our designers ensure that the business is supported not hindered by the website.

Sign up for vacation specials

Email Address*

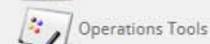
First Name

Last Name

* = required field

powered by MailChimp!

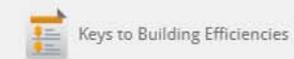
Consulting



Services



Sales and Marketing



About Us



Working with The Resort Place can be a new experience. We prefer to "share the risk" with our clients. This means we get involved day-to-day, working side-by-side with client personnel to implement real, meaningful change. We use a collaborative process with our clients to design contracts that yield high rewards only when predetermined objectives are achieved. Our consultants use their expertise to maximize our client's effectiveness and profitability. The primary consultants that make up the team are listed below.



Dora Edmonson

Dora is well known in the vacation ownership industry for her expertise in resort operations, points based clubs, and inventory management. Among the resort companies she has helped in this capacity are Bluegreen, Fairfield Communities, InnSeason Resorts, Sunterra, Royal Resorts, and Westgate as well as RCI, Interval International and ICE.

Clients

Our current and former clients are significant within the Vacation Ownership Industry. Some of clients, current and former, include...

- Breckenridge Grand Vacations
- InnSeason Resorts
- Regency Vacation Company
- Silverleaf Resorts
- Sol Melia Vacation Club
- The Innsbruck
- The Royal Resorts
- Thousand Trails
- Welk Resort Group
- Morgan RV Resorts

Sign up for vacation specials

Email Address*

First Name

Last Name

* = required field

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Consulting



Operations Consulting



Operations Tools



Technology Consulting



Technology Tools

Services



Communication



Fulfillment Services



Resort Website



Resort Training

Sales and Marketing



Keys to Building Efficiencies

Contact Us

The Resort Place
P.O. Box 23190
Barling, AR 72923
Phone: (479) 668-0786

Email: customercare@theresortplace.com

Name

Email

phone

Comments

Send!

Sign up for vacation specials

Email Address*

First Name

Last Name

* = required field

Subscribe

powered by MailChimp!

Consulting

 Operations Consulting

 Operations Tools

 Technology Consulting

 Technology Tools

Services

 Communication

 Fulfillment Services

 Resort Website

 Resort Training

Sales and Marketing

 Keys to Building Efficiencies

The screenshot shows the website <http://resortplacetravel.com/> with a navigation menu including Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. The main content area features three promotional banners:

- Orlando Condo Vacation Week for less than \$80 per night** with a [Click Here for Details](#) link.
- Fun in the Sun! Beach Vacation Weeks for less than \$100 per night** with a [Click Here for Details](#) link.
- River cruising is exciting** with a paragraph: "River cruising is an exciting option for frequent cruisers who have sailed the Mediterranean and want to experience Europe in another way. Traversing the major waterways of Europe including Rhine, and Danube, river cruising is a more leisurely way to sail, enabling passengers to experience the majestic scenery and smaller towns and villages en route from port to port versus open water sailing." and a [Get more information](#) button.

The screenshot shows a web browser window with the URL <http://resortplacetravel.com/>. The website header includes the logo for "Resort Place Travel" and a navigation menu with the following items: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, Special Deal, and Contact. Below the navigation is a search icon.

The main content area features a promotional banner for Las Vegas. At the top of the banner, it says "To plan your next vacation, call us at 479-668-0786". The banner image shows a night view of a Las Vegas casino building with a fountain in the foreground. Overlaid on the image is the following text:

Las Vegas
Casinos, naturally, continue to draw tourists to Las Vegas. From penny slots to high stakes table games in private salons, you'll find it here. But there's much more to Las Vegas than gambling. Las Vegas has many attractions of a different sort, from the choreographed fountains at the Bellagio to the Liberace Museum. Las Vegas is also surprisingly family-friendly.

Below the text is a button that says "Get more information".

At the bottom of the page, there is a copyright notice: © 2017 Resort Place Travel.

The screenshot shows a web browser window with the URL <http://resortplacetravel.com/category/destinations/>. The website header includes the logo for "Resort Place Travel" and a navigation menu with items: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. The main content area features a large image of a city at night with a fountain and boats. Below this is the heading "Branson, Missouri" and a paragraph of text: "Don't let the small-town, rural surroundings fool you: there's a side of Branson that evokes Las Vegas without the casinos. Entertainment is nonstop on The Strip, a seven-mile stretch of live music and comedy shows, numerous restaurants, theme parks...". A second image shows a large, illuminated building at night. On the right side, there is a sidebar with the heading "Request a Vacation Quote" and a form titled "Get Vacation Specials". The form includes fields for "Email Address*", "First Name", and "Last Name", a note "* = required field", and a "Preferred Format" section with radio buttons for "HTML" (selected) and "Text". A "Subscribe" button is at the bottom of the form, with the text "powered by MailChimp!" below it. The sidebar also contains links for "Cruise Tips", "FAQ", and "New Deals".

The screenshot shows a web browser window with the URL <http://resortplacetravel.com/category/destinations/>. The website header includes the logo for "Resort Place Travel" and a navigation menu with the following items: Destinations (with a dropdown arrow), Featured Resorts, Condo Vacations, Online Booking (with a dropdown arrow), Resources, and Special Deal. Below the navigation is a "Contact" link. The main content area features two destination cards. The first card is for "Las Vegas", with a sub-header and a paragraph of text: "Casinos, naturally, continue to draw tourists to Las Vegas. From penny slots to high stakes table games in private salons, you'll find it here. But there's much more to Las Vegas than gambling. Our weekend itinerary highlights attractions of a different...". Below the text is a wide, horizontal image of a tropical beach with palm trees and turquoise water. The second card is for "Puerto Vallarta", with a sub-header and a paragraph of text: "Puerto Vallarta, on the Mexican Riviera, isn't a one-caballo town. True, gold-sand beaches and indigo waters invite carefree bay-side relaxation. But the lush Sierra Madres beckon you on horse, mountain bike or foot and you can stroll the malecón (esplanade)...". Below the text is a wide, horizontal image of a coastal town with green trees and a building.

<http://resortplacetravel.com/category/destinations/>

Destinations | Resort Place ...

Resort Place Travel

Destinations ▾ Featured Resorts Condo Vacations Online Booking ▾ Resources Special Deal

Contact

Las Vegas

Casinos, naturally, continue to draw tourists to Las Vegas. From penny slots to high stakes table games in private salons, you'll find it here. But there's much more to Las Vegas than gambling. Our weekend itinerary highlights attractions of a different...



Puerto Vallarta

Puerto Vallarta, on the Mexican Riviera, isn't a one-caballo town. True, gold-sand beaches and indigo waters invite carefree bay-side relaxation. But the lush Sierra Madres beckon you on horse, mountain bike or foot and you can stroll the malecón (esplanade)...



The screenshot shows a web browser window with the URL <http://resortplacetravel.com/category/destinations/>. The page features the "Resort Place Travel" logo and a navigation menu with items: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. Below the navigation, there is a search icon and a list of destination cards. The first card is for "Puerto Vallarta", followed by "Williamsburg, Virginia", and "Gatlinburg and Pigeon Forge Cabins". Each card includes a brief description and a representative image. The "Williamsburg, Virginia" card features a large image of a historic building complex. The "Gatlinburg and Pigeon Forge Cabins" card features a partial image of a wooden cabin structure.

Puerto Vallarta
Puerto Vallarta, on the Mexican Riviera, isn't a one-caballo town. True, gold-sand beaches and indigo waters invite carefree bay-side relaxation. But the lush Sierra Madres beckon you on horse, mountain bike or foot and you can stroll the malecón (esplanade)...

Williamsburg, Virginia
While history buffs from around the world have long made Williamsburg, with its many venerable sites, a hot spot, the city boasts a range of attractions for visitors of all ages and interests. Relive the past at Colonial Williamsburg, the largest outdoor living...

Gatlinburg and Pigeon Forge Cabins
Why stay in a hotel when you can stay in a cabin? Call us at 888-276-9833 or click Get Quote below for our best prices on Gatlinburg and Pigeon...

The screenshot shows a web browser window with the URL <http://resortplacetravel.com/category/destinations/>. The website header includes the logo for "Resort Place Travel" and a navigation menu with items: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. Below the header, there is a search icon and a paragraph of text about Williamsburg: "While history buffs from around the world have long made Williamsburg, with its many venerable sites, a hot spot, the city boasts a range of attractions for visitors of all ages and interests. Relive the past at Colonial Williamsburg, the largest outdoor living...".

Gatlinburg and Pigeon Forge Cabins

Why stay in a hotel when you can stay in a cabin? Call us at 888-276-9833 or click Get Quote below for our best prices on Gatlinburg and Pigeon...



Dominican Republic

The Dominican Republic lies in the same waters as Cuba and Puerto Rico, taking up the eastern two-thirds of the island it shares with Haiti. Offering a lush interior with a mix of caves, Victorian gingerbread houses and the lore of pirates, plus 900 miles of coastline...

[« Older Entries](#)

© 2017 Resort Place Travel

The screenshot shows the 'Featured Resorts' page on the Resort Place Travel website. The page includes a navigation menu with links for Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. The main content area features a table of featured resorts and a sidebar with a 'Request a Vacation Quote' form and a 'Get Vacation Specials' subscription form.

City	Resort	Website
Fort Walton Beach, FL	Marina Bay Resort	http://resortplacetravel.com/condo-vacations/marina-bay-at-fort-walton-beach-fl/
Fort Walton Beach, FL	Sandy Pointe at Destin West	http://resortplacetravel.com/condo-vacations/sandy-pointe-at-destin-west/
Fort Walton Beach, FL	Steamboat Landing	http://resortplacetravel.com/condo-vacations/steamboat-landing/
Indian Shores, FL	Beach Palms	http://resortplacetravel.com/condo-vacations/beach-palms/
Honolulu, HI	Iliaki Hotel and Luxury Suites	http://resortplacetravel.com/condo-vacations/iliaki-hotel-and-luxury-suites/
Kissimmee, FL	Lago Vista at Buenaventura Lakes	http://resortplacetravel.com/condo-vacations/lago-vista-at-buenaventura-lakes/
Marco Island, Florida	The Boat House	http://resortplacetravel.com/condo-vacations/the-boat-house/
Marco Island, FL	The Pavilion	http://resortplacetravel.com/condo-vacations/the-pavilion/

Request a Vacation Quote

Travel Tips Home

FAQ Destinations
Cruise

Get Vacation Specials

Email Address*

First Name

Last Name

* = required field

Preferred Format

HTML
 Text

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Exhibit B

The screenshot shows a web browser window with the URL <http://resortplacetravel.com/condo-vacations/featured-resorts/>. The website header includes the logo for Resort Place Travel and navigation links: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. A contact link is also visible.

Kissimmee, FL	Lago Vista at Buenaventura Lakes	http://resortplacetravel.com/condo-vacations/lago-vista-at-buenaventura-lakes/
Marco Island, Florida	The Boat House	http://resortplacetravel.com/condo-vacations/the-boat-house/
Marco Island, FL	The Pavilion	http://resortplacetravel.com/condo-vacations/the-pavilion/
St. Petersburg, Florida	Isla Del Sol	http://resortplacetravel.com/condo-vacations/isla-del-sol/
Treasure Island, Florida	Land's End at Sunset Beach	http://resortplacetravel.com/condo-vacations/lands-end-at-sunset-beach/
Treasure Island, Florida	Treasure Shores	http://resortplacetravel.com/condo-vacations/treasure-shores-resort/
Myrtle Beach, SC	Sands Ocean Club	http://resortplacetravel.com/condo-vacations/sands-ocean-club/
Pine Mountain, GA	Callaway Gardens	http://resortplacetravel.com/condo-vacations/callaway-gardens/
South Padre Island, TX	Bahia Mar	http://resortplacetravel.com/condo-vacations/bahia-mar/
Gatlinburg, TN	Ski View Mountain Resort	http://resortplacetravel.com/condo-vacations/ski-view-mountain/

Not all of these resorts have availability through the year. Contact us for vacation options.

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The screenshot shows a web browser window with the URL <http://resortplacetravel.com/category/resources/>. The website header includes a navigation menu with links for Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. The main content area features a large image of a beach with lounge chairs and palm trees. Below the image is an announcement titled "Announcement: Travel Tips" with a list of links for travel information. To the right is a "Request a Vacation Quote" form with fields for email, first name, and last name, and a "Subscribe" button. The form also includes a "Preferred Format" section with radio buttons for HTML and Text.

Resort Place Travel
Destinations Featured Resorts Condo Vacations Online Booking Resources Special Deal

Request a Vacation Quote

Destinations
Cruise
Travel Tips
Brunch
FAQ

Get Vacation Specials

Email Address*
First Name
Last Name

* = required field

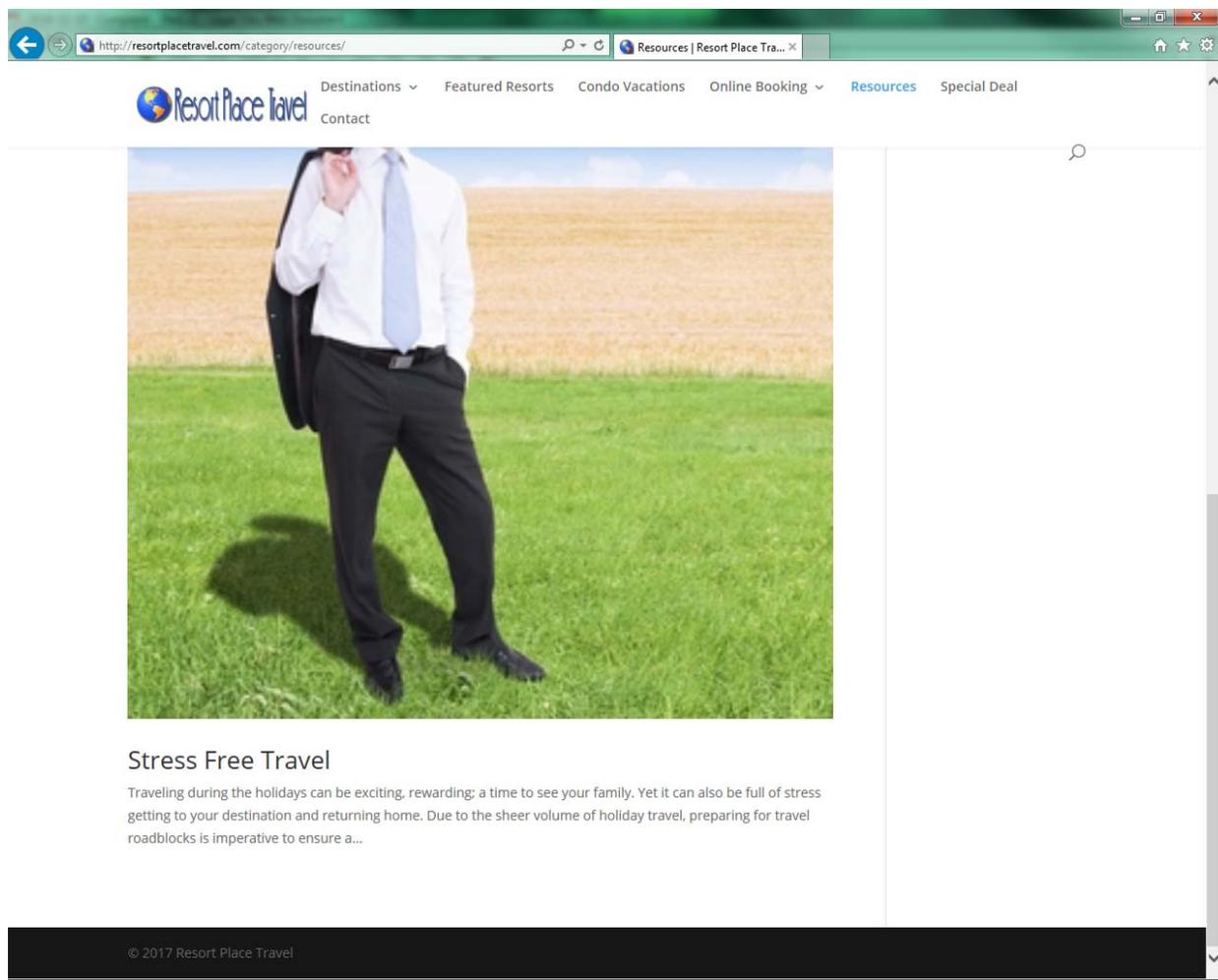
Preferred Format
 HTML
 Text

Subscribe

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Announcement: Travel Tips

The following links have useful information for the traveler. [Tips for Travelers and Consumers – US Department of Homeland Security](#), [Transportation Security Administration Passport Information – The United States Department of State](#) [VISA ATM Locator](#) [MasterCard ATM...](#)



http://resortplacetravel.com/category/resources/ Resources | Resort Place Tra... x

Resort Place Travel Destinations Featured Resorts Condo Vacations Online Booking Resources Special Deal Contact



Stress Free Travel

Traveling during the holidays can be exciting, rewarding; a time to see your family. Yet it can also be full of stress getting to your destination and returning home. Due to the sheer volume of holiday travel, preparing for travel roadblocks is imperative to ensure a...

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The screenshot shows a web browser window with the URL <http://resortplacetravel.com/travel-tips/>. The website header includes the logo for "Resort Place Travel" and a navigation menu with items: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, and Special Deal. Below the navigation is a "Contact" link. The main content area features a large image of a tropical beach with lounge chairs and palm trees. Below the image is the section title "Travel Tips" and a list of links: "Tips for Travelers and Consumers - US Department of Homeland Security, Transportation Security Administration", "Passport Information - The United States Department of State", "VISA ATM Locator", "MasterCard ATM locator", and "Packing Tips - OneBag.com". On the right side of the page, there is a sidebar with a search icon, a list of links (Travel Insurance, Destinations, Travel Tips, FAQ, Whale Watching, Cruise), and a "Get Vacation Specials" form. The form includes fields for "Email Address*", "First Name", and "Last Name", a note that "*" = required field, and a "Preferred Format" section with radio buttons for "HTML" (selected) and "Text". A "Subscribe" button is at the bottom of the form, with the text "powered by MailChimp!" below it.

http://resortplacetravel.com/stress-free-travel-2/ Stress Free Travel | Resort Pl...
Destinations ▾ Featured Resorts Condo Vacations Online Booking ▾ Resources Special Deal
Contact

Resort Place Travel

Subscribe
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Traveling during the holidays can be exciting, rewarding; a time to see your family. Yet it can also be full of stress getting to your destination and returning home. Due to the sheer volume of holiday travel, preparing for travel roadblocks is imperative to ensure a stress-free vacation from beginning to end. Below are 5 tips for a smoother journey!

- 1. Passports** – If a passport is needed, make sure it is not going to expire within 3 months. Some airlines will actually suspend your flight even though your passport has not expired, but is close to expiring. So double check the expiry date of your passport and check with your travel agent!
- 2. Use carry-on luggage** – Getting everything into a carry-on bag will not only save you from paying checked baggage fees, but also frees you up with dealing with the extra baggage. Plus, you are more able to handle the surprises that often come with holiday travel. If you need to change your flight, or decide to fly standby on an earlier departure, you'll have everything with you when you arrive at your destination. If you are bringing back gifts on your return flight, you may want to purchase inexpensive luggage at your destination, or bring along another duffel bag that you can use in case you're bringing home more than you anticipated!
- 3. Ship gifts** – If you are traveling with "gifts" in tow, it may be best to ship them ahead of time. This will reduce the chance of breakage, lost gifts, and just simply weighing you down.
- 4. Take an early morning flight** – Not only do the first flights of the day typically have better on-time departure statistics, they can help you avoid weather-related delays. Aircrafts departing early in the morning are more likely to be at the gate, de-iced and ready to go. And in the case that bad weather does cancel your flight, you'll have more options for rebooking throughout the remainder of the day.
- 5. Arrive early** – It should be expected that the volume of travelers will be increased at this time. Allow yourself ample time to get checked in, go through security and get to your gate. It is recommended to arrive at the airport at least two hours early for domestic flights and three hours early for international flights.

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Three Vacation Package

Pick three vacations at the destinations listed for only \$1499.

Purchase three vacation vouchers. Each voucher is for one week's vacation. Reservations must be for travel ending by December 31, 2017. There are no black out dates. These vouchers can be transferred to friends or family members. All reservations will be based on availability at the time of booking. Some locations have very limited availability during some seasons. The vouchers cannot be combined with other offers or be used in conjunction with any previously booked reservation.

Destinations are available world wide. Here are a few of the most requested destinations:

- Missouri: Branson
- Florida: Orlando, Daytona Beach, Key Largo, Treasure Island, Destin, Panama City
- Carolinas: Hilton Head or Myrtle Beach, SC; Outer Banks, NC
- Nevada: Las Vegas, Tahoe
- Texas: South Padre Island, Canyon Lake, Lake Palestine
- Colorado: Breckenridge
- Hawaii: Molokai, Kauai
- Other destinations may be available. Inquire about options when reserving.

The following restrictions apply:

- Cannot be combined with other offers or be used in conjunction with any previously booked reservation.
- Vouchers are valid for accommodations only.
- Vacations are for 7 nights. Check in day will vary by resort. Shorter stays may be available on request.
- Reservations will be based on availability in the Resort Place Travel system.
- Age restrictions may apply.
- Security deposits, incidentals and certain resort or occupancy fees are required to be paid by the guest at time of check in.

Request a Vacation Quote

Cruise Destinations

Travel Tips

Get Vacation Specials

Email Address*

First Name

Last Name

* = required field

Preferred Format

HTML
 Text

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The screenshot shows a web browser window with the URL <http://resortplacetravel.com/contact-us/>. The page title is "Contact | Resort Place Travel". The navigation menu includes: Destinations, Featured Resorts, Condo Vacations, Online Booking, Resources, Special Deal, and Contact. The main content area is titled "Contact" and provides contact information: "We can be contacted at 479-668-0786." and "Our mailing address is: Resort Place Travel, P.O. Box 23190, Barling, AR 72923". Below this is a contact form with fields for Name, Email, and Comments, and a "Send!" button. The sidebar on the right features a "Request a Vacation Quote" section with links for FAQ, Destinations, and Travel Tips. Below that is a "Get Vacation Specials" section with a form for Email Address*, First Name, and Last Name, radio buttons for Preferred Format (HTML selected, Text unselected), a "Subscribe" button, and a note "powered by MailChimp!". The footer contains the copyright notice "© 2017 Resort Place Travel".

Facebook profile page for Jay Edmonson. The page includes a navigation bar with the name "Jay Edmonson" and a search icon. Below the navigation bar, there is a profile picture, the name "Jay Edmonson", and a "Timeline" dropdown menu set to "2015". A "Home" button and a "Redacted" label are also visible in the top right corner.

The profile information on the left lists: "Pastor at First Baptist Church of Barling", "Studied Information Technology Management at Touro CA", "Lives in Barling, Arkansas", "Married to Dora Edmonson", and "From Russellville, Arkansas".

The "Photos" section shows a large "Redacted" watermark. The "Friends" section shows "Friends · 279" and another large "Redacted" watermark.

The main content area displays three posts:

- \$8k Giveaway**: \$4,000 Food Package + \$4,000 Ammo Gift Cert. WOOBOX.COM. Includes a "Share" button.
- Jay Edmonson** (June 10, 2015): "There are still some summer week available if you haven't planned your vacation yet!". Includes a link to "Branson - Kimberling City Promotion | Resort Place Travel" with details: "The Deal \$499 for 7 Nights at a resort in Kimberling City, MO, for up to 6 people, a \$1,400 value Overlooking Table Rock Lake 10 minutes from Silver Dollar". RESORTPLACETRAVEL.COM. Includes a "Share" button.
- Jay Edmonson** (June 8, 2015) shared a link: "Gulf Coast Getaway | Resort Place Travel". Details: "7-Night Gulf Coast Getaway in Treasure Island, FL area \$1,300 value for \$699 Voucher for 7-night getaway to Treasure Island, Florida for 4 in a fully". RESORTPLACETRAVEL.COM. Includes a "Share" button and 2 likes.
- Jay Edmonson** (March 13, 2015) shared a link: "Special Deal | Resort Place Travel". Includes a "B.O.G.O. SALE" graphic. Details: "BOGO Sale is back for One Day Only Buy a vacation at these resorts... Get a voucher for a free vacation Call 800-925-1213 and use promotion code". RESORTPLACETRAVEL.COM. Includes a "Share" button and 1 like.

At the bottom left, there are language options: "English (US) · Español · Português (Brasil)".