

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FIRST JUDICIAL DISTRICT AT KETCHIKAN**

THE STATE OF ALASKA,)	
)	
v.)	
)	
SONI INC. DBA SONI JEWELERS;)	Case No. 1KE-24-_____ CI
COLORS FINE JEWELERS;)	
SUNITA LAKHWANI)	
_____)	

**STATE’S MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

I. INTRODUCTION

The Defendants in this matter are a jewelry business called Soni Inc. and one of its corporate officers, Sunita “Soni” Lakhwani.

Soni Inc. sells rings, necklaces, bracelets, and other jewelry set with stones that its salespeople tell consumers are made of “Alaska gold quartz” mined, variously, “in the Yukon of Alaska,” “next to Anchorage,” and, on a hand mimicking the shape of Alaska, somewhere in northern Alaska. Soni Inc.’s salespeople earnestly explain how the raw gold quartz is manufactured into jewelry by Soni Inc. They tell customers that the gold in the quartz is pure 24 karat gold worth thousands of dollars per ounce. The salespeople explain to tourists that natural gold quartz only occurs in Alaska and cannot be legally purchased outside of Alaska.

In fact, the stones Soni Inc. sold to undercover investigators as gold quartz mined in Alaska are manufactured imitations. When confronted by the State’s investigators, Ms. Lakhwani defended herself by saying “people ask ‘what is a stone from Alaska?’

The quartz is actually not from Alaska, but it pertains, it signifies Alaska because Alaska had a gold rush.” [Ex. 12 at 6:40] When an investigator asked about where the jewelry was manufactured, Ms. Lakhwani said that her suppliers were based in the U.S. but “I mean, where they get their pieces from that’s their business, I don’t really ask about that.” [Ex. 12 at 38:55] Indeed, Ms. Lakhwani admitted to the state’s investigators that, unknown to customers, the color on tags on the jewelry indicated whether they were natural or not, with orange tags indicating imitation stones and bright yellow and purple tags indicating real ones. [Ex. 12 at 24:00]. Laboratory testing of the imitation stones Soni Inc. sold to undercover investigators as gold quartz mined in Alaska with pure 24 karat gold veins indicated that the veins were made of low purity alloys of roughly half gold. Another “gold quartz” stone contained no gold at all.

In addition, Soni Inc.’s salespeople point customers to elements of Soni Inc.’s jewelry that appear to be gold nuggets and proclaim that these are 24 karat Alaska gold nuggets. In fact, lab testing and the inventory control tags on many of these “nuggets,” including ones that undercover investigators were told were 24 karat Alaska gold nuggets, show that they are actually imitations made of 14 karat gold shaped to resemble a natural nugget.

This conduct violates the Unfair Trade Practices Act, AS 45.50.471 *et seq.* (“UTPA”), which outlaws unfair and deceptive acts and practices in the course of trade or commerce. The attorney general is empowered to enforce the UTPA in the name of the State and to obtain injunctions to stop violations of the UTPA. Here, the State seeks

a temporary restraining order—to remain in place until the Court holds a preliminary injunction hearing—prohibiting the Defendants from continuing to violate the UTPA.

Because the State’s evidence is strong, the State is entitled to preliminary relief under the probable success on the merits test.

In addition, the State is entitled to preliminary relief under the balance of hardships test because the Defendants’ conduct will cause irreparable harm to large numbers of consumers, to other retail stores which compete in the market with the Defendants, and to the State’s overall reputation and business environment. In contrast, preliminary relief requiring the Defendants to engage in honest business practices will not harm them. To the extent that the requested relief can be called “harm,” it is minimal, purely economic, and capable of being protected against.

The Court should issue an immediate TRO to stop the Defendants’ illegal conduct. The TRO should remain in place until the Court is able to hold a preliminary injunction hearing.

II. FACTS

A) Soni Inc.’s jewelry stores.

Soni Inc. does business in Ketchikan through three stores: the Colors Fine Jewelers and Soni Jewelers storefronts on Front Street and a Colors Fine Jewelers “outlet” store inside the Tongass Trading Company building.¹ [See Ex. 6]

¹ <https://colorsfinejewelers.com/> (lasted visited 5/21/24) (describing Soni Jewelers as Colors Fine Jewelers’ “parent company” and listing the addresses for the Colors Fine Jewelers and Soni Jewelers storefronts on Front Street under the heading “Our stores-Alaska”).

B) Misrepresentations made to undercover investigators.

1) The September 13, 2023, undercover purchase from “Soni Jewelers”.

On September 13, 2023, Investigator Virginia Bozeman entered the “Soni Jewelers” store on Front Street posing as a consumer. As Bozeman looked at a display of white stones with golden metallic veins in gold settings, Ms. Lakhwani approached her and asked “anything I can show you over here? Maybe Alaskan gold quartz and gold nuggets?” [Ex. 1 at 0:45] When Bozeman indicated interest, Ms. Lakhwani pulled out a case of gold rings that appeared to feature gold quartz stones and which were marked with yellow and orange tags. [Ex. 1 at 1:20]

Ms. Lakhwani gave Bozeman two orange-tagged rings to try on before offering Bozeman a yellow-tagged ring. [Ex. 1 at 1:30-2:25] As Bozeman looked at the yellow-tagged ring she asked “and this is the gold . . .?” Ms. Lakhwani answered “that’s the gold quartz yeah.” [Ex. 1 at 2:25] Bozeman said, “oh, it looks different.”

Ms. Lakhwani explained that “[its] just a different type of stone—‘cause it’s a natural stone.” [*Id.*] Ms. Lakhwani then told Bozeman “I do have some in sterling silver as well” and directed Bozeman a short distance across the store to a salesman standing at a display of quartz stones with metallic veins set in silver. [Ex. 1 at 2:35]

The salesman, who later identified himself as Guillian Montero, gestured at the jewelry display and told Bozeman that “[t]his is all quartz right here. The one and only natural stone that is from Alaska is this right here and, as a matter of fact, for you to be able to buy it, you have to buy it in the state of Alaska.” [Ex. 1 at 2:45]

Montero told Bozeman that the stone in his display were the same stones she had been looking at with Ms. Lakhwani, just set in sterling silver. [Ex. 1 at 3:20] He repeatedly referred to the stones as “gold quartz” [Ex. 1 at 2:45, 3:20] and told Bozeman that they were mined “in the Yukon of Alaska.” [Ex. 1 at 7:15] Bozeman asked whether she could get a certificate of authenticity and Montero replied while gesturing at the stone “you can get a certificate if you like, make sure you’re getting natural, actually, this one. But we have to do it via email.” [Ex. 2 at 4:55]

As Bozeman purchased the “gold quartz” ring, Montero gestured to Ms. Lakhwani and said, “she’s not only the owner, she’s the designer of most of my pieces.” [Ex. 2 at 5:25]



Figure 1: Excerpt from Ex. 16 showing the ring Bozeman purchased after being told it featured natural gold quartz mined “in the Yukon of Alaska.” Montero would later admit that he knew that the stones set in silver were manufactured. [Ex. 13 at 2:15-3:00] Laboratory testing shows that the veins in this stone were chiefly composed of copper and zinc with a smaller amount of silver. [Ex. 18 at 4, line item 0001]

In the days that followed her purchase, Bozeman followed up with Soni Inc. and asked again for the certificate of authenticity. [Ex. 3 at 1] When she received that

certificate, it listed the stone in her ring not as “gold quartz” but as “silver quartz.” [Ex. 3 at 2]

2) The September 27, 2023, undercover purchase at Colors Fine Jewelers.

On September 27, 2023, Bozeman approached the Colors Fine Jewelers store with Liz Forkan, another Department of Law employee. A sign in the window beside the door prominently advertised “Natural Gold in Quartz.” [Ex. 4 at 0:25] They entered the store and began to look at a display of gold jewelry with quartz stones with golden veins that were marked with yellow and orange tags. [Ex. 4 at 0:58] They were approached by a salesman named “Kacey” who declared to them: “[t]hose are Alaskan gold-in-quartz.” [Ex. 4 at 1:00] Bozeman asked him “and what is that?” He replied “that means that these are the quartz stones jewelry which you get only in Alaska.” [Ex. 4 at 1:00.] Bozeman asked where the stones came from and the salesman answered that they are from “northern Alaska, from next to Anchorage. The mine is there.” [Ex. 4 at 1:10.] Kacey then pulled out a stone that appeared to have gold quartz in it and said, “it comes like a rock, like that” “from that—this type of pieces, we make jewelerys [sic].” [Ex. 4 at 1:25.]



Fig. 2: cropped screenshot from Ex. 4 at 1:34: the stone the Soni Inc. salesman demonstrated.

Kacey told Bozeman that the veins in all of the quartz stones were 24 karat gold. [Ex. 4 at 1:35] “Buying something like that,” he said, “it will hold value. Value for money is [unintelligible]. Because right now gold per ounce is two thousand dollars per ounce.” [Ex. 4 at 1:45] When Bozeman asked Kacey where the jewelry was made, he answered “well, we bring it from the mine and we make it by ourselves. It’s a manufacturing company also.” [Ex. 4 at 1:55] He told Bozeman: “that’s why we can give away like in a cost-to-cost price.” [Ex. 4 at 2:10.]

Kacey pulled out a pair of earrings with gold quartz and gold nuggets that were marked with an orange tag. He described the stone in the earrings as “gold-in-quartz” and told Bozeman: “this is 24 karat gold nugget. And—you see these veins?—they are also 24 karat gold veins.” [Ex. 4 at 3:03] He explained that “it’s a raw Alaskan gold nugget.” [Ex. 4 at 3:25]



Fig. 3: zoomed-in and cropped screenshot from Ex. 4 at 3:14: the earrings the Soni Inc. salesman claimed included “gold-in-quartz” with 24 karat gold veins and 24 karat “raw Alaska gold nugget[s].”

Bozeman asked Kacey if he had a pendant like the earrings. [Ex. 4 at 5:15] Kacey pulled out a pendant marked with an orange tag that apparently included gold quartz and a gold nugget. [Ex. 4at 6:35]

Kacey claimed to be the owner of the shop (he is not). [Ex. 4 at 10:15; *See* Ex. 6] He vouched for his own truthfulness, even telling Bozeman as he discussed a certificate of authenticity “[i]f I am giving you this certificate, whatever I will be written here, that have to be like that. If not, I need to close my shop. No, that’s how it works. If I sell you something fake which is not like that, I need to close my shop. So what—for fifteen hundred dollar will cost my million dollar shop? [sic]” [Ex. 5 at 1:40]

Kacey took pains to emphasize that the gold quartz he was selling was authentic Alaskan gold quartz. He explained that the stones in the jewelry on display were provided to Soni Inc. with paperwork authenticating that the stones were sourced from the mine he had said was next to Anchorage. [Ex. 5 at 2:20] Kacey claimed that then “we meld them in thousand degrees Celsius . . . the gold melts, but the rock cracks. And that’s natural.” [Ex. 5 at 2:30] Kacey took out a display case in which an orange tag was clearly visible and explained how a person could tell that the gold quartz stones were



Figure 4: Excerpt from Ex. 16, page 2 showing the pendant Bozeman purchased after being told it featured gold quartz mined “next to Anchorage” with 24 karat gold veins. Ms. Lakhwani would later admit that jewelry marked with an orange tag, as this piece was, contained manufactured stones. [Ex. 12 at 24:30] Lab testing shows that the veins in this stone were a low-purity alloy of gold, copper and silver and that the “nuggets” the salesman had indicated were 24 karat Alaska gold nuggets are actually 14 karat—the same low purity as the setting. [Ex.18 at 1; 4, line item 0002]

“natural” because of how the veins of quartz were different in each stone. [Ex. 5 at 2:45]

Bozeman purchased the orange-tagged pendant Kacey had shown her. Kacey provided Bozeman with a certificate of authenticity that read “14kt Yellow Gold Pendant Gold-in-Quartz & Gold Nugget.” [Ex. 7] Bozeman asked Kacey “are there

other types of gold quartz? ‘Cause it doesn’t say Alaska.” [Ex. 5 at 8:15] Kacey immediately replied “No, it’s the gold-in-quartz. That is Alaskan gold-in-quartz. Gold-in-quartz comes only Alaska [sic]” [Id.] Bozeman exclaimed “Oh! It doesn’t come from anywhere else.” [Id.] Kacey replied “no” and shook his head. He explained “gold-in-quartz means it’s from Alaska.” [Id.]

3) The September 27, 2023, visit to Soni Jewelers.

After their purchase at Colors, Bozeman and Forkan visited the Soni Jewelers store. They were greeted by Ms. Lakhwani and a salesman who later identified himself as Amouri Norris. [Ex. 8 at 0:40; 7:18] Norris told them: “we have some Alaska gemstone over here, you looking for something in particular?” [Ex. 8 at 0:45] Bozeman asked him “what is this?” [Id.] “We have some Alaska gold quartz here,” Norris answered, gesturing at the display of quartz stones set in silver that Montero had stood over on September 13. [Id.] Norris moved back behind the display, which included a large pendant made of a black stone with metallic veins. Bozeman asked what the stone was and Norris replied: “same thing: quartz.” [Ex. 8 at 1:10] When Forkan asked if the black quartz was from Alaska, Norris answered: “the one that is Alaskan-Alaskan is gonna be, like, the white one. You find these ones [referring to the “black quartz”] like all over some parts of Canada.” [Ex. 8 at 1:20]

Norris explained how the gold quartz jewelry was made. Referring to the unworked gold quartz stone that Bozeman told him Kacey had shown her at Colors, Norris told Bozeman: “that’s what we can get. And we have our own jewelers. We own jewelers for over a quarter of century—twenty-six years I think they’re might be

jewelers. So they—they’re have a, like, experience working with delicate gemstones [sic].” [Ex. 8 at 3:15] Norris told them “I’m not sure where, like, gold quartz—you know, Alaska’s so big.” But Norris made the shape of Alaska with his hand and indicated that the gold quartz came from somewhere in northern Alaska. [Ex. 8 at 4:22; Ex. 19 at ¶ 4]

Bozeman asked Norris where the jewelry was made and Norris answered: “Mostly Ketchikan.” [Ex. 8 at 5:00] He explained, “my jewelers, they’re right here. But y’know here it gets a little slow during the winter right? So we . . . is when we take advantage of the time. So instead of selling, we more into repairs, customer service, and making. And that’s more in Florida [sic].” [Ex. 8 at 5:15]

4) The September 28, 2023, undercover purchases at the Colors Fine Jewelers outlet in the Tongass Trading Company building.

The next day, Bozeman and Forkan visited the Colors Fine Jewelers location in the Tongass Trading Company building on Front Street. They approached a display case full of jewelry marked with orange and yellow tags that featured white and black stones with metallic veins. [Ex. 9 at 1:08.] The salesman asked if there was anything they liked and Bozeman replied: “I mean, this, uh—.” “Gold quartz” supplied the salesmen, who gave his name as “Nick.” [Ex. 9 at 1:25; 22:35] Nick showed them jewelry made with a black stone that contained copper and gold colored veins. [Ex. 9 at 1:45] Nick claimed that these stones were “black quartz” that was mined in Alaska. [*Id.*] He claimed the veins were “24 karat pure gold” and “pure copper.” [Ex. 9 at 2:40.] He told Bozeman that “copper and gold are almost same value nowadays.” [*Id.*] He claimed that copper is

\$900 an ounce. [Ex. 9 at 3:00] (In fact, Copper on the New York Mercantile Exchange in September 2023 was under four dollars a *pound*).²



Fig. 5: an excerpt from Ex. 9 at 2:25 showing the ostensibly Alaskan-mined “black quartz” with copper and gold veins.

At Bozeman’s request, Nick pulled out a ring that included a white quartz stone with gold metallic veins and what appeared to be a gold nugget. [Ex. 9 at 4:20] The ring was marked with an orange tag. [Ex. 9 at 4:25] Nick stated that the gold nugget was “mined in Alaska.” [*Id.*] He showed Bozeman and Forkan an unworked stone that appeared to be a piece of quartz with veins of gold in it and he explained how the jewelry was made from the stone: “this is the way it’s found—the quartz.” [Ex. 9 at 4:40] “You see the veins in there? You see the 24 karat gold in there? So when you get polished, you see the veins shiny [*sic*].” [*Id.*]

As Nick attempted to persuade Bozeman to purchase a ring marked with an orange tag that appeared to feature gold quartz stones and gold nuggets, [Ex. 9 at 7:21; 8:53] he told her that “you will get all the certificates and guarantees to go with it . . .

² *Copper Continuous Contract*, MARKETWATCH (May 6, 2024 1:15 pm) <https://www.marketwatch.com/investing/future/hg00>.

that you are getting pure 24 karat gold nugget in there, a gold quartz which is mined in Alaska and plus the 14 karat gold.” [Ex. 9 at 8:00] He explained “in 48 states you will not find it . . . you can’t find gold quartz over there because the Alaskan government doesn’t want this to be sold in all the states.” [Ex. 9 at 8:20]

As they discussed return policies on the jewelry, Nick explained that Bozeman could return the ring if the stone fell out because “that manufacturing is ours.” [Ex. 9 at 14:54] He told Bozeman that the jewelry was made in Anchorage, and that “[t]he stone is mined in the Yukon, so we buy the stone, we do cutting, and we do manufacturing, all that. This is the local manufacturing. This is not done in Los Angeles or in China or in Hong Kong. This is local manufacture.” [*Id.*]

As Nick wrote out a certificate of authenticity for a small ring that appeared to be composed of two pieces of gold quartz and two gold nuggets, he explained that the two nuggets were each 1.5 grams for a total of three grams of gold. He told Bozeman that “pure gold is like twenty-three hundred an ounce. So like, you’re getting three. So . . . it has a value.” [Ex. 9 at 24:19]



Figure 6: Excerpt from Ex. 16, page 49 showing the ring Bozeman purchased after being told it contained gold quartz mined in Alaska and 24 karat Alaska gold nuggets. Ms. Lakhwani would later admit that jewelry marked with an orange tag, as this piece was, contained manufactured stones. [Ex. 12 at 24:30] Lab testing indicates that the veins in these stones were a low-purity alloy of gold, copper and silver and that the “nuggets” the salesman had indicated were 24 karat Alaska gold nuggets are actually 14 karat—the same low purity as the setting. [Ex. 18 at 4, Line item 0023]

The certificate of authenticity Nick ultimately provided to Bozeman read:

“14KT Yellow Gold Ladies Ring
with Golden Quartz & Gold Nugget
14KT:- 3.8grm 2gqz:- 0.06ct G.N:- 3.00grm.”
[Ex. 10]

5) The September 28, 2023, visit to Soni Jewelers

After their purchase at the Tongass Center, Bozeman and Forkan visited Soni Jewelers. At the display of apparent gold quartz set in gold, they were greeted by Montero, who launched into his sales pitch. “Let me give you a little explanation about here,” he said, gesturing at the display of what appeared to be gold quartz and gold nugget jewelry, many with orange tags. [Ex. 11 at 0:40; 2:36] “This is the one and only natural stone that is mined in Alaska. This one right here. As a matter of fact, for you to be able to get this, you have to get it in the state of Alaska.” [*Id.*] “This actually right

here, in Alaska, only. This is natural, and it has natural 24 karat gold in between of the quartz [sic].” [Ex. 11 at 1:15]

Montero pulled out a small gold nugget that he said was 24 karat gold and told Bozeman: “the price of gold on the market right now, today, today’s price is 1978 [unintelligible] per ounce. Every ounce has 28 grams. You’re looking at about 70 dollars a gram for regular gold. The price of a gold nugget is times three.” [Ex. 11 at 1:49] Montero pointed down at the display case and said “the reason is, this is natural 24 karat. You might find gold nuggets, for example in San Francisco, but most of their gold nuggets are between 21 and 22 karat, not 24.” [Ex. 11 at 2:00]

Ms. Lakhwani entered the store from the back and greeted Bozeman and Ms. Forkan. Bozeman asked Montero, “didn’t you tell me last time she designs them?” Montero responded: “yeah, yeah, she’s the owner in fact.” [Ex. 11 at 3:12]

Bozeman asked Ms. Lakhwani where she designed the jewelry. Ms. Lakhwani answered: “we work with a lot of factories in Los Angeles and New York.” [Ex. 11 at 4:10] As Ms. Lakhwani talked about which pieces her company designed, Ms. Forkan could be heard talking to Montero about where the jewelry was made. Bozeman asked Ms. Lakhwani: “you make them in Alaska?” Ms. Lakhwani replied, “yeah, yeah. Well, our factory, actually—those ones are made in Los Angeles, but the stone comes from Alaska.” [Ex. 11 at 4:40] Bozeman replied: “[w]e were down at Colors and he said he had a place in Anchorage that he makes them? I don’t remember what he said.” Ms. Lakhwani responded: “we have a place there also as well,

just a little workshop, we have a jeweler, a local jeweler that makes some pieces.” [Ex. 11 at 5:00]

C) Execution of the impound order.

On September 24, 2023, Judge Lybrand issued an impound order in case 1KE-23-00286CI authorizing agents of the Department of Law to impound up to 20 products at the Soni Inc. stores on Front Street. The Department executed the order on September 28, after the undercover visits described above.

1) The execution of the impound order at Soni Jewelers.

Employees of the Department of Law entered Soni Jewelers and collected ten of the pieces of jewelry for impound and testing. As they did so, Bozeman interviewed Ms. Lakhwani.

Ms. Lakhwani stood at the display of jewelry in silver settings which included stones that she had previously indicated to Bozeman were Alaska gold quartz and which Montero and Norris had emphatically claimed featured natural gold quartz mined in Alaska. [Ex. 12 at 6:30; Ex. 1 at 2:35; Ex. 1 at 2:45, 3:20; 7:15; Ex. 8 at 0:45. 4:22] Bozeman asked Ms. Lakhwani: “do you ever claim this gold quartz is natural gold quartz?” [Ex. 12 at 6:30] Ms. Lakhwani replied: “[n]o, it’s a natural quartz, but not natural gold quartz.” [*Id.*] Bozeman asked Ms. Lakhwani where she told customers the stones came from and she answered “[w]ell we say the stone—with the stone we don’t—people ask ‘what is a stone from Alaska?’ The quartz is actually not from Alaska, but it pertains, it signifies Alaska because Alaska had a gold rush.” [Ex. 12 at 6:40] Bozeman asked Ms. Lakhwani where the jewelry came from. Ms. Lakhwani told

Bozeman that “we personally don’t make it, we have a manufacturer in Los Angeles that makes these pieces.” [Ex. 12 at 8:12] Ms. Lakhwani identified her primary supplier of gold quartz as “TT jewelry.” [Ex. 12 at 8:55] When Bozeman asked Ms. Lakhwani whether the stones in the display case were manufactured stones, Lakhwani answered “I’m not a hundred percent sure, to be honest with you. But I’d have to ask the manufacturer all the specifics about the stone.” [Ex. 12 at 12:03]

Bozeman asked Ms. Lakhwani whether she told customers that the gold nuggets in her display case were real. Ms. Lakhwani answered, “no, this is 14 karat gold nugget over sterling silver.” [Ex. 12 at 10:30]

Bozeman and Ms. Lakhwani moved over to the display case with gold settings that she and Montero had indicated featured Alaska gold quartz. Bozeman asked: “now, are all these gold pieces the manufactured ones as well?” [Ex. 12 at 21:49] Ms. Lakhwani answered that “there’s a mix of everything. There’s gold-in-quartz and there’s ‘glacier gold.’” [Ex. 12 at 21:49] Ms. Lakhwani explained that “‘glacier gold’ is basically the infused gold . . . Where the gold is put into the stone.” [Ex. 12 at 22:00]

Bozeman asked Ms. Lakhwani whether the gold nuggets in this case were plated and Ms. Lakhwani answered that “some of these are actual nuggets” but acknowledged that not all of them were. [Ex. 12 at 22:20]

Bozeman asked Ms. Lakhwani to pull out a display tray of what appeared to be gold quartz jewelry set in gold. [Ex. 12 at 23:30] Bozeman asked Ms. Lakhwani “are these ones manufactured or real?” [Ex. 12 at 23:40] Ms. Lakhwani told her “[t]hese ones are manufactured. These are 14 karat and this is a ‘glacier gold’” [Ex. 12 at 23:40]

Bozeman asked Ms. Lakhwani which pieces in the display case were actually real and Ms. Lakhwani pointed to several pieces interspersed among the others and explained “the ones you see that have a pink tag on them. And that’s so we have a pink tag on them to differentiate them from the others. And the ones that have a bright yellow tag on them.” [Ex. 12 at 24:00] Bozeman asked “so the orange tags are manufactured?” Ms. Lakhwani responded “correct.” [Ex. 12 at 24:30]



Fig. 7: An excerpt from Ex. 12 at 14:17. Ms. Lakhwani acknowledged that that the only real gold quartz stones are marked with pink or bright yellow tags

Bozeman asked Ms. Lakhwani about where the manufacturers Soni Inc. purchased jewelry from were based. [Ex. 12 at 38:45] She answered “who we deal with, mostly everybody is in the United States. I mean, where they get their pieces from that’s their business, I don’t really ask about that.” [Ex. 12 at 38:55]

Assistant Attorney General Lael Harrison interviewed Montero during the execution of the impound order. Montero stated that he was a sales employee of the store and that this was his second year there. [Ex. 13 at 0:11] Harrison asked Montero what he told potential customers about the gold quartz he sold, and Montero answered “[e]verybody knows that gold quartz is from Alaska. So pretty much is, that they came and they say ‘is this from Alaska?’ and we said ‘yes, but that one is not natural [indicating the display of stones set in silver]—this one is natural, the one with gold.” [Ex. 13 at 2:15] Harrison asked him to clarify what he meant by “not natural,” and Montero explained “well, sometimes what happens is, they enhance the gold quartz.” [Ex. 13 at 2:30] Harrison asked what that meant and Montero told her “it’s a process they use in jewelry to make it—to put the gold in it. On the actual gold quartz.” [*Id.*]

Harrison asked him about the origin of the jewelry and Montero told her that the gold quartz jewelry came from a supplier in Los Angeles. [Ex. 13 at 3:30; 4:55] Harrison asked Montero whether he told customers that the gold quartz pieces set in gold were from Alaska and he answered “everybody thinks that’s from Alaska. So if the customer asks ‘it’s from Alaska?’ I’ll probably say ‘yes’ . . . But the piece come from LA.” [Ex. 13 at 5:10] Harrison asked Montero if he knew where the gold quartz stones

in the jewelry came from and he answered “no, how would I know that?” [Ex. 13 at 5:30]

2) The execution of the impound order at Colors Fine Jewelers.

At the same time the impound order was executed at Soni Jewelers, Department of Law employees executed the impound order at the Colors Fine Jewelers location on Front Street. As the impound order was carried out, Department of Law employee Ben Merkouris interviewed Raju Lakhwani, the owner and President of Soni Inc. [Ex. 6 at 2; Ex. 14 at 6:15; Ex. 12 at 9:45]

Mr. Lakhwani told Merkouris that his jewelry was purchased from vendors based in “the United States. Like, California and New York.” [Ex. 14 at 7:30] Mr. Lakhwani acknowledged that all of the jewelry in his store could also be purchased in the lower 48. [Ex. 14 at 7:47]

Merkouris asked Mr. Lakhwani if he ever claimed that his gold quartz was natural gold from Alaska. [Ex. 14 at 8:08] Mr. Lakhwani answered: “natural gold, but not from Alaska.” [*Id.*] Mr. Lakhwani later claimed that he sold some pieces made from gold quartz produced in Alaska made by a company in Juneau and marked with the “trademark stamp for Alaska” sticker (presumably the “Made in Alaska” logo), but he was unable to name the company. [Ex. 14 at 16:20] No gold quartz jewelry that was visible in any of Soni Inc.’s displays included a “Made in Alaska” sticker. [Ex. 19 at ¶ 2; *See* Ex. 1; 2; 4; 5; 8; 9; 11; 12; 14]

D) The results of the State's impound.

The Department of Law impounded eighteen pieces of jewelry set in gold and marked with orange tags and two pieces of jewelry set in silver and marked with white tags. [Ex. 16, Ex. 19 at ¶ 14, Ex 20 at ¶ 3]

1) The results of lab testing.

The twenty items impounded by the Department of Law and the three items purchased by Bozeman were tested by a U.S. Customs and Border Protection lab in Chicago. [Ex. 18; Ex. 19 at ¶ 5] The three stones purchased by the Department of Law were subject to additional destructive testing. [Ex. 18 at 4]

Destructive testing of the stones in the two orange-tagged pieces that Bozeman had purchased at the two Colors stores demonstrated that, while the white stones were quartz, the veins of "gold" were about half gold with "a substantial amount of copper, and to a lesser extent silver." [Ex. 18 at 4, line item 0002, 0023]

The lab report also revealed that the "gold quartz" stones set in silver contained no gold at all. The lab was unable to detect any gold in the stone in the silver ring with gold quartz that was impounded by the State. [Ex. 18 at 4, line item #0001] When the lab destroyed the stone in the silver ring Bozeman purchased from Montero, it found that "the golden metal from the stone is composed primarily of copper, followed by zinc, and to a smaller extent sliver. [sic] No gold was detected." [Ex. 18 at 4, line item 0001]

As for the gold nuggets, the “nuggets” on the other silver impounded piece marked with a white tag stating “24k” were actually 24 karat. [Ex 17, Ex. 18 at 13, line item 0013] But every one of the sixteen orange-tagged pieces that appeared to have gold nuggets were in fact 14k gold.³ That is, the “nugget” was the same low purity gold as the setting. This including a pair of earrings of the exact same style as the ones Kacey had specifically described as containing 24 karat “raw Alaska gold nugget[s].” [Ex. 18 at 3, line item 0018; Ex. 4 at 3:25]



Fig. 8: Excerpt from Ex. 16 at page 38 showing a pair of earrings of an identical style to the ones a Soni Inc. salesman described as including “24 karat” “raw Alaska gold nugget[s].” Lab testing showed that these “nuggets” were 14 karat gold. [Ex. 18 at 3, line item 0018] Indeed, the tag on the piece clearly indicates that it only contains 14 karat gold.

³ For ease of reading, the following are citations to the lab results in Exhibit 18 and the corresponding pictures of imitation gold nuggets: line item 0002, Ex. 16 at 2; line item 0003, Ex. 16 at 3-5; line item 0004, Ex. 16 at 6-7; line item 0007, Ex. 16 at 12-13; line item 0009, Ex. 16 at 16-18; line item 0010, Ex. 16 at 19-21; line item 0011, Ex. 16 at 22-24; line item 0012, Ex. 16 at 25-27; line item 0015, Ex. 16 at 32-33; line item 0016, Ex. 16 at 34-35; line item 0017, Ex. 16 at 36-37; line item 0018, Ex. 16 at 38-39; line item 0019, Ex. 16 at 40-41; line item 0021, Ex. 16 at 44-45; line item 0022, Ex. 16 at 46-48; line item 0023, Ex. 16 at 49.

2) Defendant's misrepresentations did not match the tags on their jewelry.

Ms. Lakhwani repeatedly claimed that Soni Inc. simply represents to consumers the information that is provided on the tag of the piece of jewelry that was attached by the supplier. [Ex. 12 at 6:12] But in fact, the Defendants made misrepresentations to Bozeman that were inconsistent with the tags on the jewelry.

Each of the orange tags on items with imitation "gold nuggets" indicated the purity of the gold was 14k.⁴ Yet Soni Inc. salespeople specifically claimed that orange-tagged imitation gold nuggets were pure 24 karat gold.

Furthermore, during the impound, the State discovered that each of the "gold quartz" stones set in silver included a tag with the code "SIQZ" indicating that they are "silver quartz." [Ex. 15] But Ms. Lakhwani indicated that they were gold quartz when she sent Bozeman across the store to look at them, and Montero and Norris repeatedly referred to them as "gold quartz." However, it is clear that the Defendants were aware that that these stones were not gold quartz because the stone in the silver ring purchased by Bozeman on September 13, 2023 was described as "silver quartz" on the certificate of authenticity provided to Bozeman days after her purchase. [Ex. 3] Though this is itself a misrepresentation because the metal in this stone was mostly copper and zinc. [Ex. 18 at 4, line item 0001]

⁴ *supra*, note 2.



Fig 9: Excerpt of Ex. 16 page 31 showing a ring from the display Soni Inc.'s salespeople had repeatedly claimed contained "gold quartz" demonstrating that it is actually marked with a label indicating it is "silver quartz." Testing of this stone showed that the veins were mostly copper and zinc with a smaller amount of silver. Ex. 18, Line item 0014.

III. ARGUMENT

A. The requested relief.

The State respectfully requests that the Court issue a TRO and a preliminary injunction with the following terms. For the purpose of these terms, Gold Quartz means stones the Defendants refer to as "gold quartz," "golden quartz," "gold-in-quartz," and "glacier gold" and also includes all stones that appear to have veins of metal running through them regardless of whether the stone is quartz or if the metal is other than gold (e.g. "gold quartz" which includes no gold, "silver quartz," and "black quartz" with

copper veins). “Gold Nugget” means anything that is, or has the appearance of, a naturally occurring gold nugget (e.g. the “gold nuggets” in figures 3, 4, 6, and 8 of the State’s Motion for Temporary Restraining Order and Preliminary Injunction).

For the purpose of these terms, Gold Quartz means stones the Defendants refer to as “gold quartz,” “golden quartz,” “gold-in-quartz,” and “glacier gold” and also includes all stones that appear to have veins of metal running through them regardless of whether the stone is quartz or if the metal is other than gold (e.g. “gold quartz” which includes no gold, “silver quartz,” and “black quartz” with copper veins). “Gold Nugget” means anything that is, or has the appearance of, a naturally occurring gold nugget (e.g. the “gold nuggets” in figures 3, 4, 6, and 8 of the State’s Motion for Temporary Restraining Order and Preliminary Injunction).

(1) The Defendants are specifically prohibited from making any of the following claims orally or in writing in the course of advertising, selling, or offering for sale any Gold Quartz or Gold Nugget jewelry:

- a) that Gold Quartz can only be purchased in Alaska;
- b) that Gold Quartz only comes from Alaska;
- c) that the jewelry Defendants sell that has been marked with a tag with the code with “SIQZ” is “gold quartz” or “silver quartz;”
- d) that Soni Inc. manufactures jewelry;
- e) that Soni Inc.’s jewelry is manufactured in Alaska;
- f) that the Gold Quartz Defendants sell was mined in Alaska or is otherwise “Alaska gold quartz” or from Alaska;

g) that the Gold Nuggets Defendants sell were mined in Alaska or are otherwise “Alaska gold nuggets” or from Alaska;

(2) Notwithstanding ¶1, the Defendants may make the statements listed in ¶1(d)-(g) if they are true and the Defendants provide notice to the Plaintiff as described in this paragraph. Defendants shall provide notice to the Plaintiff of their intent to make specific representations about specific pieces. Such notice shall include a photograph of the piece, any inventory control codes associated with the piece, the name of the person from whom the Defendants acquired the piece, and a description of the facts supporting the Defendants’ claim and all documentation in their possession relevant to the claim. The notice shall be provided to consumerprotection@alaska.gov and ginger.bozeman@alaska.gov.

(3) Defendants must attach a tag stating “Imitation stone” in 12 point font to each piece of jewelry that

(a) includes a Gold Quartz stone which is or was marked with an orange tag or a tag including the code “SIQZ;”

(b) any Gold Quartz stone for which the Defendants do not possess documentation demonstrating that the stone is natural quartz with naturally occurring veins of metal.

These tags must be visible when the items are displayed for sale and must remain on the item when it is provided to the purchaser.

(4) Defendants must attach a tag stating “Imitation nugget” in 12 point font to each piece of jewelry that includes a Gold Nugget

(a) that is or was marked with an orange tag stating
“14k;”

(b) that is cast, plated, or otherwise an imitation of a
natural gold nugget;

(c) for which the Defendants do not possess
documentation demonstrating that the nugget is a natural nugget.

These tags must be visible when the items are displayed for
sale and must remain on the item when it is provided to the
purchaser.

(5) For each Gold Nugget and Gold Quartz piece which the
Defendants have not marked as an “Imitation stone” or “Imitation nugget” the
Defendants must maintain in the store where it is being sold documentation
demonstrating that the piece includes a naturally occurring nugget or natural stone with
naturally occurring veins of metal.

(6) Agents of the State of Alaska may enter Soni Inc.’s stores without
identifying themselves to ensure compliance with this injunction. Agents of the State of
Alaska may also identify themselves and request to see the documentation described in
paragraph 5. Upon such request, Soni Inc. shall provide such documentation
immediately.

(7) All receipts and certificates of authenticity provided to customers
must clearly state whether any Gold Quartz or Gold Nugget element is an imitation
stone or nugget and accurately describe the karat purity of any Gold Nugget element.

(8) The Defendants shall preserve all currently extant copies and future invoices, shipping labels, and other similar documents that identify the persons Defendants purchased Gold Quartz and Gold Nugget products from, the locations from which the products were shipped, and the country of origin in which the products were manufactured.

(9) The Defendants shall preserve all currently extant copies and future customer receipts and certificates of authenticity provided to customers for Gold Quartz and Gold Nugget products.

(10) The Defendants shall not make any false or misleading statements, whether oral or in writing, in the course of advertising, selling, or offering for sale any product and will otherwise comply with AS 45.50.471 of the Unfair Trade Practices and Consumer Protection Act.

B. Standards for preliminary relief.

A plaintiff may obtain preliminary relief under either of two standards: the probable success on the merits standard or the balance of hardships standard.⁵

Under the probable success on the merits standards, a plaintiff must make a clear showing of probable success on the merits.⁶

Under the balance of hardships test, preliminary relief will be granted if: (1) the plaintiff is faced with irreparable harm; (2) the opposing party can be adequately

⁵ *State v. Galvin*, 491 P.3d 325, 332 (Alaska 2021).

⁶ *Id.* at 333.

protected; and (3) the plaintiff raises serious and substantial questions going to the merits of the case.⁷

In this case, the State is entitled to temporary relief under both standards.

C. The State’s evidence demonstrates probable success on the merits.

1. The elements of the State’s UTPA claims.

The UTPA outlaws “unfair or deceptive acts or practices in the conduct of trade or commerce.”⁸ There are two ways to prove that conduct is unfair or deceptive. The first is to prove that an act or practice is unfair or deceptive under the standards laid out by the Alaska Supreme Court in *State v. O’Neill Investigations, Inc.*, 609 P.2d 520 (Alaska 1980). The second is to prove that the conduct violates one of the per se unfair or deceptive practices listed in AS 45.50.471(b).

Under *O’Neill*, an act or practice is deceptive “if it has the capacity or tendency to deceive. Actual injury as a result of the deception is not required. Intent to deceive need not be proved. All that is required is a showing that the acts and practices were capable of being interpreted in a misleading way.”⁹

The *O’Neill* court also provided factors to determine whether an act or practice is unfair. Those factors are:

- (1) whether the practice, without necessarily having been previously considered unlawful, offends public policy as it has been established by statutes, the common law, or

⁷ *Alsworth v. Seybert*, 323 P.3d 47, 54 (Alaska 2014).

⁸ AS 45.50.471(a).

⁹ *State v. O’Neill Investigations, Inc.*, 609 P.2d 520, 534-35 (Alaska 1980) (internal citations omitted).

otherwise whether, in other words, it is within at least the penumbra of some common-law, statutory, or other established concept of unfairness;

- (2) whether it is immoral, unethical, oppressive, or unscrupulous; [and]
- (3) whether it causes substantial injury to consumers (or competitors or other businessmen).¹⁰

The State is not required to prove all three factors. Rather, “[a] practice may be unfair because of the degree to which it meets one of the criteria or because to a lesser degree it meets all three.”¹¹

In addition to the *O’Neill* standards, AS 45.50.471(b) lists numerous acts or practices that are per se unfair or deceptive, including:

(b)(2)—falsely representing or designating the geographic origin of goods or services;

(b)(4)—representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that the person does not have;

(b)(6)—representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another;

(b)(11)—engaging in any other conduct creating a likelihood of confusion or of misunderstanding and that misleads, deceives, or damages a buyer or a competitor in connection with the sale or advertisement of goods or services; and

(b)(12)—using or employing deception, fraud, false pretense, false promise, misrepresentation, or knowingly concealing, suppressing, or omitting a material fact with intent that others rely upon the concealment, suppression, or omission in connection with the sale or advertisement of goods or services whether or not a person has in fact been misled, deceived, or damaged.

¹⁰ *Id.* at 535.

¹¹ *Alaska Tr., LLC v. Ambridge*, 372 P.3d 207, 226 n. 113 (Alaska 2016).

2. Defendant's false statements about the products they sold violate the UTPA.

As explained in the Facts Section, the evidence shows that the Defendants sell imitation gold quartz and gold nugget jewelry they purchased from out-of-state companies by making a consistent set of misrepresentations: that the jewelry is manufactured by Soni Inc from natural gold quartz mined in Alaska; that the gold in the quartz and in the "gold nuggets" is pure 24 karat gold; and that a person cannot legally buy Alaska gold quartz outside of the State of Alaska. More than once, Ms. Lakhwani personally misrepresented to Bozeman that the quartz stones in her jewelry were from Alaska.

This conduct easily meets the *O'Neill* test for deception, under which "[a]ll that is required is a showing that the acts and practices were capable of being interpreted in a misleading way."¹²

The Defendants' conduct is also unfair under the *O'Neill* factors. The Defendants sell imitation gold quartz and gold nugget jewelry by misrepresenting that they have characteristics that would make them far more valuable than they actually are. There is substantial evidence that these misrepresentations were made to consumers with the knowledge that they were false. Ms. Lakhwani presented orange-tagged imitation pieces to Bozeman after representing to her that they were "Alaska gold quartz." In another visit, Ms. Lakhwani again told Bozeman that the stones in the gold setting came from Alaska even though she later admitted that she knew that many of them were imitations and that

¹² *O'Neill*, 609 P.2d at 535.

she did not actually know the source of the jewelry. Montero frankly admitted that he told customers that he was selling gold quartz from Alaska even though he knew the jewelry came from a supplier in Los Angeles and he did not know where the stones came from. Finally, Soni Inc.'s salespeople consistently represented to consumers that stones with tags marking them as "silver quartz" were "gold quartz" and that pieces of jewelry included 24 karat Alaskan gold nuggets when the tags clearly showed that the only gold in the piece was 14 karat.

This conduct is offensive to public policy and in violation of state law.¹³ It is also unscrupulous, immoral, and unethical. Further, the conduct harms multiple categories of persons: consumers who wished to purchase gold quartz and nuggets that were actually mined and made into jewelry in Alaska, and honest retailers and craftspeople who sell or make items in Alaska and who must compete in the marketplace against Soni Inc.'s falsely advertised items.

Finally, the Defendants' conduct constitutes per se violations of the UTPA, including: AS 45.50.471(b)(2)—for falsely representing the geographic origin of goods, (b)(4) and (b)(6)—for misrepresenting the qualities, components, and characteristics of the jewelry, (b)(11)—for creating a likelihood of confusion or misunderstanding that misleads, deceives, or damages a buyer or competitor, and (b)(12)—for employing deception, fraud, misrepresentation, or omitting a material fact.

D. The State should also prevail under the balance of hardships test.

¹³ See e.g., AS 45.11.76.600 (scheme to defraud); AS 11.46.180 (theft by deception).

Even if the Court were to find that the State has not shown a clear probability of success on the merits, the State should still obtain preliminary relief under the balance of hardships test because: (1) the State faces irreparable harm; (2) the opposing party can be adequately protected; and (3) the State has raised serious and substantial questions going to the merits of the case.¹⁴

1. Irreparable harm.

The first question under the balance of hardships test is whether the plaintiff faces irreparable harm.

Because the State brings this action under the attorney general's mandate to protect the public from unlawful conduct, the court should presume that the allowing the Defendants' conduct to continue will cause irreparable harm. The State always has a compelling interest in stopping violations of consumer protection laws, like the UTPA, which is why the legislature empowered the attorney general to seek injunctions to stop UTPA violations.¹⁵ The legislature's policy decision to provide the attorney general with the power to stop UTPA violations would be thwarted if courts allowed violations to continue until the conclusion of a trial (which often takes several years).

¹⁴ See *Alsworth*, 323 P.3d 47, 54 (Alaska 2014) (explaining the probable success on the merits standard).

¹⁵ See AS 45.50.501(a) (authorizing the attorney general to seek an injunction if he has "reason to believe that a person has used, is using, or is about to use an act or practice declared unlawful in AS 45.50.471").

While there appears to be no case law in Alaska on this issue, numerous courts in other jurisdictions have held that in State enforcement actions, irreparable harm is presumed.¹⁶

But in this case, the Court should find irreparable harm even without an automatic presumption. Irreparable harm is an injury which, “because it is so large or so small, or is of such constant and frequent occurrence, or because no certain pecuniary standard exists for the measurement of damages, cannot receive reasonable redress in a court of law.”¹⁷

If the Defendants are allowed to continue their unlawful conduct until trial, consumers will purchase their products because of the misrepresentations and material omissions the Defendants have made. It will be nearly impossible to locate and reimburse these consumers. And even if all the consumers are located, the scale and

¹⁶ See e.g., *Miami-Dade Cty. v. Fernandez*, 905 So.2d 213, 215 (Fla. 3d DCA 2005) (The required “showing is relaxed when an injunction is sought by a governmental entity to enforce its police powers. In such circumstances the municipality need not come forth with proof to show irreparable harm or lack of an alternate remedy.”); *Com. ex rel. Corbett v. Snyder*, 977 A.2d 28, 41 (Pa. Commw. Ct. 2009) (“where the Commonwealth credibly alleges a violation of the [Unfair Trade Practices and Consumer Protection Law], irreparable harm will be presumed.”); *United States v. Blue Ribbon Smoked Fish, Inc.*, 179 F. Supp. 2d 30, 50 (E.D.N.Y. 2001), *aff’d*, 56 F. App’x 542 (2d Cir. 2003) (“Where the government is enforcing a statute designed to protect the public interest, it is not required to show irreparable harm to obtain injunctive relief.”); *Mercury Mktg. Techs. of Delaware, Inc. v. State ex rel. Beebe*, 358 Ark. 319, 328, 189 S.W.3d 414, 420 (2004) (“we agree with the Attorney General that when he has a specific statutory mandate to protect the public interest, traditional common-law prerequisites for an injunction in civil litigation, such as irreparable harm and likelihood of success on the merits, are not applicable.”).

¹⁷ *State v. Galvin*, 491 P.3d 325, 333 (Alaska 2021).

frequency of Defendants' violations make it unlikely that the Defendants will have the means or ability to refund all of the consumers in a reasonable amount of time.

In addition, honest stores who compete in the market with the Defendants will struggle to compete. It will never be possible to adequately measure and remedy this ongoing damage.

Finally, the State's reputation will suffer if cruise ships, tour guides, and others are left with the task of warning tourists about the Defendant's products and telling these visitors that the State will be powerless to stop this continuing violation until a trial takes place two or three years from now. Only preliminary relief can adequately address this damage.

2. The opposing party will be adequately protected.

A defendant is adequately protected if they "can be indemnified by a bond when financial harm is at stake; can be otherwise protected by some action; or, at a minimum, is facing only 'relatively slight' harm compared to the potential harm facing the party seeking relief."¹⁸

In this case, the State's proposed relief will only require the Defendants use accurate labels, that they stop making false statements to customers. Any honest business would already be complying by using accurate signs, labels, and assertions. And any honest business would be perfectly capable of explaining its basis for believing that products it sells are made from natural materials sourced in Alaska.

¹⁸ *Id.*

Thus, to the extent that the TRO will cause “harm” to the Defendants, it is clear that the harm would be minimal.

Further, any harm to the Defendants would be purely economic, and while the State cannot be required to post a bond,¹⁹ the State would be capable of paying any form of attorneys’ fees or other monetary relief awarded to the Defendants in the unlikely event that the State does not prevail in this case. This provides additional protection to the Defendants.

3. The State raised serious and substantial questions.

The State expects the Court to find that the State has shown a probability of success on the merits. But if the Court does not find that the State has met this burden, then the Court should easily find that the State’s evidence raises serious and substantial questions going to the merits of the case.

IV. CONCLUSION

The State’s evidence is more than sufficient to show that the Defendants engaged in a scheme to defraud consumers by falsely claiming that imitation gold quartz and gold nugget jewelry they had purchased from out-of-state suppliers contained real gold quartz and gold nuggets that they had sourced from Alaska and manufactured into jewelry. In addition, the Defendants further defrauded consumers by making various

¹⁹ See AS 09.68.040(a) (“In an action or proceeding in a court in which the state or a municipality is a party or in which the state or a municipality is interested, a bond or undertaking is not required of the state, a municipality, or an officer of the state or municipality.”)

misrepresentations to close sales, chiefly that Alaska gold quartz cannot be purchased outside of Alaska.

The State is entitled to preliminary relief under both the balance of hardships standard and the probability of success on the merits standard. Thus, the Court should issue a temporary restraining order to protect the public until a preliminary injunction hearing can be held.

DATED May 23, 2024.

TREG TAYLOR
ATTORNEY GENERAL

By: /s/ Ian Engelbeck
Ian Engelbeck
Assistant Attorney General
Alaska Bar No. 2010094