IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA	)	
	)	
and	)	
	)	
STATE OF WISCONSIN,	)	
	)	
Plaintiffs,	)	Case No. 4:22-cv-01243
v.	)	
	)	
CONSUMER LAW PROTECTION, LLC, ET AL,	)	
	)	
	)	
	)	
Defendants.	)	

VARIOUS DEFENDANTS'
MOTION TO DISMISS PLAINTIFFS' COMPLAINT

COME NOW Defendants Christopher Carroll, Eduardo Balderas, Premier Reservations Group, LLC, Resort Transfer Group, LLC, Square One Development Group, Inc., Square One Group, LLC, Timeshare Help Source, Consumer Law Protection, LLC, Consumer Rights Council, Farmington Allegiance, LLC, Mainline Partners, LLC, and the Jake and Avery Irrevocable Trust (collectively, "Defendants"), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 9(b), 12(b)(2) and 12(b)(6), and hereby move to dismiss the Complaint in this matter. The reasons that dismissal of the Complaint is proper are detailed in Defendants' Memorandum in Support, which is being filed contemporaneously herewith and is incorporated by reference herein.

WHEREFORE, for the reasons stated in Defendants' Memorandum in Support, Defendants respectfully request this Court enter an Order dismissing the Complaint.

Dated: February 8, 2023 Respectfully submitted,

DOWD BENNETT LLP

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CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2023 the foregoing was filed with the Clerk of the Court through the Court's electronic case filing system, which by operation will serve notice of such filing upon all counsel of record.

/s/ James G. Martin