

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION**

UNITED STATES OF AMERICA)
)
 Plaintiff,)
)
 v.)
)
 MD2U HOLDING COMPANY;)
)
 MD2U, PLLC;)
)
 MD2U KENTUCKY, LLC;)
)
 MD2U INDIANA, LLC;)
)
 MD2U FLORIDA, LLC;)
)
 MD2U OHIO, LLC;)
)
 MD2U LOUISIANA, LLC;)
)
 MD2U NORTH CAROLINA, LLC;)
)
 MD2U TENNESSEE, LLC;)
)
 MD2U WEST VIRGINIA, LLC;)
)
 MD2U MANAGEMENT, LLC;)
)
 MD2U FRANCHISING, LLC;)
)
 MD2U IAH, LLC;)
)
 J. MICHAEL BENFIELD, M.D.;)
)
 GREG LATTA; AND)
)
 KAREN LATTA)
)
 Defendants.)
 _____)

Civil Action No. _____

CONSENT JUDGMENT

For the purposes of resolving all claims raised in the Complaint filed in the above-captioned action, and upon the consent of the Plaintiff, the United States of America, the Defendants: MD2U Indiana, LLC; MD2U, PLLC; MD2U Florida, LLC; MD2U Kentucky, LLC; MD2U Ohio, LLC; MD2U Louisiana, LLC; MD2U North Carolina, LLC; MD2U Tennessee, LLC; MD2U West Virginia, LLC; MD2U Management, LLC; MD2U Franchising, LLC; MD2U IAH, LLC; and MD2U Holding Company (collectively the “Corporate Defendants”), and Defendants J. Michael Benfield, Greg Latta, and Karen Latta (collectively the “Individual Defendants”), the Plaintiff, Corporate Defendants, and Individual Defendants (collectively the “Parties”), hereby state as follows:

A. The Court has jurisdiction 28 U.S.C. § 1331.

B. The Parties enter into this Consent Judgment freely and voluntarily; the Corporate Defendants and the Individual Defendants agree and promise that they shall not seek to rescind this Consent Judgment on the grounds of coercion, duress, mistake, or any other basis after execution of this Consent Judgment.

C. The Parties have the legal authority to enter into this Consent Judgment, and each Party has authorized its undersigned representative to execute this Consent Judgment on its behalf.

NOW THEREFORE, based on the agreements of the Parties, by their undersigned representatives, it is hereby **ORDERED, ADJUGED AND DECREED** as follows:

1. The Plaintiff, the United States of America, is awarded judgment in the sum of TWENTY-ONE MILLION FIVE HUNDRED ELEVEN THOUSAND SEVEN HUNDRED FIFTY SIX DOLLARS (\$21,511,756) as against the Defendants, who shall