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Executive Council of Iowa

CAPITOL BUILDING
DES MOINES, IOWA 50319
PHONE: 515 281-5368
FAX: 515 281-7562

September 8, 2026

Mr. Steven Blankinship
Chief Deputy Attorney General
Attorney General's Office
Hoover Bldg.
LOCAL

Dear Mr. Blankinship,

The Executive Council, in a meeting held this date, approved your requests for retention of special counsel pursuant to Iowa Code section 13.7 to provide legal services and representation to Iowa with respect to investigations into and possible litigation of certain business practices of: (1) TP-Link Systems Inc. (and any affiliates), (2) Resideo Technologies, Inc. (and any affiliates), and (3) Lorex Corporation (and any affiliates).

Firm: Culper Law PLLC
111 W. Marshall Ave.
Phoenix, AZ 85013

Rate: Contingent-fee; 2% discount will be applied to any fee owed based on section 23B.

EXECUTIVE COUNCIL OF IOWA

Kristi Onstot

Kristi Onstot
Executive Secretary

BRENNA BIRD
ATTORNEY GENERAL

STEVE BLANKINSHIP
CHIEF DEPUTY ATTORNEY GENERAL



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IOWA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

September 2, 2026

Kristi Onstot
Executive Secretary
Executive Council
State Capitol
LOCAL

Re: Retention of Special Counsel

Dear Ms. Onstot:

Our office requests authorization under Iowa Code section 13.7 to retain the law firm of Culper Law PLLC, as special counsel. Special counsel will provide legal services and representation to Iowa with respect to investigations into and possible litigation of certain business practices of: (1) TP-Link Systems Inc. (and any affiliates), (2) Resideo Technologies, Inc. (and any affiliates), and (3) Lorex Corporation (and any affiliates). The investigations and possible litigation will involve each company's potential negligent, unfair, deceptive, or otherwise unlawful provision of products and services, including but not limited to consumer deception about security vulnerabilities and data privacy issues. We also recommend under Iowa Code section 23B that the firm be retained on a contingent-fee basis, provided a 2% discount will be applied to any fee owed that is based on section 23B.

The Attorney General has determined that it is necessary and appropriate to retain private special counsel to assist her office in the investigations of and potential litigation against TP-Link, Resideo, and Lorex for these reasons:

- The investigation and potential litigation will involve complex claims.
- Extensive resources will be required, as any potential litigation could be time- and labor-intensive.
- Potential litigation may include, but is not limited to extensive motion practice, including on complex constitutional questions,

federal preemption issues, and other issues of first impression; extensive, time-consuming discovery of multiple corporate entities (including international entities), including numerous depositions, and potentially extensive motion practice to ensure compliance with the state's discovery requests; identifying experts and then potential expert reports, responses, and discovery.

- The anticipated complexity of any cases arising from these investigations requires counsel with a full range of trial- and appellate-level experience litigating complex matters involving both state and federal law.

We recommend Culper Law PLLC because of its partners' experience litigating complex cases across a range of subject areas, including consumer protection issues relevant to the investigations and potential litigation here. Culper Law PLLC has advocates with a depth of experience in high-stake and consumer-protection litigation, which the State needs in these investigations and any resulting litigation.

Our office has determined that this proposed contingent representation is both cost effective and in the public interest. And we have determined that a procurement process is not feasible under these unique circumstances. We therefore recommend approval of the law firm Culper Law PLLC, as special counsel. The engagement will be governed by a separate contingent fee agreement under Iowa Code section 23B.3, that will reflect the 2% discount described above.

Yours truly,

A handwritten signature in black ink, appearing to read "S. Blankinship", written over a horizontal line.

Steve Blankinship
Chief Deputy Attorney General