

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA <i>ex rel.</i>	)	
THE TARBELL GROUP, LLC,	)	
	)	
Plaintiffs,	)	No. 1:24-cv-849-LMB
	)	
v.	)	
	)	
Cheers, <i>et al.</i> ,	)	FILED <i>EX PARTE</i>
	)	
Defendants.	)	
_____	)	

STIPULATION OF DISMISSAL

A. Pursuant to Fed. R. Civ. P. 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the March 17, 2025 Settlement Agreement among the United States, Defendant Southampton Recreation Association (SRA), and Relator The Tarbell Group, LLC (the “March 17, 2025 Settlement Agreement”), the United States and Relator hereby stipulate to the entry of an order:

As to Defendant SRA:

- (1) dismissing this action as against SRA with prejudice to the United States and the Relator with respect to the covered conduct set forth in the March 17, 2025 Settlement Agreement; and
- (2) providing that the Court retain jurisdiction over any disputes that may arise regarding the March 19, 2025 Settlement Agreement.

B. Pursuant to Fed. R. Civ. P. 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the March 19, 2025 Settlement Agreement among the United States, Defendant The Metropolitan Business League (MBL), and Relator The Tarbell Group, LLC (the “March 19, 2025 Settlement

Agreement”), the United States and Relator hereby stipulate to the entry of an order:

As to Defendant MBL:

- (3) dismissing this action as against MBL with prejudice to the United States and the Relator with respect to the covered conduct set forth in the March 19, 2025 Settlement Agreement; and
- (4) providing that the Court retain jurisdiction over any disputes that may arise regarding the March 19, 2025 Settlement Agreement.

At the time of filing this Joint Stipulation of Dismissal, the United States and Relator are filing a Notice of Intervention as to Defendants SRA and MBL.

A proposed Order is attached.

Respectfully submitted,

Dated: March 28, 2025

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By:

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