

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT

Case Type: Civil Other
(Consumer Protection)

State of Minnesota, by its Attorney General,
Keith Ellison,

Court File No. 62-CV-25-382

Plaintiff,

CONSENT JUDGMENT

vs.

Venture Concepts Group LLC dba High Light
Vape Co., Amnon Arama, and My PM USA,
Inc.,

Defendants.

WHEREAS, this consent judgment is entered into between the State of Minnesota, through its Attorney General, Keith Ellison (“the Attorney General”), and Defendants Venture Concepts Group LLC dba High Light Vape Co. (“High Light Vape”), Amnon Arama (“Mr. Arama”), and My PM USA, Inc. (“My PM USA”) (together, “Defendants”);

WHEREAS, the Attorney General is authorized under Minnesota Statutes chapter 8 and common law authority, including *parens patriae* authority, to enforce Minnesota’s laws, vindicate the State’s sovereign and quasi-sovereign interests, and remediate all harm arising out of—and provide full relief for—violations of Minnesota’s laws;

WHEREAS, High Light Vape is a limited liability company organized under the laws of Florida and with a principal place of business at 4101 Ravenswood Road 405, Fort Lauderdale, Florida 33312. High Light Vape was formed in October 2022 and dissolved on August 28, 2024, though it “continues its corporate existence” for purposes of winding up its business;

WHEREAS, Mr. Arama is one of two controlling managers of High Light Vape. His business address is 4101 Ravenswood Road 405, Fort Lauderdale, Florida 33312. He resides in Fort Lauderdale, Florida.

WHEREAS, My PM USA is a corporation organized under the laws of Florida with a principal place of business at 3389 Sheridan Street, Unit 170, Hollywood, FL 33021;

WHEREAS, the Attorney General filed a complaint in this action on January 15, 2025, alleging that Defendants engaged in an unlawful scheme to market and sell addictive vaping devices disguised as highlighters in violation of Minnesota’s prohibition on deceptive vapor products, Minn. Stat. § 325F.7821, and Minnesota’s Tobacco Product Deliver Sales statute, Minn. Stat. § 325F.781, as well as Minnesota statutes prohibiting consumer fraud, Minn. Stat. § 325F.68–.70, Minn. Stat. § 325D.43–.48;

WHEREAS, the Attorney General and Defendants desire to resolve fully this matter by entering into this consent judgment;

NOW THEREFORE, the Parties hereby agree to entry of an order with the following terms and conditions:

INJUNCTIVE RELIEF

1. Defendants—including all of High Light Vape and My PM USA’s principals, officers, directors, employees, independent contractors, affiliates, subsidiaries, and successors, as well as other persons in active concert or participation with High Light Vape and My PM USA who receive actual notice of this order—shall comply with the following permanent injunctive terms and provisions:

2. Defendants, including in conjunction with any other person or entity, are hereby enjoined from conducting business with Minnesota residents. This includes but is not limited to collecting payments from, marketing to, or selling products to Minnesota residents when located in Minnesota.

3. Defendants High Light Vape and My PM USA shall not affect any change in their form of doing business, organizational identity, organizational structure, affiliations, ownership, or management composition as a method or means of attempting to avoid the requirements of this consent judgment.

4. To ensure compliance with the above injunction, Defendants shall require consumers to identify their address (including their state) before completing a sale. Defendants shall also state in clear and conspicuous language within all of their marketing, including internet marketing, that their products are not available for sale to Minnesota residents located in Minnesota.

STAYED CIVIL PENALTY

5. Defendants represent and warrant that Defendants are insolvent and that High Light Vape is no longer a going concern. The State relies on this representation and warranty in stipulating to this consent judgment.

6. Defendants shall be jointly and severally liable to pay a stayed civil penalty of \$50,000 to the Minnesota Attorney General upon application to the Court, with an opportunity for Defendants to respond to such application, and a finding by the Court that a Defendant violated a material term of this consent judgment.

GENERAL TERMS

7. Nothing in this consent judgment shall relieve Defendants of their obligation to comply with all applicable Minnesota and federal laws and regulations.

8. This consent judgment shall not be considered an admission of a violation.

9. This consent judgment may be executed in counterparts, each of which constitutes an original, and all of which shall constitute one and the same agreement. This consent judgment may be executed by facsimile or electronic copy in any image format.

10. The person signing this consent judgment for High Light Vape and My PM USA warrant that those Defendants authorized the person to execute this consent judgment and that he or she executes this consent judgment in an official capacity that binds those Defendants and their subsidiaries and successors.

11. This consent judgment constitutes the full and complete terms of the agreement entered into by Defendants and the Attorney General.

12. The parties agree that this consent judgment, including any issues related to interpretation or enforcement, shall be governed by the laws of the State of Minnesota.

13. The Ramsey County District Court shall retain jurisdiction of this matter for purposes of enforcing this consent judgment. The Attorney General may make such application as appropriate to enforce or interpret the provisions of this consent judgment or, in the alternative, maintain any action within his legal authority for such other and further relief as he determines is proper and necessary for the enforcement of this consent judgment. The parties agree that, in any action brought by the Attorney General to enforce the terms of this consent judgment, the Court shall have the authority to award equitable relief, including specific performance.

14. The failure of a party to exercise any rights under this consent judgment shall not be deemed to be a waiver of any right or any future rights.

15. Nothing in this consent judgment shall be construed to limit the power or authority of the State of Minnesota or the Attorney General except as expressly set forth herein.

16. Defendants agree that the stayed civil penalty provided under paragraph 5 above, if imposed by any court, represents a civil penalty owed to the State of Minnesota, is not compensation for actual pecuniary loss, and, therefore, is not subject to discharge under the Bankruptcy Code pursuant to 11 U.S.C. § 523(a)(7).

17. Defendants understand that if a Court of competent jurisdiction holds that a Defendant or Defendants have committed a violation of this consent judgment, that such violation may subject Defendants to sanctions for contempt and that the Attorney General may thereafter, in his sole discretion, initiate legal proceedings against Defendants for any and all violations of this consent judgment.

18. Each party shall perform such further acts and execute and deliver such further documents as may reasonably be necessary to carry out this consent judgment.

19. Defendants High Light Vape and My PM USA shall notify their principals, officers, directors, agents, employees, affiliates, subsidiaries, and successors, and any other person in active concert or participation with the company of the obligations, duties, and responsibilities imposed on them by this consent judgment.

20. Defendants shall not state or imply, directly or indirectly, that the State of Minnesota or the Attorney General have approved of, condoned, or agree with any conduct or actions by Defendants.

21. Defendants agree that the Attorney General, without further notice to Defendants, may file this consent judgment with the Ramsey County District Court on an *ex parte* basis, and that the Court may issue the Order below without further proceedings.

22. Service of notices required by this consent judgment shall be served on the following persons, or any person subsequently designated by the consent judgment to receive such notices:

Adam Welle, Assistant Attorney General
Office of the Minnesota Attorney General
445 Minnesota Street, Suite 1200
St. Paul, Minnesota 55101

Amnon Arama
5383 SW 33rd Ave
Ft. Lauderdale, FL 33312

High Light Vape
5383 SW 33rd Ave
Ft. Lauderdale, FL 33312

My PM USA
Yuval Arama
3389 Sheridan St., Unit 170
Hollywood, FL 33021

23. On or before executing this consent judgment, High Light Vape and My PM USA shall provide the Attorney General with their taxpayer identification numbers (TIN). Defendants understand that they may be subject to a penalty if they fail to provide the Attorney General with its TIN pursuant to 26 C.F.R. 6723, 26 C.F.R. 6724(d)(3), and 26 C.F.R. 301.6723-1. Defendants shall also cooperate in the Attorney General's Office's completion of Internal Revenue Service Form 1098-F by providing the Attorney General by December 31, 2025, any additional necessary information requested by the Attorney General's Office.

20. Defendants shall not state or imply, directly or indirectly, that the State of Minnesota or the Attorney General have approved of, condone, or agree with any conduct or actions by Defendants.

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Adam Welle, Assistant Attorney General
Office of the Minnesota Attorney General
445 Minnesota Street, Suite 1200
St. Paul, Minnesota 55101

High Light Vape
[Contact information]

My PM USA
[Contact information]

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Date: April 2, 2025

By: /s/ Adam Welle

Adam Welle
Assistant Attorney General, State of Minnesota

Date: FEB 25, 2025

By: Amnon Arama

[NAME]

High Light Vape

Date: FEB 24, 2025

By: Yusuf Arama

[NAME]

My PM USA, Inc.

Date: FEB 24, 2025

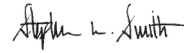
By: Yusuf Arama

Yusuf Arama

ORDER

Having reviewed the terms of the foregoing consent judgment, which is incorporated by reference, and which the Court finds reasonable and appropriate, it is SO ORDERED.

Date: _____



Smith, Stephen (Judge)
Apr 7, 2025 8:29 PM

JUDGE OF DISTRICT COURT

THERE BEING NO CAUSE FOR FURTHER DELAY, LET JUDGMENT BE ENTERED IMMEDIATELY.

