OFFICE OF ATTORNEY GENERAL
SOLE SOURCE PROCUREMENT JUSTIFICATION FORM

In accordance with the **Administrative Manual Policy, "Procurement of Services", Section VII. Sole Source Procurement of Services**, this form must be completed and submitted for approval prior to submitting an SRM shopping cart. At least one of the conditions listed below must exist to authorize sole source procurement. A copy of the signed, approved Sole Source Procurement Justification Form must be attached to the SRM shopping cart.

Requesting Office	Pennsylvania Office of Attorney General ("OAG")		
Vendor Name	Rust Consulting Inc.	**SAP Vendor No**	0000354963
Brief Description of Service	Administration of restitution funds to consumers		
Estimated Amount	**$700,000**		
Requesting Office Approval	OAG's Bureau of Consumer Protection	**Date**	**11/10/2026**
Director of HR & Office Services		**Date**	**11/10/2026**
Operations Review		**Date**	11/12/2026

Please check all that apply:
(Note: The sole source request is required to be posted on the OAG website for public inspection and comment for 10 calendar days if any of the bolded categories below are selected.)

The service is only available, or must be obtained from a single contractor.

☐ **A Federal or State statute or Federal Regulation exempts the service from the competitive procedure.**

☐ **It is clearly not feasible to award the contract for services on a competitive basis.**

☐ The services are to be provided by attorneys or litigation consultants.

☐ The services are to be provided by expert witnesses.

☐ The services involve the repair, modification or calibration of equipment and they are to be performed by the manufacturer of the equipment or by the manufacturer's authorized dealer, provided the contracting officer determines that bidding is not appropriate under the circumstances.

X **The contract for services is in the best interest of the Commonwealth.**

Justification:

The Pennsylvania Office of Attorney General ("PA OAG") is part of a Multistate Working Group ("MWG") which has been engaged in the investigation of the business practices of Acima Digital, LLC and Acima Holdings, LLC ("Acima") regarding Acima's sale and servicing of rental-purchase

agreements. The PA OAG is a lead state on the MWG Executive Committee, comprised of 9 of the 43 states participating in the MWG. Acima has entered into a multistate settlement in the form of a consent judgment, which was filed in the Allegheny County Court of Common Pleas on November 12, 2026. The consent judgment provides that restitution paid by Acima shall be distributed to affected consumers at the discretion of the MWG Executive Committee. The consent petition orders the Executive Committee to select a settlement administrator to disburse the restitution funds. The Executive Committee has selected Rust Consulting Inc. ("Rust") to be the administrator of the settlement agreement. The Executive Committee selected Rust on the basis of numerous factors. Specifically, Rust has extensive experience working as the settlement administrator on large-scale multistate settlements. Accordingly, many states on the Executive Committee (including the PA OAG) have a long-standing relationship with Rust and therefore have a high degree of confidence that Rust can administrator the funds effectively and efficiently. In particular, many MWG states will require that uncashed checks escheat to the recipients and will require that the settlement administrator handle the escheatment. Rust's knowledge on the escheatment process and capability to handle that process is far superior to that of any other settlement administrator. Rust's rate for services provided is also highly competitive, particularly given their superior knowledge of escheatment. Finally, it is imperative that the Executive Committee engage a settlement administrator as soon as possible. Under the terms of the consent judgment, the restitution funds are to be paid to a trust account for the settlement administrator within 30 days of the Effective Date (or December 12, 2026).