

October 7, 2026

Jillian Andrews, Esq.
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Re: Response to Mansour “Cease and Desist” Letter

Dear Jillian:

We write on behalf of Elijah Norton and his authorized campaign committee, Friends of Elijah Norton, in response to your letter of October 2, 2026, which demanded on behalf of Nick Mansour the suppression of information concerning Mr. Mansour’s troubled record of failed leadership in multiple private sector businesses.

Mr. Norton and his campaign will not retract or modify any of the statements identified in your letter for the simple reason that they are objectively true. We address each of them in turn:

A. Medicare Fraud Investigation

As you acknowledged, Mr. Mansour undeniably was an executive officer at Pacific Pulmonary Services (“PPS”), which paid the U.S. Department of Justice more than \$11 million to resolve claims that it had defrauded Medicare and other taxpayer-funded healthcare programs. You state that Mr. Mansour “was never a party to the proceeding your campaign cites,” that he “did not control” the company, and that he had departed the company in June 2008, “months before the events giving rise to a whistleblower complaint.”

These protestations, however, are not responsive to the truthful representations contained in Mr. Norton’s campaign communications. First, the mailer, video, and website you cited all consistently and expressly disclosed that the *company* was the respondent in the proceedings; none claimed that Mr. Mansour was personally a party. Second, Mr. Mansour undisputedly was the Executive Vice President of Business Development, a division of the company that apparently was at the epicenter of the illegal sales practices that precipitated the DOJ’s investigation. Finally, your assertion that PPS’s unlawful conduct post-dated Mr. Mansour’s tenure finds direct contradiction in the DOJ press release announcing the settlement (as well as the underlying settlement agreement itself), which recounts that the relevant acts and occurrences spanned from 2004 until 2011, which overlaps with Mr. Mansour’s tenure at the company. Although Mr. Mansour seems to be prevaricating about his time at PPS—your letter says he was employed there “for less than one year,” but prior versions of Mr. Mansour’s LinkedIn page boasted that he worked there for approximately two years, from 2007 until 2009—he clearly presided in a key leadership role during a period when the company allegedly engaged in serious wrongdoing. See U.S. Dept. of Justice, *Oxygen Equipment Provider Pays \$11.4 Million to Resolve False Claims Act Allegations*, Apr. 25, 2017, available at <https://www.justice.gov/archives/>

[opa/pr/oxygen-equipment-provider-pays-114-million-resolve-false-claims-act-allegations](#). It also merits mention that the Complaint flagged questionable “sales contests devised by Jason Anderson, Vice President of Sales,” which included giving out Rolexes and paying mortgages. Compl. ¶ 78, *United States v. Braden Partners, LP, et al.*, 4:10-cv-04597-PJH (N.D. Cal. Oct. 12, 2010). Interestingly, that same Mr. Anderson later succeeded Mr. Mansour as the Chief Executive Officer of the Arizona College of Nursing.

As it happens, Mr. Norton first learned of Mr. Mansour’s dubious history at PPS from none other than Mr. Mansour’s campaign—in the form of survey questions that probed respondents’ reactions to the proposition that “Nick Mansour helped run a company that paid out over \$11 million in fines after being sued for a kickback scheme to sell C-PAPs and sleep therapy equipment to vulnerable patients.” If this messaging is not an acknowledgement of that proposition’s veracity, it certainly undermines the notion that Mr. Mansour was somehow damaged by the Norton campaign’s reiteration of the same allegations that Mr. Mansour was himself disseminating.

B. Mismanagement of Arizona College of Nursing

1. Texas Lawsuit

Your insistences that Mr. Mansour was not *personally* “sued over missing COVID relief funds” and did not “pocket” such monies vanquish a strawman. The mailer you cited reports that “More than 20 nursing students sued Nick Mansour’s *company*,” and the video similarly contains this on-screen caption: “Nick Mansour’s *School* Sued for Pocketing Tax Dollars” (emphases added). These statements are inarguably true. Numerous students sued Arizona College of Nursing (“AZCN”), of which Mr. Mansour was the Chief Executive Officer at all times relevant, for “misappropriat[ing] [COVID] funds and fail[ing] to distribute the funds to the students directly.” Compl. ¶¶ 13–14, *Caine v. Eduvision, Inc.*, No. 3:22-cv-01713-S (N.D. Tex. Aug. 18, 2023).

Although the docket indicates that the dispute was referred to arbitration, there is no publicly available evidence that AZCN ever secured a formal disposition of the plaintiffs’ factual allegations in its favor. Indeed, when the *Arizona Republic* asked Mr. Mansour about the litigation, he deflected and professed ignorance of the lawsuit. See Mary Jo Pitzl, *Democrat Nick Mansour Throws Hat in Ring*, ARIZ. REPUBLIC, Jun. 18, 2025. The Norton campaign’s good faith reliance on public records filed in a federal court proceeding immunize its reporting from defamation liability. See *Sallomi v. Phoenix Newspapers, Inc.*, 160 Ariz. 144, 147 (App. 1989) (applying “public records” privilege to statements that “were a fair and accurate abridgement of the public records used”).

2. Loan Default Rate

Next, your assertion that the loan default rate among AZCN students is 2.6% (rather than 21%) relies on a conspicuous curating of dates to highlight only the period from 2018 until 2021. That time span, of course, coincides largely with the COVID-era moratorium on repayments of federally backed student loans, which temporarily obscured the financial burdens confronting deeply indebted students. Sensibly excluding the moratorium’s distortive effect, the *Milwaukee Journal Sentinel* reported that “[t]he three-year student loan default for the Arizona College of Nursing’s Tempe location was 21% as of fiscal year 2019,” when Mr. Mansour was at the school’s helm. Cleo Krejci, *Arizona College of Nursing, a For-Profit School, Plans to Open Campuses in Milwaukee and Madison*, MILWAUKEE JOURNAL SENTINEL, Jan. 5, 2024. Mr. Mansour has proffered nothing to rebut this credible journalistic source.

3. “Scam” Allegation

Finally, Mr. Mansour grouses about Mr. Norton’s characterization of AZCN’s operations under Mr. Mansour’s leadership as a “scam.” But this normative conclusion, especially when premised on disclosed and accurate facts, is not actionable. See *Luxury Auto Collection, LLC v. Walker*, 2022 WL 17361292, at *5 (D. Ariz. Jul. 6, 2022) (deeming similar appellations to be expressions of opinion and not fact); see also *Harris v. Warner in and for Cnty. of Maricopa*, 255 Ariz. 29, 35 ¶ 24 (2023) (“Under the First Amendment, apparently factual statements must be considered in light of the nature in which the speaker uttered them and the relationship of the statements to the overall context.”). More to the point, the countless AZCN students who, because of Mr. Mansour’s mismanagement, were denied critical clinical experience,¹ deprived of misdirected federal relief dollars, or deceived into incurring debt they could not realistically repay undoubtedly concur in Mr. Norton’s assessment.

In any event, Mr. Mansour’s invitation to further scrutiny of his checkered career history is perplexing, but in the unlikely event that the defamation lawsuit to which your letter alludes survives a motion to dismiss under Rule 12(b)(6) and/or and the Arizona Anti-SLAPP Act, A.R.S. § 12-751, Mr. Norton believes that Arizona voters would be well-served by robust discovery into Mr. Mansour’s entanglements in his companies’ long litany of legal travails.

* * *

Given Mr. Mansour’s paeans to truthfulness and honesty, it evinces a curious combination of oblivious irony and rank hypocrisy that he is smearing – and has been smearing for over a year – Mr. Norton’s character and businesses with numerous unfounded attacks. Most notably, he has repeated on two occasions the lie that one of Mr. Norton’s companies “went bankrupt.”² No business entity that Mr. Norton owns, operates, or manages is, or ever was, in bankruptcy. To the best of Mr. Norton’s knowledge, none of his prior enterprises have ever declared bankruptcy following his sale of them. To the contrary, Mr. Norton’s businesses, Veritas and Azura Insurance Corporation, together with their affiliated companies, serve over five million customers, and are one of the largest F&I insurance organizations globally, with operations in the United States, Canada, Chile, the European Union, and South Africa. The company has an “A+” rating with the Better Business Bureau and has paid out more than one million claims for its customers’ benefit. Further, Mr. Mansour continues to paint Veritas and other affiliated businesses in a false light, by stating that the companies have been “sued 100 times” and have “hundreds” of complaints filed against them – while at the same time failing to disclose that these disputes represent approximately 0.002% of the companies’ customer base.³ If Mr. Mansour would like more information about Mr. Norton’s business successes—either to correct the public record or for Mr. Mansour’s own professional edification—Mr. Norton would be happy to oblige.

¹ See Consent Agreement, *In re Arizona College BSN Program*, Ariz. Bd. of Nursing Order No. 210504RN96500100, ¶ 3(A).

² See <https://www.youtube.com/watch?v=fjx0cm8jffHQ> (at 9:04); <https://www.youtube.com/watch?v=K9lZiqT0GAA> (at 8:54).

³ Contrary to Mr. Mansour’s misrepresentations, the companies do not sell or market directly to consumers; they provide their services only to other *businesses* (i.e., agencies and dealers).

Accordingly, if Mr. Mansour makes the improvident decision to chase the “legal remedies” referenced in your letter, he would be well-advised to keep in mind that Mr. Norton has been⁴ and will continue to be unyielding in pursuing remedies of his own when he believes that his character or businesses have been unfairly maligned.

Respectfully,

/s/ Kory Langhofer
Kory Langhofer

/s/ Thomas Basile
Thomas Basile

⁴ See, e.g., *Norton v. Friends of David Schweikert*, Maricopa County Superior Court No. CV2023-002867; *CarGuard Administration, Inc.*, Maricopa County Superior Court No. CV2022-006767; *CarGuard Administration, Inc. v. Schweikert*, Maricopa County Superior Court No. CV2022-008736; *Hammon v. Schweikert*, Maricopa County Superior Court No. CV2022-008814; *Photography by Frank Diaz LLC v. Friends of David Schweikert*, No. CV-22-01170 (D. Ariz.).