

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

Federal Trade Commission,

Plaintiff,

vs.

Apply Knowledge, LLC, et al.,

Defendants.

Case No. 2:14-cv-00088 (DB)

**STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY
JUDGMENT AS TO DEFENDANTS DAHM INTERNATIONAL, LLC; DOMINION
OF VIRGO INVESTMENTS, INC.; ESSENT MEDIA, LLC; EVI, LLC; NEMROW
CONSULTING, LLC; NOVUS NORTH, LLC; PURPLE BUFFALO, LLC;
365DAILYFIT, LLC; VENSURE INTERNATIONAL, LLC; JESSICA BJARNSON;
PHILLIP EDWARD GANNUSCIA II; RICHARD SCOTT NEMROW; JEFFREY
NICOL; and THOMAS J. RISKAS III**

Plaintiff, Federal Trade Commission (“Commission” or “FTC”), filed its Amended Complaint for Permanent Injunction and Other Equitable Relief (Dkt. No. 216) (“Complaint”) in this matter pursuant to Sections 13(b) and 19 of the Federal Trade Commission (“FTC Act”), 15 U.S.C. §§ 53(b) and 57b, and the Telemarketing and Consumer Fraud Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108. The Commission and Dahm International LLC; Dominion of Virgo Investments, Inc.; Essent Media LLC, EVI LLC (d/b/a Members Learning Center); Nemrow Consulting LLC; Novus North LLC (d/b/a MyMentoring, Yes International LLC, and Your eCommerce Support International LLC); Purple Buffalo LLC (d/b/a NetMarketing); 365DailyFit LLC (d/b/a Net Training); Vensure International LLC; Jessica Bjarnson; Phillip Edward Gannuscia, II; Richard Scott Nemrow; Jeffrey Nicol; and Thomas J. Riskas, III (“Essent Defendants or Defendants”) hereby stipulate to the entry of this Stipulated

Order for Permanent Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action between them.

FINDINGS

1. This Court has jurisdiction over the subject matter.
2. The Complaint charges that Defendants participated in deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), the Telemarketing and Consumer Fraud and Abuse Prevention Act, 15 U.S.C. §§ 6101-6108, and the Telemarketing Sales Rule, 16 C.F.R. Part 310, in the marketing of business coaching services to consumers throughout the United States.
3. The Essent Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.
4. The Essent Defendants waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to bear their own costs and attorney fees.
5. The Essent Defendants waive and release any claims that they may have against the Commission and its respective agents that relate to this action.
6. The Essent Defendants and the Commission waive all rights to appeal or otherwise challenge or contest the validity of this Order.

ORDER

DEFINITIONS

For the purpose of this Order, the following definitions shall apply:

1. **“Acquirer”** or **“Acquiring Bank”** means a business organization, Financial Institution, or an agent of a business organization or Financial Institution that has authority from an organization that operates or licenses a credit card system (*e.g.*, Visa, MasterCard, American Express, or Discover) to authorize merchants to accept, transmit, or process payment by credit card through the credit card system for money, goods or services, or anything else of value.
2. **“Add-on Services”** means any additional product offered to a consumer who has purchased a product.
3. **“Assisting Others”** means providing assistance or support to any Person, including providing any of the following services: (a) performing customer service functions, including receiving or responding to consumer complaints; (b) formulating or providing, or arranging for the formulation or provision of, any sales script or other promotional material; (c) providing names of, or assisting in the generation of, potential customers; (d) verifying, processing, fulfilling, or arranging for the fulfillment of orders; (e) hiring, recruiting, or training personnel; (f) performing promotional or marketing services of any kind; or (g) processing or arranging for processing of credit cards, debit cards, Automated Clearinghouse (“ACH”) debits, remotely-created checks, or payments through any other system.
4. **“Business Coaching Program”** means any program, plan, or product, including those related to work-at-home-opportunities, that is represented, expressly or by implication, to train or teach a participant or purchaser how to establish a business or earn money or other consideration through a business or other activity.
5. **“Credit Card Laundering”** means: (a) presenting or depositing into, or causing or allowing another to present or deposit into, the credit card system for payment, a Credit Card Sales Draft generated by a transaction that is not the result of a credit card transaction between

the cardholder and the Merchant; (b) employing, soliciting, or otherwise causing or allowing a Merchant, or an employee, representative, or agent of a Merchant, to present or deposit into the credit card system for payment, a Credit Card Sales Draft generated by a transaction that is not the result of a credit card transaction between the cardholder and the Merchant; or (c) obtaining access to the credit card system through the use of a business relationship or an affiliation with a Merchant, when such access is not authorized by the Merchant Account agreement or the applicable credit card system.

6. “**Credit Card Sales Draft**” means any record or evidence of a credit card transaction.

7. “**Corporate Defendant(s)**” means Dahm International, LLC; Dominion of Virgo, Investments, Inc.; Essent Media, LLC; EVI, LLC; Nemrow Consulting, LLC; Novus North, LLC; Purple Buffalo, LLC; 365DailyFit, LLC; Vensure International, LLC; and their subsidiaries, affiliates, successors, and assigns.

8. “**Essent Defendant(s)**” means the Corporate Defendants and the Individual Defendants.

9. “**Financial Institution**” means any institution the business of which is engaging in financial activities as described in section 4(k) of the Bank Holding Company Act of 1956, 12 U.S.C. § 1843(k). An institution that is significantly engaged in financial activities is a Financial Institution.

10. “**Individual Defendant(s)**” means Jessica Bjarnson, Phillip Edward Gannuscia II, Richard Scott Nemrow, Jeffrey Nicol, and Thomas J. Riskas III.

11. “**Investment Opportunity**” means anything, tangible or intangible, that is offered, offered for sale, sold, or traded based wholly or in part on representations, either express or implied, about past, present, or future income, profit, or appreciation.

12. “**Merchant**” means a Person who is authorized under a written contract with an Acquirer

to honor or accept credit cards, or to transmit or process for payment credit card payments, for the purchase of products.

13. “**Merchant Account**” means any account with an Acquiring Bank or other Financial Institution, service provider, payment processor, independent sales organization, or other entity that enables an individual, a business, or other organization to accept payments of any kind.

14. “**Payment Processing**” means providing a Person, directly or indirectly, with the means used to charge or debit accounts through the use of any payment mechanism, including remotely created payment orders, remotely created checks, ACH debits, or debit, credit, prepaid, or stored value cards. Whether accomplished through the use of software or otherwise, payment processing includes, among other things: (a) reviewing and approving merchant applications for Payment Processing services; (b) providing the means to transmit sales transactions data from Merchants to Acquiring Banks or other Financial Institutions; (c) clearing, settling, or distributing proceeds of sales transactions from Acquiring Banks or Financial Institutions to Merchants; or (d) processing chargebacks or returned remotely created payment orders, remotely created checks, or ACH checks.

15. “**Person**” means a natural person, organization, or other legal entity, including a corporation, limited liability company, partnership, proprietorship, association, cooperative, government or governmental subdivision or agency, or any other group or combination acting as an entity.

16. “**Settled Defendant(s)**” means Apply Knowledge LLC; eVertex Solutions LLC; Supplier Source LLC; VI Education LLC; David Gregory Bevan; and Kenneth Sonnenberg.

17. “**Telemarketing**” means a plan, program, or campaign which is conducted to induce the purchase of goods or services or a charitable contribution, by use of one or more telephones and

which involves more than one interstate telephone call. Provided, however, that with regard to Defendant Nicol, Telemarketing does not include such calls made for the purpose of offering home loans to the public.

I.

**PROHIBITIONS RELATED TO THE SALE OF BUSINESS COACHING PROGRAMS
AND INVESTMENT OPPORTUNITIES**

IT IS ORDERED that each Essent Defendant is hereby permanently restrained and enjoined from:

- A. Creating, advertising, marketing, promoting, offering for sale, or selling, or Assisting Others in creating, advertising, marketing, promoting, offering for sale, or selling any Business Coaching Program or any Investment Opportunity;
- B. Creating, advertising, marketing, promoting, offering for sale, or selling, or Assisting Others in creating, advertising, marketing, promoting, offering for sale, or selling Add-on Services in connection with a Business Coaching Program or an Investment Opportunity, such as website development and hosting products, social media promotion products, search engine optimization products, and business education, training, formation, and development products;
- C. Holding, directly or through a third-Person, any ownership or other financial interest in any business entity that is creating, advertising, marketing, promoting, offering for sale, or selling, or that Assists Others in creating, advertising, marketing, promoting, offering for sale, or selling any Business Coaching Program, any Investment Opportunity, any Add-on Services, or any product to assist in the creation or development of a Business Coaching Program or an Investment Opportunity.

II.

PROHIBITION ON TELEMARKETING

IT IS FURTHER ORDERED that each Essent Defendant is hereby permanently restrained and enjoined from Telemarketing or Assisting Others in Telemarketing.

III.

PROHIBITIONS RELATED TO MERCHANT ACCOUNTS

IT IS FURTHER ORDERED that each Essent Defendant is hereby permanently restrained and enjoined from:

- A. Credit Card Laundering;
- B. Making, or Assisting Others in making, directly or by implication, any false or misleading statement in order to obtain Payment Processing services; and
- C. Engaging in any tactics to avoid fraud and risk monitoring programs established by any Financial Institution, Acquiring Bank, or the operators of any payment system, including tactics such as balancing or distributing sales transactions among multiple Merchant Accounts or merchant billing descriptors; splitting a single sales transaction into multiple smaller transactions; or using shell companies to apply for a Merchant Account.

IV.

MONETARY JUDGMENT

- A. Judgment in the amount of Nineteen Million, Two Hundred Fourteen Thousand, Nine Hundred Fifty Dollars and Forty Cents (\$19,214,950.40) is entered in favor of the Commission against the Essent Defendants, jointly and severally as equitable monetary relief.

B. The Individual Defendants are ordered to make the following payments to the FTC by electronic fund transfer in accordance with instructions to be provided by a representative of the Commission:

1. Defendants Jessica Bjarnson and Phillip Edward Gannuscia II shall, within seven (7) calendar days of entry of this Order, pay the Commission \$354,200, and within thirty (30) calendar days of entry of this Order, pay the Commission an additional \$250,000, and within sixty (60) calendar days of entry of this Order, pay the Commission an additional \$250,000 for a total payment of \$854,200.
2. Defendant Richard Scott Nemrow shall pay the Commission \$160,800 within seven (7) calendar days of entry of this Order.
3. Defendant Thomas J. Riskas III shall pay the Commission \$12,000 within seven (7) calendar days of entry of this Order.
4. Defendant Jeffrey Nicol shall pay the Commission \$2,000 within seven (7) calendar days of entry of this Order.

C. In partial satisfaction of the judgment against the Essent Defendants:

1. Bank of American Fork is ordered to transfer all funds held in account XXX [REDACTED], in the name of N.B. Real Estate Holdings LLC, to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
2. Base Commerce LLC, d/b/a Phoenix Payments, is ordered to transfer all funds held in the accounts identified on Attachment A to this Order to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.

3. Capital Community Bank is ordered to transfer all funds held in accounts XXXX[REDACTED] and XXXX3191, in the name of Essent Media LLC, to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
4. Evo Payments International, d/b/a EVO Merchant Services, LLC, is ordered to transfer all funds held in the accounts identified on Attachment B to this Order to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
5. First Data Corporation is ordered to transfer all funds held in the accounts identified on Attachment C to this Order to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
6. Global Merchant Advisors is ordered to transfer all funds held in the accounts identified on Attachment D to this Order to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
7. Global Payments Direct is ordered to transfer all funds held in account number XXXXXXXXXXXXX[REDACTED], in the name of Reveel International LLC, to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.

8. Mountain America Credit Union is ordered to transfer all funds held in the accounts identified on Attachment E to this Order to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
9. U.S. Bank is ordered to transfer all funds held in accounts XXXXXXXX [REDACTED] and XXXXXXXX [REDACTED], in the name of At Home Business LLC, to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
10. Utah Community Credit Union is ordered to transfer all funds held in the accounts identified on Attachment F to this Order to the Commission by electronic funds transfer in accordance with instructions provided by the Commission. The funds shall be transferred within seven (7) days of entry of this Order.
11. Citibank, N.A. is ordered to transfer to the Commission all funds held in the accounts identified on Attachment G to this Order and all funds in any other accounts not listed on Attachment G that are currently frozen at Citibank in connection with this case. The funds shall be transferred by electronic funds transfer, in accordance with instructions provided by the Commission, within seven (7) days of entry of this Order.

D. Upon the completion of all payments listed in subparagraphs B and C of this Section, the remainder of the judgment is suspended as to the Essent Defendants, subject to the Subsections below.

E. The Commission's agreement to this Order is expressly premised upon the promise by the Essent Defendants to make payments timely as described in Subsections B and C above. If, upon motion by the Commission, the Court finds that an Essent Defendant has defaulted on any

obligation to make a payment as required by this Order, then the judgment becomes immediately due as to that Defendant in the amount specified in Subsection A above, less any payment previously made pursuant to this Section, plus interest computed from the date of entry of this Order.

F. The Commission's agreement to the suspension of part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of the Essent Defendants' sworn financial statements and related documents (collectively, "financial representations") submitted to the Commission, namely:

1. the Financial Statement of Individual Defendant Jessica Bjarnson, dated February 2, 2018, including the attachments related to items 9, 12, 14, 19, and 23 of the Statement, the joint federal and state tax returns of Jessica Bjarnson and Phillip Edward Gannuscia II for 2015 and 2016, and all other documents that Ms. Bjarnson or Mr. Gannuscia produced to the Commission in February 2018;
2. the Financial Statement of Individual Defendant Phillip Edward Gannuscia II, dated February 8, 2018, including the attachments related to items 9, 12, 14, 19, and 23 of the Statement, the joint federal and state tax returns of Jessica Bjarnson and Phillip Edward Gannuscia II for 2015 and 2016, and all other documents that Mr. Gannuscia or Ms. Bjarnson produced to the Commission in February 2018;
3. the Financial Statement of Individual Defendant Richard Scott Nemrow, dated February 20, 2018, a divorce decree concerning Mr. Nemrow dated October 26, 2015, documents related to the ownership of a Centurion boat disclosed on Mr. Nemrow's Statement, and all other documents that Mr. Nemrow produced to the Commission in February 2018;

4. the Financial Statement of Individual Defendant Jeffrey Nicol, dated February 16, 2018, federal and state tax returns for Mr. Nicol for 2014 and 2015, and all other documents that Mr. Nicol produced to the Commission in February 2018;
5. the Financial Statement of Individual Defendant Thomas J. Riskas III, dated February 2, 2018, joint federal and state tax returns for Mr. Riskas and his wife for 2014, 2015, and 2016, and all other documents that Mr. Riskas produced to the Commission in February 2018;
6. the Financial Statement of Corporate Defendant Dahm International LLC, dated February 9, 2018;
7. the Financial Statement of Corporate Defendant Dominion of Virgo Investments, Inc., dated February 7, 2018, and attachments thereto;
8. the Financial Statement of Corporate Defendant Essent Media LLC, dated February 7, 2018, and attachments thereto;
9. the Financial Statement of Corporate Defendant EVI LLC, d/b/a Members Learning Center, dated February 12, 2018, and attachment thereto;
10. the Financial Statement of Corporate Defendant Nemrow Consulting LLC, dated February 20, 2018;
11. the Financial Statement of Corporate Defendant Novus North LLC, d/b/a MyMentoring, Yes International LLC, and Your eCommerce Support International LLC, dated February 7, 2018;
12. the Financial Statement of Corporate Defendant Purple Buffalo LLC, d/b/a/ NetMarketing, dated February 9, 2018, and attachment thereto;

13. the Financial Statement of Corporate Defendant 365DailyFit LLC, d/b/a Net Training, dated February 9, 2018; and

14. the Financial Statement of Corporate Defendant Vensure International LLC, dated February 9, 2018, and attachments thereto.

G. The suspension of the judgment will be lifted as to any Essent Defendant if, upon motion by the Commission, the Court finds that he or she failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the financial representations identified above. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Defendant in the amount specified in Subsection A above less any payment previously made pursuant to this Section, plus interest computed from the date of entry of this Order.

H. The Essent Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order, and may not seek the return of any assets. The Essent Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets of eCommerce Support LLC, and may not seek the return of any such assets, including those held in accounts XXXX [REDACTED], XXXX [REDACTED], XXXX [REDACTED], and XXXX [REDACTED] at U.S. Bank, those held in account XXXX [REDACTED] at Wells Fargo Bank, and approximately \$47,613 held in trust at Ray Quinney & Nebeker, counsel for the Essent Defendants.

I. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission, including in a proceeding to enforce their rights to any payment or monetary judgment pursuant to this Order, such as a nondischargeability complaint in any bankruptcy case.

J. The facts alleged in the Complaint establish all elements necessary to sustain an action by the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C.

§ 523(a)(2)(A), and this Order will have collateral estoppel effect for such purposes.

K. The Essent Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Numbers or Employer Identification Numbers), which the Essent Defendants previously submitted to the Commission, may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

L. All money paid to the FTC pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress, and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining funds for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to the unlawful acts or practices alleged in the Complaint. Any money not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement. The Essent Defendants have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

V.

BAN ON USE OF CUSTOMER INFORMATION

IT IS FURTHER ORDERED that the Essent Defendants and their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, are hereby permanently restrained and enjoined from:

A. Failing to provide sufficient customer information to enable the Commission, or its designee, to efficiently administer consumer redress. If a representative of the Commission requests in writing any information related to redress, the Essent Defendants must provide it, in the form prescribed by the Commission, within fourteen (14) calendar days.

B. Disclosing, using, or benefitting from customer information derived from the sale of a Business Coaching Program or an Investment Opportunity, including the name, address, telephone number, e-mail address, Social Security number, other identifying information, or any data that enables access to a consumer's account (including a credit card, bank, or other financial account), or would otherwise allow assessment of a charge against a consumer's account; and

C. Failing to dispose of customer information, in all forms, related to the sale of a Business Coaching Program or an Investment Opportunity that is in the Essent Defendants' possession, custody, or control within forty-five (45) calendar days after receipt of written direction to do so from a representative of the FTC. Disposal shall be by means that protect against unauthorized access to consumer information, such as by burning, pulverizing, or shredding any papers, and by erasing or destroying any electronic media, to ensure that consumer information cannot practicably be read or reconstructed.

Provided, however, that customer information need not be disposed of, and may be disclosed, to the extent requested by a government agency or required by a law, regulation, or court order.

VI.

ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that the Essent Defendants obtain acknowledgments of receipt of this Order:

- A. Each Essent Defendant, within seven (7) calendar days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. For five (5) years after entry of this Order, each Individual Defendant for any business that such defendant, individually or collectively with any other Essent Defendant, Settled Defendant, or eCommerce Support LLC, is the majority owner of or controls directly or indirectly, and each Corporate Defendant must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives who participate in conduct related to the subject matter of this Order; and (3) any business entity resulting from any change in structure as set forth in the Section of this Order titled Compliance Reporting. Delivery must occur within seven (7) calendar days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.
- C. From each individual or entity to which an Essent Defendant delivered a copy of this Order, that defendant must obtain, within thirty (30) calendar days, a signed and dated acknowledgment of receipt of this Order.

VII.

COMPLIANCE REPORTING

IT IS FURTHER ORDERED that the Essent Defendants make timely submissions to the Commission:

- A. One year after entry of this Order, each Essent Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Essent Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with that defendant; (b) identify all of that defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Essent Media Defendant, Settled Defendant, or eCommerce Support LLC (which each Individual Defendant must describe if that defendant knows or should know of the involvement due to that defendant's own involvement in the business); (d) describe in detail whether and how that defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.

2. Additionally, each Individual Defendant must: (a) identify all telephone numbers and all physical, postal, email and internet addresses, including all residences; (b) identify all business activities, including any business for which that defendant performs services whether as an employee or otherwise and any entity in which that defendant has any ownership interest; and (c) describe in detail that defendant's involvement in each such business, including defendant's title, role, responsibilities, participation, authority, control, and any ownership.

B. For ten (10) years after entry of this Order, each Essent Defendant must submit a compliance notice, sworn under penalty of perjury, within fourteen (14) calendar days of any change in the following:

1. Each Essent Defendant must report any change in: (a) any designated point of contact; or (b) the structure of any Corporate Defendant and any entity that any Individual Defendant has any ownership interest in or controls, directly or indirectly, that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.
 2. Additionally, each Individual Defendant must report any change in: (a) name, including aliases or fictitious name, or residence address; or (b) title or role in any business activity, including any business for which the defendant performs services whether as an employee or otherwise and any entity in which the defendant has any ownership interest, and identify the name, physical address, and any internet address of the business or entity.
- C. Each Essent Defendant must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against that defendant within fourteen (14) calendar days of its filing.
- D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: _____” and supplying the date, signatory’s full name, title (if applicable), and signature.
- E. Unless otherwise directed by a representative of the Commission in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement,

Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: *FTC v. Apply Knowledge LLC, et al—* Essent Defendants, X-14-0018.

VIII.

RECORDKEEPING

IT IS FURTHER ORDERED that each Essent Defendant must create certain records for ten (10) years after entry of this Order, and retain each such record for five (5) years. Specifically, each Essent Defendant, for any business in which that defendant, individually or collectively with any other Essent Defendant, Settled Defendant, or eCommerce Support LLC, is a majority owner or directly or indirectly controls, must create and retain the following records:

- A. Accounting records showing the revenues from all products sold, all costs incurred in generating those revenues, and the resulting net profit or loss;
- B. Personnel records showing, for each Person providing services, whether as an employee or otherwise, that Person's: name, addresses, and telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. Records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third-party, and any response;
- D. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission;
- E. Non-duplicate copies of any advertisement or other marketing material, including web pages, pop ups, email advertisements, and any audio files related to them;
- F. Records regarding ownership and control of websites used in the advertising, marketing, promotion, offering for sale, or sale of products;

- G. Records regarding contracts for the advertisement of products;
- H. Records regarding applications and contracts for Payment Processing services; and
- I. Customer files obtained after entry of this Order, including those recorded on a customer relationship management database, also known as a “CRM,” showing the names, addresses, telephone numbers, dollar amounts paid, and the quantity of products purchased, to the extent such information is obtained in the ordinary course of business.

IX.

COMPLIANCE MONITORING

IT IS FURTHER ORDERED that for the purpose of monitoring each Essent Defendant’s compliance with this Order, including the financial representations on which part of the judgment was suspended:

- A. Within fourteen (14) calendar days of receipt of a written request from a representative of the Commission, each Essent Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents, for inspection and copying. The Commission is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69;
- B. For matters concerning this Order, the Commission is authorized to communicate directly with each Essent Defendant. Each defendant must permit representatives of the Commission to interview any employee or other Person affiliated with that defendant who has agreed to such an interview. The Person interviewed may have counsel present;
- C. The Commission may use all other lawful means, including posing, through its representatives, as consumers, suppliers, or other individuals or entities, to any Essent

Defendant, or any individual or entity affiliated with an Essent Defendant, without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1; and

D. Upon written request from a representative of the Commission, any consumer reporting agency must furnish consumer reports concerning any Individual Defendant, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681(b)(1).

X.

RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

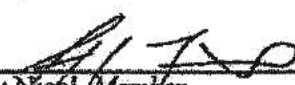
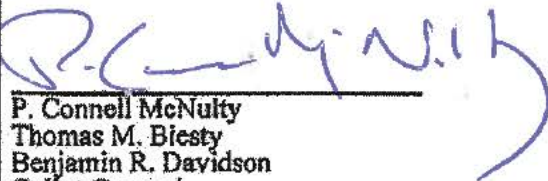
SO ORDERED, this 26th day of April, 2018.



HON. DEE BENSON
UNITED STATES DISTRICT JUDGE

[The parties' signatures follow]

IT IS SO STIPULATED AND AGREED:

<p>Defendant Dahm International, LLC</p> <p>By: <u></u> Jeffrey Niobi, <i>Member</i></p> <p>Defendant Dominion of Virgo Investments, Inc.</p> <p>By: _____ Phillip Edward Gannuscia II, <i>Director</i></p> <p>Defendant Essent Media LLC</p> <p>By: _____ Phillip Edward Gannuscia II, <i>as Director of Dominion of Virgo Investments, Inc., Member</i></p> <p style="text-align: center;"><i>AND</i></p> <p>By: _____ Richard Scott Nemrow, <i>as Owner/Member of Nemrow Consulting LLC, Member</i></p> <p>Defendant EVI LLC, d/b/a Members Learning Center</p> <p>By: _____ Thomas J. Riskas III, <i>Manager</i></p> <p>Defendant Nemrow Consulting LLC</p> <p>By: _____ Richard Scott Nemrow, <i>Owner/Member</i></p>	<p style="text-align: center;"><u></u></p> <p>P. Connell McNulty Thomas M. Biesty Benjamin R. Davidson Collet Guerard Federal Trade Commission 600 Pennsylvania Avenue, NW, CC-8528 Washington, DC 20580 202-326-2061 pmcnulty@ftc.gov 202-326-3043 tbiesty@ftc.gov 202-326-3055 bdavidson@ftc.gov 202-326-3338 eguerard@ftc.gov Fax: 202-326-3395</p> <p><i>Counsel for Plaintiff, Federal Trade Commission</i></p>
--	--

Defendant Novus North LLC, d/b/a MyMentoring, Yes International LLC, and Your eCommerce Support International LLC

By: _____
Phillip Edward Gannuscia II, *as Director of Dominion of Virgo Investments, Inc., Member*

AND

By: _____
Richard Scott Nemrow, *as Owner/Member of Nemrow Consulting LLC, Member*

Defendant Purple Buffalo LLC, d/b/a Net Marketing

By: _____
Thomas J. Riskas III, *Member*

Defendant 365DailyFit LLC, d/b/a Net Training

By: 
Jeffrey Nicol, *Member*

Defendant Vensure International LLC

By: _____
Phillip Edward Gannuscia II, *as Director of Dominion of Virgo Investments, Inc., Member*

AND

By: _____
Richard Scott Nemrow, *as Owner/Member of Nemrow Consulting LLC, Member*

Jessica Bjarnson, *Individually*

Phillip Edward Gannuscia II, Individually

Richard Scott Nemrow, Individually

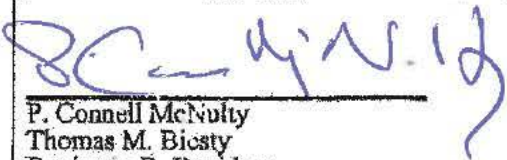

Jeffrey Nicol, Individually

Thomas J. Riskas III, Individually


Brett L. Tolman
RAY QUINNEY & NEBEKER
36 South State Street
Suite 1400
Salt Lake City, UT 84111
801-532-1500 btolman@rqn.com
Fax: 801-532-7543

Counsel for the Essent Defendants


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<p>Defendant Dahm International, LLC</p> <p>By: _____ Jeffrey Nicol, <i>Member</i></p>	
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<p>Defendant Essent Media LLC</p> <p>By: _____ Phillip Edward Gannuscia II, <i>as Director of Dominion of Virgo Investments, Inc., Member</i></p>	<p><i>Counsel for Plaintiff, Federal Trade Commission</i></p>
<p>AND</p>	
<p>By: _____ Richard Scott Nemrow, <i>as Owner/Member of Nemrow Consulting LLC, Member</i></p>	
<p>Defendant EVI LLC, d/b/a Members Learning Center</p> <p>By: _____ Thomas J. Riskas III, <i>Manager</i></p>	
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By: _____
Jeffrey Nicol, Member

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Richard Scott Nempow, Individually

Jeffrey Nicol, Individually

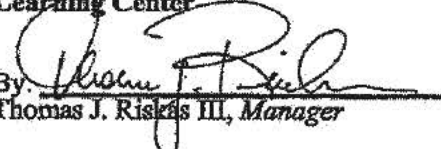
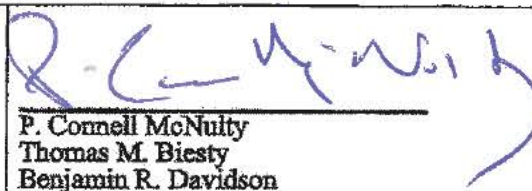
Thomas J. Riskas III, Individually



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By: _____
Thomas J. Riskas III, Member

Defendant 365DailyFit LLC, d/b/a Net Training


By: _____
Jeffrey Nicol, Member



Defendant Vensure International LLC

By: 
Phillip Edward Giannuscia II, as Director of Dominion of Virgo Investments, Inc., Member

AND

By: _____
Richard Scott Nemrow, as Owner/Member of Nemrow Consulting LLC, Member


Jessica Bjarnson, Individually

<p> <u>Philip Edward Gannuscia II, Individually</u></p> <p><u>Richard Scott Nemrow, Individually</u></p> <p><u>Jeffrey Nicol, Individually</u></p> <p><u>Thomas J. Riskas III, Individually</u></p> <p> <u>Brett L. Tolman</u> RAY QUINNEY & NEBEKER 36 South State Street Suite 1400 Salt Lake City, UT 84111 801-532-1500 btolman@rqn.com Fax: 801-532-7543</p> <p><i>Counsel for the Essent Defendants</i></p>	
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A		B	C
	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
1	Base Commerce, d/b/a Phoenix Payments	At Home Business	XXXXXXXXXXXXXXXXXX
2	Base Commerce, d/b/a Phoenix Payments	Bull Mountain My Web Mktg	XXXXXXXXXXXXXXXXXX
3	Base Commerce, d/b/a Phoenix Payments	Dham International	XXXXXXXXXXXXXXXXXX
4	Base Commerce, d/b/a Phoenix Payments	Ecommerce Ventures LLC	XXXXXXXXXXXXXXXXXX
5	Base Commerce, d/b/a Phoenix Payments	Emblem 32 LLC	XXXXXXXXXXXXXXXXXX
6	Base Commerce, d/b/a Phoenix Payments	Global Mentors LLC	XXXXXXXXXXXXXXXXXX
7	Base Commerce, d/b/a Phoenix Payments	Home Working LLC	XXXXXXXXXXXXXXXXXX
8	Base Commerce, d/b/a Phoenix Payments		

A		B		C	
	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER		
1	Evo Payments International, dba EVO				
2	Merchant Services LLC	IWSOLUTIONS18887721321	XXXXXXXXXX		
3	Evo Payments International, d/b/a EVO				
	Merchant Services LLC	MyMentor8552885894	XXXXXXXXXX		
4	Evo Payments International, d/b/a EVO				
	Merchant Services LLC	Purple Buffalo LLC	XXXXXXXXXX		

	A	B	C
	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
1	First Data Corporation	COPPER MOSAIC LLC	XXXXXXXXXXXXXX
2	First Data Corporation	GORILLA MASK LLC	XXXXXXXXXXXXXX
3	First Data Corporation	GREEN WHISPER LLC	XXXXXXXXXXXXXX
4	First Data Corporation	MUSTACHE SALAD LLC	XXXXXXXXXXXXXX
5	First Data Corporation	NEON SYMPHONY LLC	XXXXXXXXXXXXXX
6	First Data Corporation	ULTIMATE CHASTITY LLC	XXXXXXXXXXXXXX
7	First Data Corporation	YETI POINT LLC	XXXXXXXXXXXXXX
8	First Data Corporation	YUKON FLATS LLC	XXXXXXXXXXXXXX
9	First Data Corporation		

	A	B	C
	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
1	Global Merchant Advisors	Online Endeavors LLC	XXXXXXXXXXXXXXXX
2	Global Merchant Advisors	HOME WORKING LLC	XXXXXXXXXXXXXXXX
3	Global Merchant Advisors	HOME WORKING LLC	XXXXXXXXXXXXXXXX
4	Global Merchant Advisors	HOME WORKING LLC	XXXXXXXXXXXXXXXX

A	B		C
FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER	ACCOUNT NUMBER
1 Mountain America Credit Union	At Home Business, LLC	XXX	XXX
2 Mountain America Credit Union	At Home Business, LLC	XXX	XXX
3 Mountain America Credit Union	E-Comm Training Lab	XXX	XXX
4 Mountain America Credit Union	E-Comm Training Lab	XXX	XXX
5 Mountain America Credit Union	E-Comm Training Lab	XXX	XXX
6 Mountain America Credit Union	Home Working, LLC	XXX	XXX
7 Mountain America Credit Union	Home Working, LLC	XXX	XXX
8 Mountain America Credit Union	Home Working, LLC	XXX	XXX
9 Mountain America Credit Union	Home Working, LLC	XXX	XXX
10 Mountain America Credit Union	Homebound Learning, LLC	XXX	XXX
11 Mountain America Credit Union	Homebound Learning, LLC	XXX	XXX
12 Mountain America Credit Union	Homebound Learning, LLC	XXX	XXX
13 Mountain America Credit Union	Purple Buffalo LLC	XXX	XXX
14 Mountain America Credit Union	Purple Buffalo LLC	XXX	XXX
15 Mountain America Credit Union	Purple Buffalo LLC	XXX	XXX
16 Mountain America Credit Union	Rockie Mountain Solutions LLC	XXX	XXX
17 Mountain America Credit Union	Rocky Mountain Ecomm, LLC	XXX	XXX

	A	B	C
18	Mountain America Credit Union	Rocky Mountain Ecomm, LLC	XXX [REDACTED]
19	Mountain America Credit Union	Rocky Mountain Ecomm, LLC	XXX [REDACTED]

	A	B	C
	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
1	Utah Community Credit Union	365DailyFit (dba: Net Training)	XXXXXXXXXX
2	Utah Community Credit Union	Big Sky ECOMM LLC	XXXXXXXXXX
3	Utah Community Credit Union	Dahm International LLC	XXXXXXXXXX
4	Utah Community Credit Union	EARN MICROSOFT CASH LLC	XXXXXXXXXX
5	Utah Community Credit Union	EVI, LLC	XXXXXXXXXX
6	Utah Community Credit Union	Global Mentors LLC	XXXXXXXXXX
7	Utah Community Credit Union	Google Fortune Profits	XXXXXXXXXX
8	Utah Community Credit Union	MAKE GOOGLE CASH LLC	XXXXXXXXXX
9	Utah Community Credit Union	NOVUS NORTH LLC	XXXXXXXXXX
10	Utah Community Credit Union	ORANGE THUNDER	XXXXXXXXXX
11	Utah Community Credit Union	REVEEL INTL., LLC	XXXXXXXXXX
12	Utah Community Credit Union	Rockie Mountain Solutions LLC (My CEO Salary)	XXXXXXXXXX
13	Utah Community Credit Union	VENSURE INTL. LLC	XXXXXXXXXX
14	Utah Community Credit Union		XXXXXXXXXX

	A	B	C
1	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
2	Citibank, N.A.	Ecommerce Ventures LLC	XXXXXX
3	Citibank, N.A.	Cardready LLC	XXXXXX
4	Citibank, N.A.	Purple Buffalo	XXXXXX
5	Citibank, N.A.	RAFIMO ONLINE	XXXXXX
6	Citibank, N.A.	BRK PLUS LLC	XXXXXX
7	Citibank, N.A.	BIG SKY ECOMM	XXXXXX
8	Citibank, N.A.	BIZ RULEZ	XXXXXX
9	Citibank, N.A.	BIZ RULEZ #2	XXXXXX
10	Citibank, N.A.	BLUE MAGICIAN	XXXXXX
11	Citibank, N.A.	BRASS OYSTER	XXXXXX
12	Citibank, N.A.	BULL MOUNTAIN 2	XXXXXX
13	Citibank, N.A.	CHARITY VINE 2	XXXXXX
14	Citibank, N.A.	CHOC STARFISH#2	XXXXXX
15	Citibank, N.A.	ECOMMERCE EDUCA	XXXXXX
16	Citibank, N.A.	E-COMM TRAINING	XXXXXX
17	Citibank, N.A.	FORTY BLUE 2	XXXXXX
18	Citibank, N.A.	FOUNTAIN SERV	XXXXXX
19	Citibank, N.A.	FRIENDLY INS#2	XXXXXX
20	Citibank, N.A.	GENERATOR 47 #2	XXXXXX
21	Citibank, N.A.	GLOBAL MENTORS	XXXXXX
22	Citibank, N.A.	HMK INTERNET	XXXXXX
23	Citibank, N.A.	HMK INTERNET #2	XXXXXX
24	Citibank, N.A.	1JEK #1	XXXXXX
25	Citibank, N.A.	J HUNTER	XXXXXX
26	Citibank, N.A.	JASMIN WEB	XXXXXX
27	Citibank, N.A.	KF ELITE	XXXXXX
28	Citibank, N.A.	KARMA ACRE #2	XXXXXX
29	Citibank, N.A.	KARMA ACRE #4	XXXXXX
30	Citibank, N.A.	KINETIC WINGS#2	XXXXXX
31	Citibank, N.A.	KOHANOF GLOBAL	XXXXXX
32	Citibank, N.A.	LATERAL BEACH 2	XXXXXX
33	Citibank, N.A.	LONDON NECTAR 2	XXXXXX
34	Citibank, N.A.	MAROON WISDOM#2	XXXXXX
35	Citibank, N.A.	MAROON WISDOM#4	XXXXXX
36	Citibank, N.A.	MARTINEZ WEB	XXXXXX
37	Citibank, N.A.	METRO PATRIOT#2	XXXXXX
38	Citibank, N.A.	MONTANO WEB	XXXXXX
39	Citibank, N.A.	OSCAL PRODUCTS	XXXXXX
40	Citibank, N.A.	OUTFIT 7 #2	XXXXXX
41	Citibank, N.A.	PHOENIX ONLINE	XXXXXX
42	Citibank, N.A.	PHOENIX #2	XXXXXX
43	Citibank, N.A.	PORCELAIN RYE	XXXXXX
44	Citibank, N.A.	RJ ASH	XXXXXX
45	Citibank, N.A.	RJ ASH #2	XXXXXX
46	Citibank, N.A.	RJ ASH #3	XXXXXX

	A	B	C
1	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
47	Citibank, N.A.	ROCKY MOUNTAIN	XXXXXX
48	Citibank, N.A.	SAMA GROUP LLC	XXXXXX
49	Citibank, N.A.	THIRD CAPTAIN	XXXXXX
50	Citibank, N.A.	TOROS SERVICES	XXXXXX
51	Citibank, N.A.	URBAN MATADOR#1	XXXXXX
52	Citibank, N.A.	URBAN MATADOR#2	XXXXXX
53	Citibank, N.A.	VANILLA TAXI	XXXXXX
54	Citibank, N.A.	VANTAGE BUS #1	XXXXXX
55	Citibank, N.A.	1JEK LLC	XXXXXX
56	Citibank, N.A.	1JEK LLC	XXXXXX
57	Citibank, N.A.	2012ROBLEDO	XXXXXX
58	Citibank, N.A.	2Cherish LLC	XXXXXX
59	Citibank, N.A.	2Cherish LLC	XXXXXX
60	Citibank, N.A.	Award Web Services LLC	XXXXXX
61	Citibank, N.A.	BJC Ventures LLC	XXXXXX
62	Citibank, N.A.	BJC Ventures LLC	XXXXXX
63	Citibank, N.A.	BRK Plus LLC	XXXXXX
64	Citibank, N.A.	BRK Plus LLC	XXXXXX
65	Citibank, N.A.	CGROVES LLC	XXXXXX
66	Citibank, N.A.	CGROVES LLC	XXXXXX
67	Citibank, N.A.	CGROVES LLC	XXXXXX
68	Citibank, N.A.	CGROVES LLC	XXXXXX
69	Citibank, N.A.	CHERISH LLC	XXXXXX
70	Citibank, N.A.	CHERISH LLC	XXXXXX
71	Citibank, N.A.	Copper Mosaic LLC	XXXXXX
72	Citibank, N.A.	Crizaldo Net LLC	XXXXXX
73	Citibank, N.A.	CULVER ONLINE TRAINING LLC	XXXXXX
74	Citibank, N.A.	DE LA ROCA	XXXXXX
75	Citibank, N.A.	DE LA ROCA	XXXXXX
76	Citibank, N.A.	DE LA ROCA	XXXXXX
77	Citibank, N.A.	DG Web Services LLC	XXXXXX
78	Citibank, N.A.	DG Web Services LLC	XXXXXX
79	Citibank, N.A.	Digital Zebra LLC	XXXXXX
80	Citibank, N.A.	Double A LLC	XXXXXX
81	Citibank, N.A.	Double A LLC	XXXXXX
82	Citibank, N.A.	Double A LLC	XXXXXX
83	Citibank, N.A.	Franklin Resources LLC	XXXXXX
84	Citibank, N.A.	Franklin Resources LLC	XXXXXX
85	Citibank, N.A.	Franklin Resources LLC	XXXXXX
86	Citibank, N.A.	Greenfield Svcs LLC	XXXXXX
87	Citibank, N.A.	Greenfield Svcs LLC	XXXXXX
88	Citibank, N.A.	Greenfield Svcs LLC	XXXXXX
89	Citibank, N.A.	GROSS NET LLC	XXXXXX
90	Citibank, N.A.	GROSS NET LLC	XXXXXX

	A	B	C
1	FINANCIAL INSTITUTION	ACCOUNT NAME	ACCOUNT NUMBER
91	Citibank, N.A.	ISTANALONE LLC	XXXXXX [REDACTED]
92	Citibank, N.A.	Itay S. Sales & Consulting, Inc.	XXXXXX [REDACTED]
93	Citibank, N.A.	KAMLYNN LLC	XXXXXX [REDACTED]
94	Citibank, N.A.	Karmell LLC	XXXXXX [REDACTED]
95	Citibank, N.A.	Karmell LLC	XXXXXX [REDACTED]
96	Citibank, N.A.	KF ELITE LLC	XXXXXX [REDACTED]
97	Citibank, N.A.	Kinetic Wings LLC	XXXXXX [REDACTED]
98	Citibank, N.A.	LARIWEB LLC	XXXXXX [REDACTED]
99	Citibank, N.A.	LARIWEB LLC	XXXXXX [REDACTED]
100	Citibank, N.A.	LARIWEB LLC	XXXXXX [REDACTED]
101	Citibank, N.A.	LEMAY PRODUCTS	XXXXXX [REDACTED]
102	Citibank, N.A.	LEMAY PRODUCTS	XXXXXX [REDACTED]
103	Citibank, N.A.	Mustache Salad LLC	XXXXXX [REDACTED]
104	Citibank, N.A.	Nilbog LLC	XXXXXX [REDACTED]
105	Citibank, N.A.	Oscal Products LLC	XXXXXX [REDACTED]
106	Citibank, N.A.	Patel Marketing LLC	XXXXXX [REDACTED]
107	Citibank, N.A.	Phoenix Online LLC	XXXXXX [REDACTED]
108	Citibank, N.A.	PinaCare LLC	XXXXXX [REDACTED]
109	Citibank, N.A.	Plastic Pants LLC	XXXXXX [REDACTED]
110	Citibank, N.A.	Prime Project LLC	XXXXXX [REDACTED]
111	Citibank, N.A.	RAFIMO ONLINE	XXXXXX [REDACTED]
112	Citibank, N.A.	RJ ASH	XXXXXX [REDACTED]
113	Citibank, N.A.	Sama Group LLC	XXXXXX [REDACTED]
114	Citibank, N.A.	Samiy Solutions LLC	XXXXXX [REDACTED]
115	Citibank, N.A.	SEM PROCESSING LLC	XXXXXX [REDACTED]
116	Citibank, N.A.	SEM PROCESSING LLC	XXXXXX [REDACTED]
117	Citibank, N.A.	SEM PROCESSING LLC	XXXXXX [REDACTED]
118	Citibank, N.A.	Sevman Marketing LLC	XXXXXX [REDACTED]
119	Citibank, N.A.	Sevman Marketing LLC	XXXXXX [REDACTED]
120	Citibank, N.A.	Sevman Marketing LLC	XXXXXX [REDACTED]
121	Citibank, N.A.	SG Resources LLC	XXXXXX [REDACTED]
122	Citibank, N.A.	SG Resources LLC	XXXXXX [REDACTED]
123	Citibank, N.A.	Ultimate Chastity LLC	XXXXXX [REDACTED]
124	Citibank, N.A.	Velvet Window LLC	XXXXXX [REDACTED]
125	Citibank, N.A.	WEITZEL RESOURCES LLC	XXXXXX [REDACTED]
126	Citibank, N.A.	Yeti Point LLC	XXXXXX [REDACTED]
127	Citibank, N.A.	ADL LLC	XXXXXX [REDACTED]
128	Citibank, N.A.	RAFIMO ONLINE	XXXXXX [REDACTED]
129	Citibank, N.A.	SEM PROCESSING LLC	XXXXXX [REDACTED]
130	Citibank, N.A.	Cardready LLC	XXXXXX [REDACTED]
131	Citibank, N.A.	Cardready LLC	XXXXXX [REDACTED]
132	Citibank, N.A.	Tri Mi	XXXXXX [REDACTED]
133	Citibank, N.A.	Jasmine Harris	XXXXXX [REDACTED]