

1 DAVID C. SHONKA
Acting General Counsel
2 GREGORY A. ASHE
VA Bar No. 39131
3 KATHARINE ROLLER
IL Bar No. 6316909
4 Federal Trade Commission
600 Pennsylvania Avenue NW
5 Washington, DC 20850
6 Telephone: 202-326-3719 (Ashe)
Telephone: 202-326-3582 (Roller)
7 Facsimile: 202-326-3768
8 Email: gashe@ftc.gov, kroller@ftc.gov

9 Attorneys for Plaintiff

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF ARIZONA**

12 **FEDERAL TRADE COMMISSION,**

13 Plaintiff,

14 v.

15 **CAPITOL NETWORK DISTANCE**
16 **LEARNING PROGRAMS, LLC, et al.,**

17 Defendants.

Case No. CV-16-00350-PHX-DJH

**STIPULATION TO ENTER FINAL
ORDER FOR PERMANENT
INJUNCTION AND SETTLEMENT OF
CLAIMS AS TO DEFENDANTS
VERITAS SALES, INC., ADAM
POLLICINO, AND ANTHONY
CLAVIEN**

19
20 Plaintiff, Federal Trade Commission (“FTC”), commenced this civil action on
21 February 8, 2016, by filing its Complaint (Doc. 1) seeking a permanent injunction and
22 other equitable relief pursuant to Section 13(b) of the Federal Trade Commission Act
23 (“FTC Act”), 15 U.S.C. § 53(b). On February 17, 2016, the Court entered a Stipulated
24

1 Temporary Restraining Order against Defendants (Doc. 25). On March 11, 2016, the
2 Court entered a Stipulated Preliminary Injunction against Defendants (Doc. 35). Pursuant
3 to Federal Rule of Evidence 408 and the protections afforded therein, the FTC and
4 Defendants Veritas Sales, Inc., Adam Pollicino, and Anthony Clavien have stipulated and
5 agreed to entry of this Final Order for Permanent Injunction and Settlement of Claims
6 (“Order”) to resolve all matters in dispute in this action between them. A proposed order
7 is attached hereto.
8

9 FINDINGS

10 By stipulation of the parties, the Court finds as follows:

- 11 1. This Court has jurisdiction over this matter.
- 12 2. The Complaint charges that the Settling Defendants participated in deceptive acts
13 or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, in connection
14 with the marketing and sale of academic degree and certification programs.
- 15 3. The Settling Defendants neither admit nor deny any of the allegations in the
16 Complaint, except as specifically stated in this Order. Only for purposes of this
17 action, the Settling Defendants admit the facts necessary to establish jurisdiction.
18
- 19 4. The Settling Defendants waive any claim that they may have under the Equal
20 Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action
21 through the date of this Order, and agree to bear their own costs and attorney fees.
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

5. The Settling Defendants waive all rights to appeal or otherwise challenge or contest the validity of this Order.

6. Entry of this Order is in the public interest.

DEFINITIONS

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

A. **“Academic Degree or Certification Program”** means any product, service, plan, or program that provides or purports to provide doctoral degrees, master’s degrees, bachelor’s degrees, associate’s degrees, high school diplomas or high school equivalency diplomas or certificates, certifications, certificates, or any other document that confers or purports to confer a qualification, records or purports to record success in examinations or successful completion of a course of study, or evidences or purports to evidence that a consumer has completed and shown proficiency in a curriculum recognized as necessary to earn the indicated degree, diploma, certification, certificate, or other document, whether denominated as a degree, diploma, certification, certificate, or other name, whether denoted as a real or novelty item.

B. **“Customer”** means any person who has paid, or may be required to pay, for products, services, plans, or programs offered for sale or sold by any other person.

C. **“Defendants”** means Capitol Network Distance Learning Programs, LLC, Capital Network Digital Licensing Programs, LLC, Veritas Sales, Inc., Nicholas Pollicino,

1 Anthony Clavien, and Adam Pollicino, individually, collectively, or in any
2 combination.

3 D. **“Person”** means a natural person, organization, or other legal entity, including a
4 corporation, partnership, proprietorship, association, cooperative, or any other
5 group or combination acting as an entity.

6 E. **“Settling Defendants”** means the Individual Settling Defendants and the Corporate
7 Settling Defendant, individually, collectively, or in any combination. **“Corporate**
8 **Settling Defendant”** means Veritas Sales, Inc. and its successors and assigns.

9 **“Individual Settling Defendants”** means Anthony J. Clavien and Adam F.
10 Pollicino, and any other name by which they may be known.
11

12 **ORDER**

13 **BAN ON ACADEMIC DEGREE OR CERTIFICATION PROGRAMS**

14 **I. IT IS THEREFORE ORDERED** that the Settling Defendants, whether acting
15 directly or through any other person, are permanently restrained and enjoined from:
16

17 A. Advertising, marketing, promoting, or offering for sale any academic degree or
18 certification program; and
19

20 B. Assisting others engaged in the advertising, marketing, promoting, or offering
21 for sale of any academic degree or certification program.
22

PROHIBITION AGAINST MISREPRESENTATIONS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

II. IT IS FURTHER ORDERED that the Settling Defendants, their officers, agents, and employees, 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, in connection with promoting or offering for sale any good or service are permanently restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication:

- A. The total costs to purchase, receive, or use, and the quantity of, any good or service;
- B. Any material restriction, limitation, or condition to purchase, receive, or use any good or service;
- C. Any material aspect of the performance, efficacy, nature, or central characteristics of any good or service;
- D. The nature, expertise, position, or job title of any person who provides any good or service;
- E. The person who will provide any good or service;
- F. Any material aspect of the nature or terms of any refund, cancellation, exchange, or repurchase policy, including, but not limited to, the likelihood of a consumer obtaining a full or partial refund, or the circumstances in which the full or partial refund will be granted to the consumer;

1 G. That any person providing a testimonial has purchased, received, or used the
2 good or service;

3 H. That the experience represented in a testimonial of a good or service
4 represents the person's actual experience resulting from the use of the good
5 or service under the circumstances depicted in the advertisement;

6 I. That the experience represented in a testimonial of a good or service is
7 representative of what consumers will generally achieve with the good or
8 service;

9 J. That any person is affiliated with, endorsed or approved by, accredited by,
10 or otherwise connected to any other person; government entity; public,
11 non-profit, or other non-commercial program; or any other program; or
12

13 K. Any other fact material to a consumer's decision to purchase any good or
14 service.
15

16 **MONETARY JUDGMENT AND PARTIAL SUSPENSION**

17 **III. IT IS FURTHER ORDERED** that:
18

19 A. Judgment in the amount of ONE MILLION DOLLARS (\$1,000,000) is entered in
20 favor of the FTC against the Settling Defendants, jointly and severally, as equitable
21 monetary relief.
22

23 B. In partial satisfaction of the judgment against the Settling Defendants:

24 1. Bank of America shall, within ten (10) business days of receipt of a copy
25

1 of this Order, make a one-time transfer to the FTC or its designated agent
2 of all funds, if any, in (a) account number xxxx1322 in the name of
3 Veritas Sales; Inc.; and (b) account number xxxx3862 in the name of
4 Veritas Sales, Inc. Upon such transfers, this Order shall impose no
5 further restrictions on such accounts.
6

7 2. Wells Fargo Bank shall, within ten (10) business days of receipt of a copy
8 of this Order, transfer to the FTC or its designated agent the excess, if any,
9 of the balance in account number xxxx0348 in the name of Veritas Sales,
10 Inc. over \$5,000. Upon such transfer, this Order shall impose no further
11 restrictions on such account.
12

13 3. Wells Fargo Bank shall, within ten (10) business days of receipt of a copy
14 of this Order, make a one-time transfer to the FTC or its designated agent
15 of all funds, if any, in: (a) account number xxxx0355 in the name of
16 Veritas Sales, Inc.; (b) account number xxxx1767 in the name of Veritas
17 Sales, Inc.; (c) account number xxxx1809 in the name of Veritas Sales,
18 Inc.; (d) account number xxxx9328 in the name of Veritas Sales, Inc.; (e)
19 account number xxxx0470 in the name of AFP Inc.; (f) account number
20 xxxx0504 in the name of AFP Inc.; (g) account number xxxx1320 in the
21 name of Valais Consulting, Inc.; (h) account number xxxx3631 in the
22
23
24
25

1 name of Valais Consulting, Inc.; (i) account number xxxx6126 in the
2 name of Adam Pollicino; (j) account number xxxx9541 in the name of
3 Adam Pollicino; and (k) account number xxxx9207 in the name of
4 Anthony Clavien. Upon such transfers, this Order shall impose no
5 further restrictions on such accounts.
6

7 4. JP Morgan Chase Bank shall, within ten (10) business days of receipt of a
8 copy of this Order, make a one-time transfer to the FTC or its designated
9 agent of all funds, if any, in: (a) account number xxxx2251 in the name of
10 AFP, Inc.; (b) account number xxxx8626 in the name of AFP, Inc.; and
11 (c) account number xxxx7655 in the name of Anthony Clavien. Upon
12 such transfers, this Order shall impose no further restrictions on such
13 accounts.
14
15

16 5. Deutsches Bank shall, within ten (10) business days of receipt of a copy of
17 this Order, make a one-time transfer to the FTC or its designated agent of
18 all funds, if any, in account number xxxx5790 in the name of Anthony
19 Clavien. Upon such transfer, this Order shall impose no further
20 restrictions on such account.;
21
22
23
24
25
26
27
28

1 C. Upon completion of the asset transfers set forth in Section III.B of this Order, the
2 remainder of the judgment as to the Settling Defendants is suspended, subject to the
3 Subsections below.

4 D. The asset freeze is modified to permit the transfers identified in this Section.
5 Upon completion of those transfers, any asset freeze created by the Stipulated
6 Preliminary Injunction (Doc. 35) is dissolved.

7
8 E. The FTC's agreement to the suspension of part of the judgment is expressly
9 premised upon the truthfulness, accuracy, and completeness of the Settling
10 Defendants' sworn financial statements and related documents (collectively,
11 "financial representations") submitted to the FTC, namely: (1) the Financial
12 Statement of Corporate Defendant Veritas Sales, Inc. signed on February 29, 2016
13 by Adam Pollicino, including the attachments; (2) the Financial Statement of
14 Individual Defendant Anthony Clavien signed on February 29, 2016, including the
15 attachments; and (3) the Financial Statement of Individual Defendant Adam
16 Pollicino signed on February 29, 2016, including the attachments.

17
18
19 F. The suspension of the judgment will be lifted as to a Settling Defendant if, upon
20 motion by the FTC, the Court finds that such Settling Defendant failed to disclose
21 any material asset, materially misstated the value of any asset, or made any other
22 material misstatement or omission in the financial representations identified above.
23
24
25
26
27
28

1 G. If the suspension of the judgment is lifted, the judgment becomes immediately due
2 as to that Settling Defendant in the amount specified in Subsection A above (which
3 the parties stipulate only for purposes of this Section represents the consumer
4 injury alleged in the Complaint, less any payment previously made pursuant to this
5 Section, plus interest computed from the date of entry of this Order).

6 H. The Settling Defendants relinquish dominion and all legal and equitable right, title,
7 and interest in all assets transferred pursuant to this Order and may not seek the
8 return of any assets.

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

13 J. The facts alleged in the Complaint establish all elements necessary to sustain an
14 action by the FTC pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11
15 U.S.C. § 523(a)(2)(A), and this Order will have collateral estoppel effect for such
16 purposes.

17 K. The Settling Defendants acknowledge that their Taxpayer Identification Numbers
18 (Social Security Numbers or Employer Identification Numbers), which the Settling
19 Defendants previously submitted to the FTC, may be used for collecting and
20

1 reporting on any delinquent amount arising out of this Order, in accordance with 31
2 U.S.C. §7701.

3 L. All money paid to the FTC pursuant to this Order may be deposited into a fund
4 administered by the FTC or its designee to be used for equitable relief, including
5 consumer redress and any attendant expenses for the administration of any redress
6 fund. If a representative of the FTC decides that direct redress to consumers is
7 wholly or partially impracticable or money remains after redress is completed, the
8 FTC may apply any remaining money for such other equitable relief (including
9 consumer information remedies) as it determines to be reasonably related to
10 Defendants' practices alleged in the Complaint. Any money not used for such
11 equitable relief is to be deposited to the U.S. Treasury as disgorgement.
12 Defendants have no right to challenge any actions the FTC or its representatives
13 may take pursuant to this Subsection.
14
15

16 **CUSTOMER INFORMATION**

17 **IV. IT IS FURTHER ORDERED** that the Settling Defendants, their officers, agents,
18 and employees, and all other persons in active concert or participation with any of
19 them, who receive actual notice of this Order, whether acting directly or indirectly,
20 are permanently restrained and enjoined from directly or indirectly:
21

22 A. Disclosing, using, or benefitting from customer information, including the name,
23 address, telephone number, email address, social security number, other identifying
24

1 information, or any data that enables access to a customer's account (including a
2 credit card, bank account, or other financial account), that any Defendant obtained
3 prior to entry of this Order in connection with the marketing and sale of any
4 academic degree or certification program; and

- 5 B. Failing to destroy such customer information in all forms in their possession,
6 custody, or control within 30 days after receipt of written direction to do so from a
7 representative of the FTC.
8

9 Provided, however, that customer information need not be disposed of, and may be
10 disclosed, to the extent requested by a government agency or required by law,
11 regulation, or court order.
12

13 ORDER ACKNOWLEDGMENTS

- 14 V. **IT IS FURTHER ORDERED** that the Settling Defendants obtain
15 acknowledgments of receipt of this Order:

- 16 A. Each Settling Defendant, within 7 days of entry of this Order, must submit
17 to the FTC an acknowledgment of receipt of this Order sworn under penalty
18 of perjury.
19
20 B. For 5 years after entry of this Order, each Individual Settling Defendant for
21 any business that such Individual Settling Defendant, individually or
22 collectively with any other Defendants, is the majority owner or controls
23 directly or indirectly, and the Corporate Settling Defendant, must deliver a
24

1 copy of this Order to: (1) all principals, officers, directors, and LLC
2 managers and members; (2) all employees, agents, and representatives who
3 participate in conduct related to the subject matter of the Order; and (3) any
4 business entity resulting from any change in structure as set forth in the
5 Section titled Compliance Reporting. Delivery must occur within 7 days of
6 entry of this Order for current personnel. For all others, delivery must
7 occur before they assume their responsibilities.
8

- 9 C. From each individual or entity to which a Settling Defendant delivered a
10 copy of this Order, that Settling Defendant must obtain, within 30 days, a
11 signed and dated acknowledgment of receipt of this Order.
12

13 COMPLIANCE REPORTING

14 **VI. IT IS FURTHER ORDERED** that the Settling Defendants make timely
15 submissions to the FTC:

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

- 18 1. Each Settling Defendant must: (a) identify the primary physical, postal,
19 and email address and telephone number, as designated points of contact,
20 which representatives of the FTC may use to communicate with that
21 Settling Defendant; (b) identify all of that Settling Defendant's
22 businesses by all of their names, telephone numbers, and physical,
23
24
25

1 postal, email, and Internet addresses; (c) describe the activities of each
2 business, including the goods and services offered, the means of
3 advertising, marketing, and sales, and the involvement of any other
4 Defendant (which each Individual Settling Defendant must describe if he
5 knows or should know due to his own involvement); (d) describe in
6 detail whether and how that Settling Defendant is in compliance with
7 each Section of this Order; and (e) provide a copy of each Order
8 Acknowledgment obtained pursuant to this Order, unless previously
9 submitted to the FTC.
10

11 2. Additionally, each Individual Settling Defendant must: (a) identify all
12 telephone numbers and all physical, postal, email and Internet addresses,
13 including all residences; (b) identify all business activities, including any
14 business for which such Individual Settling Defendant performs services
15 whether as an employee or otherwise and any entity in which such
16 Individual Settling Defendant has any ownership interest; and (c)
17 describe in detail such Individual Settling Defendant's involvement in
18 each such business, including title, role, responsibilities, participation,
19 authority, control, and any ownership.
20
21
22
23
24
25
26
27
28

1
2
3
B. For 10 years after entry of this Order, each Settling Defendant must submit a
compliance notice, sworn under penalty of perjury, within 14 days of any
change in the following:

4
5
6
7
8
9
10
11
1. Each Settling Defendant must report any change in: (a) any
designated point of contact; or (b) the structure of the Corporate
Settling Defendant or any entity that such Settling 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.

12
13
14
15
16
17
18
19
20
21
2. Additionally, each Individual Settling 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 such Individual Settling Defendant
performs services whether as an employee or otherwise and any
entity in which such Individual Settling Defendant has any ownership
interest, and identify the name, physical address, and any Internet
address of the business or entity.

- 1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
- C. Each Settling Defendant must submit to the FTC notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such Settling Defendant within 14 days of its filing.
 - D. Any submission to the FTC 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 an FTC representative in writing, all submissions to the FTC 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. Capitol Network Distance Learning Programs, X160026.

20
21

RECORDKEEPING

22
23
24
25

VII. IT IS FURTHER ORDERED that the Settling Defendants must create certain records for 10 years after entry of the Order, and retain each such record for 5 years. Specifically, the Corporate Settling Defendant and each Individual Settling

1 Defendant for any business that such Individual Settling Defendant, individually or
2 collectively with any other Defendants, is a majority owner or controls directly or
3 indirectly, must create and retain the following records:

- 4 A. Accounting records showing the revenues from all goods or services sold;
5 B. Personnel records showing, for each person providing services, whether as
6 an employee or otherwise, that person's: name; addresses; telephone
7 numbers; job title or position; dates of service; and (if applicable) the reason
8 for termination;
9 C. Records of all consumer complaints and refund requests, whether received
10 directly or indirectly, such as through a third party, and any response;
11 D. All records necessary to demonstrate full compliance with each provision of
12 this Order, including all submissions to the FTC; and
13 E. A copy of each materially different advertisement or other marketing
14 material.
15
16
17

18 **COMPLIANCE MONITORING**

19 **VIII. IT IS FURTHER ORDERED** that, for the purpose of monitoring the Settling
20 Defendants' compliance with this Order, including the financial representations
21 upon which part of the judgment was suspended and any failure to transfer any
22 assets as required by this Order:
23
24
25
26
27
28

- 1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
- A. Within 14 days of receipt of a written request from a representative of the FTC, each Settling 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 FTC 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; provided that a Settling Defendant, after attempting to resolve a dispute without court action and for good cause shown, may file a motion with this Court seeking an order for one or more of the protections set forth in Rule 26(c).
- B. For matters concerning this Order, the FTC is authorized to communicate directly with each Settling Defendant. The Settling Defendants must permit representatives of the FTC to interview any employee or other person affiliated with any Settling Defendant who has agreed to such an interview. The person interviewed may have counsel present.
- C. The FTC may use all other lawful means, including posing, through its representatives as consumers, suppliers, or other individuals or entities, to the Settling Defendants or any individual or entity affiliated with the Settling Defendants, without the necessity of identification or prior notice. Nothing

1 in this Order limits the FTC's lawful use of compulsory process, pursuant to
2 Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

3 D. Upon written request from a representative of the FTC, any consumer
4 reporting agency must furnish consumer reports concerning the Individual
5 Settling Defendant, pursuant to Section 604(1) of the Fair Credit Reporting
6 Act, 15 U.S.C. §1681b(a)(1).
7

8 **ENTRY OF JUDGMENT**

9 **IX. IT IS FURTHER ORDERED** that there is no just reason for delay of entry of this
10 judgment, and that, pursuant to Federal Rule of Civil Procedure 54(b), the Clerk
11 immediately shall enter this Order as a final judgment as to defendants Veritas
12 Sales, Inc., Anthony Clavien, and Adam Pollicino.
13

14 **RETENTION OF JURISDICTION**

15 **X. IT IS FURTHER ORDERED** that this Court retains jurisdiction of this matter for
16 purposes of construction, modification, and enforcement of this Order.
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED.

FOR SETTLING DEFENDANTS:

FOR PLAINTIFF:




VERITAS SALES, INC., Defendant

By:



ANTHONY J. CLAVIEN, Defendant



ADAM F. POLLICINO, Defendant



ANDREWS. GORDON (AZ 003660)

JOHN C. KELLY (AZ 012770)

SCOTT M. BENNETT (AZ 022350)

Coppersmith Brockelman PLC

2800 North Central Avenue, Suite 1200

Phoenix, AZ 85004

Telephone: 602-381-5490

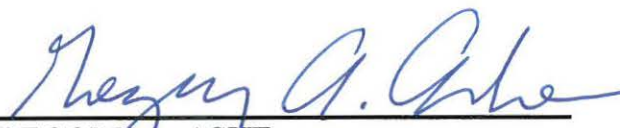
Facsimile: 602-772-3738

Email: agordon@cblawyers.com,

jkelly@cblawyers.com,

sbennett@cblawyers.com

*Attorneys for Defendants Veritas Sales,
Inc., Anthony Clavien, and Adam Pollicino*



GREGORY A. ASHE

VA Bar No. 39131

KATHARINE ROLLER

IL Bar No. 6316909

Federal Trade Commission

600 Pennsylvania Avenue NW

Washington, DC 20850

Telephone: 202-326-3719 (Ashe)

Telephone: 202-326-3582 (Roller)

Facsimile: 202-326-3768

Email: gashe@ftc.gov, kroller@ftc.gov

Attorneys for Plaintiff

FEDERAL TRADE COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 10, 2017, I electronically transmitted **STIPULATION TO ENTER FINAL ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT AS TO DEFENDANTS VERITAS SALES, INC., ADAM POLLICINO, AND ANTHONY CLAVIEN** and [proposed] **STIPULATED FINAL ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT AS TO DEFENDANTS VERITAS SALES, INC., ADAM POLLICINO, AND ANTHONY CLAVIEN** to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

- Andrew S. Gordon
- John Christian Kelly
- Scott Michael Bennett
- Mark Walter Horne
- Gregory A. Ashe
- Katharine Roller

/s/ Gregory A. Ashe
 Attorney for Plaintiff Federal Trade
 Commission