

1
2
3
4
5
6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 FEDERAL TRADE COMMISSION,

9 Plaintiff,

10 v.

11 CRYSTAL A. EWING, individually and as a
12 director or officer of Consumer Direct
13 Enterprises, LLC, Top Choice, Inc., Classic
14 Productions, LLC, and Response Processing,
15 LLC; DAVID F. EWING, individually and as a
16 director or officer of Consumer Direct
17 Enterprises, LLC; CONSUMER DIRECT
18 ENTERPRISES, LLC, a Nevada limited
19 liability company; TOP CHOICE, INC., d.b.a.
20 Sweepstakes Information Reporting Services,
Cash Claim Information Center, Consumer
Award Advisory Service, Mega Marketing
Group, and Prize Distribution Center, a
Nevada corporation; CLASSIC
PRODUCTIONS, LLC, a Nevada limited
liability company; and RESPONSE
PROCESSING, LLC, a Nevada limited
liability company,

21 Defendants.

Case No.

**STIPULATED FINAL JUDGMENT
AND ORDER FOR PERMANENT
INJUNCTION AS TO DEFENDANTS
CRYSTAL EWING; DAVID EWING;
CONSUMER DIRECT ENTERPRISES,
LLC; TOP CHOICE, INC.; CLASSIC
PRODUCTIONS, LLC; AND
RESPONSE PROCESSING, LLC**

22 Plaintiff Federal Trade Commission ("Commission" or "FTC"), pursuant to Section 13(b)
23 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), filed its Complaint for
24 Injunctive and Other Equitable Relief, including consumer redress, alleging that defendants
25 Crystal Ewing, David Ewing, Consumer Direct Enterprises, LLC, Top Choice, Inc., Classic
26 Productions, LLC, and Response Processing, LLC engaged in deceptive acts and practices in
27 connection with the direct mail marketing of prize promotions in violation of Section 5(a) of the
28

1 FTC Act, 15 U.S.C. § 45(a).

2 The Commission and defendants Crystal Ewing, David Ewing, Consumer Direct
3 Enterprises, LLC, Top Choice, Inc., Classic Productions, LLC, and Response Processing, LLC
4 (hereinafter referred to collectively as “defendants”), by and through their respective attorneys,
5 have consented to the entry of this Stipulated Final Judgment and Order for Permanent Injunction
6 (“Order”), which resolves all matters and claims in dispute between them arising from the
7 Complaint up to the date of entry of this Order, on the following terms and conditions, without a
8 trial or adjudication of any issue of law or fact.

9 NOW, THEREFORE, the Commission and defendants having requested the Court to
10 enter this Order, it is **ORDERED, ADJUDGED, AND DECREED** as follows:

11 **FINDINGS**

12 A. This is an action by the Commission instituted under Section 13(b) of the FTC
13 Act, 15 U.S.C. § 53(b). Pursuant to this section, the Commission has the authority to seek the
14 relief contained herein.

15 B. The Commission’s Complaint states a claim upon which relief may be granted
16 against defendants under Sections 5(a) and 13(b) of the Federal Trade Commission Act, 15
17 U.S.C. §§ 45(a) and 53(b).

18 C. This Court has jurisdiction over the subject matter of this case and all parties
19 hereto. Venue in the District of Nevada is proper.

20 D. The alleged activities of defendants are in or affecting commerce, as defined in
21 Section 4 of the FTC Act, 15 U.S.C. § 44.

22 E. The parties shall each bear their own costs and attorney’s fees incurred in this
23 action and have waived all claims under the Equal Access to Justice Act, 28 U.S.C. § 2412,
24 *amended by* Pub. L. 104-121, 110 Stat. 847, 863-64 (1996), and all rights to seek judicial review
25 or otherwise to challenge the validity of this Order.

26 F. This Order does not constitute, and shall not be interpreted to constitute, either an
27 admission by defendants or a finding by the Court that defendants have engaged in any violations
28

1 of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), or any other law or regulation, and, in fact,
2 defendants specifically deny violating the FTC Act or any other law or regulation.

3 G. Entry of this Order is in the public interest.

4 **DEFINITIONS**

5 For purposes of this Order, the following definitions shall apply:

6 A. **"Asset"** means any legal or equitable interest in, right to, or claim to, any real and
7 personal property including, but not limited to, chattels, goods, instruments, equipment, fixtures,
8 general intangibles, effects, leaseholds, mail or other deliveries, inventory, checks, notes,
9 accounts, credits, receivables, funds, monies, and all cash, wherever located.

10 B. **"Assisting"** means providing substantial assistance or support to any person. For
11 purposes of this Order, providing substantial assistance or support includes, but is not limited to:
12 (a) preparing, printing or transmitting invoices; (b) recording or verifying sales solicitations;
13 (c) performing customer service functions including, but not limited to, receiving or responding
14 to consumer complaints, obtaining or receiving identifying and financial information from
15 consumers, and communicating with consumers on behalf of the seller or telemarketer;
16 (d) developing, providing or arranging for the development or provision of sales scripts or any
17 other marketing material; (e) verifying, processing, fulfilling or arranging for the fulfillment of
18 orders; (f) developing, providing or arranging for the provision of names of potential customers;
19 (g) collecting or arranging for the collection of accounts receivable or other amounts owed;
20 (h) providing or arranging for the provision of post office boxes or the services of commercial
21 mail receiving agencies; or (i) performing or providing marketing services of any kind.

22 C. **"Corporate defendants"** means Consumer Direct Enterprises, LLC; Top Choice,
23 Inc., d.b.a. Sweepstakes Information Reporting Services, Cash Claim Information Center,
24 Consumer Award Advisory Service, Mega Marketing Group, Prize Distribution Center; Classic
25 Productions, LLC; and Response Processing, LLC.

26 D. **"Individual Defendants"** means Crystal Ewing and David Ewing.

27 E. **"Direct mail"** means any delivery system used to solicit consumers for the
28

1 purchase of goods or services, or to provide any product, service or printed material to any
2 consumer including, but not limited to, the United States Postal Service, any express mail or
3 overnight mail delivery service, or other domestic or international mail or parcel service, whether
4 publicly or privately owned.

5 F. **"Document"** is synonymous in meaning and equal in scope to the usage of the
6 term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts,
7 photographs, audio and video recordings, computer records, and other data compilations from
8 which information can be obtained and translated, if necessary, through detection devices into
9 reasonably usable form. A draft or non-identical copy is a separate document within the meaning
10 of the term.

11 G. **"Material"** means likely to affect a person's choice of, or conduct regarding,
12 goods or services.

13 H. **"Person"** means any natural person and any organization or other legal entity,
14 including a corporation, partnership, sole proprietorship, limited liability company, association,
15 cooperative, government agency, or any other group or combination acting as an entity.

16 I. **"Prize promotion"** means (1) an oral or written express or implied representation
17 that a person has won, has been selected to receive, or may be eligible to receive a prize or
18 purported prize, or (2) a sweepstakes, contest or other game of chance.

19 J. **"Telemarketing"** means a plan, program or campaign which is conducted to
20 induce the purchase of goods or services or a charitable contribution, by use of one or more
21 telephones and which involves more than one interstate telephone call.

22 ORDER

23 I. BAN ON CERTAIN ACTIVITIES

24 IT IS THEREFORE ORDERED that defendants are hereby permanently restrained and
25 enjoined from engaging, participating or assisting others in the advertising, promoting,
26 telemarketing, offering for sale, selling or distributing of prize promotions.

II. PROHIBITED MISREPRESENTATIONS

IT IS FURTHER ORDERED that defendants, their successors and assigns, and their officers, agents, directors, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any person, trust, corporation, subsidiary, division or other device, or any of them, in connection with the advertising, promoting, telemarketing, offering for sale, selling or distributing of any good or service are hereby permanently restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication, any fact material to a consumer's decision to purchase the defendants' goods or services.

III. PROHIBITED DISCLOSURE OF CUSTOMER INFORMATION

IT IS FURTHER ORDERED that defendants, their successors and assigns, and their officers, agents, directors, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any person, trust, corporation, subsidiary, division or other device, or any of them, are hereby permanently restrained and enjoined from selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, Social Security number, credit card number, bank account number, e-mail address or other identifying information of any person contacted by defendants in connection with the advertising, promoting, marketing, offering for sale, selling or distributing of prize promotions at any time prior to entry of this Order. *Provided, however*, that defendants may disclose such identifying information to a law enforcement agency or as required by any law, regulation or court order.

IV. MONETARY JUDGMENT

IT IS FURTHER ORDERED that:

A. Judgment in the amount of \$10,219,664 is hereby entered in favor of the Commission against the defendants, for which they are jointly and severally liable, as equitable monetary relief; *provided, however*, that this judgment shall be suspended subject to the

1 following conditions;

2 B. Defendants shall pay to the FTC a total of \$1,375,000 in two installments. The
3 first installment of \$1,000,000 shall be paid no later than five (5) days after the date of entry of
4 this Order. The second installment of \$375,000 shall be paid no later than twelve (12) months
5 after the date of entry of this Order. *Provided, however,* that, if, by ten (10) days before the due
6 date of the second installment, defendants have not provided to the Commission documents
7 demonstrating that they have paid \$125,000 to the United States Postal Service ("USPS") in
8 settlement of the USPS matter entitled *In the Matter of the Complaint Against Christal A. Ewing,*
9 *Crystal Ewing, d.b.a. Top Choice, Inc., et al.,* (United States Postal Service, Arlington, VA
10 22201-3078), the amount of the second installment shall be \$500,000. All payments to the
11 Commission shall be made by certified check or other guaranteed funds payable to and delivered
12 to the Commission, or by wire transfer in accordance with directions provided by the
13 Commission, on or before the due dates give above;

14 C. To secure the payment required by Subsection IV. B of this Order, defendants
15 hereby grant to the Commission a lien on and security interest in that certain real property as
16 described in Attachment A to this Order (filed under seal), together with all dwelling houses,
17 other structures, improvements, appurtenances, hereditaments and other rights appertaining or
18 belonging thereto (collectively referred to as the "Collateral"). Defendants represent and
19 acknowledge that the Commission is relying on the material representations that one or more of
20 the defendants are the sole owners in fee simple of the Collateral, that title to the Collateral is
21 marketable, and that the Collateral currently is not encumbered by any other lien, mortgage, deed
22 of trust, assignment, pledge, security interest or other interest except as disclosed to the
23 Commission in the financial statements discussed in Section V of this Order. Defendants
24 represent that none of the encumbrances on the Collateral are in default. Defendants further
25 agree that, as of the date on which they sign this Order, they shall refrain from transferring,
26 converting, encumbering, selling, assigning, or otherwise disposing of the Collateral, except with
27 the express prior written permission of counsel for the Commission. The individual defendants
28

1 hereby release and waive any statutory, common law, or other homestead exemption that may
2 apply to the Collateral and shall not declare and claim any homestead exemption in the
3 Collateral;

4 D. Defendants shall cooperate fully with the Commission and be responsible for
5 preparing, executing, and recording the necessary documents and doing whatever else the
6 Commission deems necessary or desirable to perfect, evidence, and effectuate its liens and
7 security interests granted herein. No later than five (5) days after the date on which the
8 Commission authorizes staff to sign this Order, defendants shall prepare, execute and deliver (at
9 their expense) to the Commission mortgages or deeds of trust in form and substance satisfactory
10 to the Commission (the "Security Documents") and take such other steps as the Commission may
11 require to perfect, evidence, and effectuate its liens, security interests, and assignments and to
12 carry out the purposes of this Order. The Commission shall refrain from recording the Security
13 Documents until after the Court's entry of this Order. In the event that the Court does not enter
14 this Order, within five (5) days after receipt of the Court's denial of this Order the FTC shall
15 return the Security Documents to defendants. Defendants shall be responsible for paying all
16 costs and fees (including attorneys' fees and filing fees) required in connection with the liens and
17 security interests granted herein, including all fees and costs related to the preparation, execution,
18 delivery, filing, continuation and termination of such liens and security interests and to carry out
19 the purposes of this Order;

20 E. Upon defendants' timely and complete satisfaction of the payment required by
21 Subsection IV. B of this Order, the Commission agrees to release the liens and security interests
22 granted herein and defendants shall be responsible for preparing and filing (at their expense) any
23 termination or other statements reasonably required in connection therewith. The Commission
24 shall also promptly release such liens and security interests to the extent necessary to permit the
25 sale or encumbrance of part or all of the Collateral if the proceeds of such sale or financing are
26 remitted directly to the Commission immediately upon closing of such sale or financing in partial
27 or complete satisfaction of this Order and defendants shall pay all fees and costs related to such
28

1 release, including filing fees;

2 F. All funds paid pursuant to this Order shall be deposited into a fund administered
3 by the Commission or its agent to be used for equitable relief, including but not limited to
4 consumer redress, and any attendant expenses for the administration of such equitable relief. In
5 the event that direct redress to consumers is wholly or partially impracticable or funds remain
6 after redress is completed, the Commission may apply any remaining funds for such other
7 equitable relief (including consumer information remedies) as it determines to be reasonably
8 related to the defendants' practices alleged in the Complaint. Any funds not used for such
9 equitable relief shall be deposited to the U.S. Treasury as disgorgement. Defendants shall have
10 no right to challenge the Commission's choice of remedies under this Section. Defendants shall
11 have no right to contest the manner of distribution chosen by the Commission. No portion of any
12 payments under the judgment shall be deemed a payment of any fine, penalty or punitive
13 assessment;

14 G. In the event of any default in any payment or transfer to the Commission set forth
15 in this Section, the amount of \$10,219,664, less the sum of any payments made to the
16 Commission pursuant to this Section, shall become immediately due and payable by defendants,
17 and interest computed pursuant to 28 U.S.C. § 1961, as amended, shall immediately begin to
18 accrue on the unpaid balance; and

19 H. Defendants agree that the facts as alleged in the plaintiff's complaint filed in this
20 action shall be taken as true, without further proof, in any subsequent litigation filed by the
21 Commission to collect any unpaid amount or otherwise enforce its rights pursuant to this Order,
22 including a nondischargeability action filed by or on behalf of the Commission in any bankruptcy
23 case.

24 V. RIGHT TO REOPEN AND TERMINATE SUSPENSION

25 IT IS FURTHER ORDERED that, by agreeing to this Order, defendants reaffirm and
26 attest to the truthfulness, accuracy, and completeness of the financial disclosure forms ("financial
27 statements"), submitted to the Commission on February 6, 2007. Plaintiff's agreement to this
28

1 Order is expressly premised upon the truthfulness, accuracy, and completeness of defendants'
2 financial condition as represented in the financial statements referenced above, which contain
3 material information upon which plaintiff relied in negotiating and agreeing to the terms of this
4 Order. If, upon motion by the Commission, this Court finds that any defendant failed to disclose
5 any material asset, materially misrepresented the value of any asset, or made any other material
6 misrepresentation in or omission from the financial statements, the Court shall enter judgment
7 against the offending defendant, in favor of the Commission, in the amount of \$10,219,664, and
8 the entire amount, less the sum of any payments already made to the Commission, shall become
9 immediately due and payable; *provided, however*, that, in all other respects, this Order shall
10 remain in full force and effect unless otherwise ordered by the Court; and *provided further*, that
11 proceedings instituted under this Section are in addition to and not in lieu of any other civil or
12 criminal remedies as may be provided by law, including any other proceedings the Commission
13 may initiate to enforce this Order.

14 VI. COMPLIANCE REPORTING BY DEFENDANTS

15 **IT IS FURTHER ORDERED** that, in order that compliance with the provisions of this
16 Order may be monitored:

17 A. For a period of three (3) years from the date of entry of this Order,

18 1. Defendants Crystal Ewing and David Ewing each shall notify the
19 Commission of the following:

- 20 a. Any changes in residence, mailing addresses, and telephone
21 numbers, within ten (10) days of the date of such change;
- 22 b. Any changes in employment status (including self-employment)
23 and any change in ownership in any business entity, within ten (10)
24 days of the date of such change. Such notice shall include the
25 name and address of each business each is affiliated with,
26 employed by, creates or forms, or performs services for; a
27 statement of the nature of the business; and a statement of duties
28

1 and responsibilities in connection with the business or
2 employment; and

3 c. Any changes in name or use of any aliases or fictitious names;

4 2. Defendants shall notify the Commission of any changes in the corporate
5 structure of the corporate defendants or any business entity that either defendant Crystal
6 Ewing or David Ewing directly or indirectly controls, or has an ownership interest in, that
7 may affect compliance obligations arising under this Order including, but not limited to, a
8 dissolution, assignment, sale, merger or other action that would result in the emergence of
9 a successor entity; the creation or dissolution of a subsidiary, parent or affiliate that
10 engages in any acts or practices subject to this Order; the filing of a bankruptcy petition;
11 or a change in the corporate name and address, at least thirty (30) days prior to such
12 change, *provided* that, with respect to any proposed change in the corporation about
13 which defendants learn less than thirty (30) days prior to the date such action is to take
14 place, defendants shall notify the Commission as soon as practicable after obtaining such
15 knowledge;

16 B. One hundred eighty (180) days after the date of entry of this Order, defendants
17 shall provide a written report to the FTC, sworn to under penalty of perjury, setting forth in detail
18 the manner and form in which they have complied and are complying with this Order. This
19 report shall include, but not be limited to:

20 1. For each individual defendant:

- 21 a. The then-current residence address, mailing addresses, and
22 telephone numbers of the defendant;
23 b. The then-current employment and business addresses and
24 telephone numbers of the defendant, a description of the
25 business activities of each such employer or business, and
26 the title and responsibilities of the defendant, for each such
27 employer or business;
28

1 c. Any other changes required to be reported under
2 subparagraph A of this Section;

3 2. For all defendants:

- 4 a. A copy of each acknowledgment of receipt of this Order
5 obtained pursuant to Section IX of this Order; and
6 b. Any other changes required to be reported under
7 subparagraph A of this Section;

8 C. For the purposes of this Order, defendants shall, unless otherwise directed by the
9 Commission's authorized representatives, mail all written notifications to the Commission to:

10 Associate Director of Enforcement
11 Federal Trade Commission
12 601 New Jersey Ave., N.W.
13 Washington, DC 20001
14 *Re: FTC v. Crystal A. Ewing, et. al.*, [court filing number]

14 VII. COMPLIANCE MONITORING

15 **IT IS FURTHER ORDERED** that, for the purpose of monitoring and investigating
16 compliance with any provision of this Order:

17 A. Within ten (10) days of receipt of written notice from a representative of the
18 Commission, each defendant shall submit additional written reports, sworn to under penalty of
19 perjury; produce documents for inspection and copying; appear for deposition; and/or provide
20 entry during normal business hours to any U.S. business location in such defendant's possession,
21 or direct or indirect control, to inspect the business operation;

22 B. In addition, the Commission is authorized to monitor compliance with this Order
23 by all other lawful means including, but not limited to, the following:

- 24 1. Obtaining discovery from any person, without further leave of court, using
25 the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45; and
26 2. Posing as consumers and suppliers to defendants, defendants' employees,
27 or any other entity managed or controlled, in whole or in part, by defendants, without the
28

1 necessity of identification or prior notice; and

2 C. Defendants shall permit representatives of the Commission to interview any
3 employer, consultant, independent contractor, representative, agent or employee who has agreed
4 to such an interview, relating in any way to any conduct subject to this Order. The person
5 interviewed may have counsel present.

6 *Provided, however,* that nothing in this Order shall limit the Commission's lawful use of
7 compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49 and 57b-1,
8 to obtain any documentary material, tangible things, testimony, or information relevant to unfair
9 or deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C.
10 § 45(a)(1)).

11 **VIII. RECORD KEEPING**

12 **IT IS FURTHER ORDERED** that, for a period of six (6) years from the date of entry of
13 this Order, defendants, in connection with any business where (1) any defendant is the majority
14 owner, or directly or indirectly manages or controls the business, and (2) the business is engaged
15 in advertising, promoting, or offering for sale any good or service through the mail (including the
16 United States Postal Service or any private delivery service), or in assisting others engaged in
17 such conduct, are hereby restrained and enjoined from failing to create and retain the following
18 records:

19 A. Accounting records that reflect the cost of goods or services sold, revenues
20 generated, and the disbursement of such revenues;

21 B. Personnel records accurately reflecting: the name, address, and telephone number
22 of each person employed in any capacity by such business, including as an independent
23 contractor; that person's job title or position; the date upon which the person commenced work;
24 and the date and reason for the person's termination, if applicable;

25 C. Customer files containing the names, addresses, telephone numbers, dollar
26 amounts paid, quantity of items or services purchased, and description of items or services
27 purchased, to the extent such information is obtained in the ordinary course of business;
28

1 D. Complaints and refund requests (whether received directly, indirectly or through
2 any third party) and any responses to those complaints or requests;

3 E. Copies of all sales scripts, training materials, advertisements or other marketing
4 materials; and

5 F. All records and documents necessary to demonstrate full compliance with each
6 provision of this Order including, but not limited to, copies of acknowledgments of receipt of this
7 Order required by Section IX of this Order, and all reports submitted to the FTC pursuant to
8 Section VII of this Order.

9 **IX. DISTRIBUTION OF ORDER BY DEFENDANTS**

10 **IT IS FURTHER ORDERED** that, for a period of three (3) years from the date of entry
11 of this Order, defendants shall deliver copies of this Order as directed below:

12 A. Corporate defendants must deliver a copy of this Order to all of their principals,
13 officers, directors, and managers. Corporate defendants also must deliver copies of this Order to
14 all of their employees, agents, and representatives who engage in conduct related to the subject
15 matter of this Order. For current personnel, delivery shall be made within five (5) days of service
16 of this Order upon defendants. For new personnel, delivery shall occur prior to assumption of
17 responsibilities;

18 B. For any business that defendant Crystal Ewing or David Ewing controls, directly
19 or indirectly, or in which either has a majority ownership interest, said defendant must deliver a
20 copy of this Order to all principals, officers, directors, and managers of that business. Said
21 defendant must also deliver copies of this Order to all employees, agents, and representatives of
22 that business who engage in conduct related to the subject matter of this Order. For current
23 personnel, delivery shall be within five (5) days of service of this Order upon defendant. For new
24 personnel, delivery shall occur prior to assumption of responsibilities;

25 C. For any business where defendant Crystal Ewing or David Ewing is not a
26 controlling person of a business, but otherwise engages in advertising, promoting, or offering for
27 sale any good or service through the mail (including the United States Postal Service or any
28

private delivery service), said defendant must deliver a copy of this Order to all principals and managers of such business before engaging in such conduct; and

D. Defendants must secure a signed and dated statement acknowledging receipt of this Order, within thirty (30) days of delivery, from all persons receiving a copy of the Order pursuant to this Section.

X. ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that each defendant, within five (5) business days of receipt of this Order as entered by the Court, must submit to the Commission a truthful sworn statement acknowledging receipt of this Order.


XI. 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 _____ day of _____, 2007.

[Name of judge]

UNITED STATES DISTRICT JUDGE

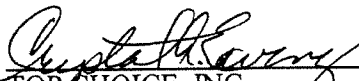

KATHRYN C. DECKER
915 Second Avenue, Suite 2896
Seattle, WA 98174
206-220-4486
206-220-6366 (fax)
kdecker@ftc.gov


Attorney for Plaintiff
Federal Trade Commission



SEAN K. MCELHENNY
Bryan Cave LLP
One Renaissance Square
Two North Central Ave., Suite 2200
Phoenix, AZ 85004-4406
602-364-7000
602-364-7070 (fax)

Attorney for Defendants

1
2
3 
4 CRYSTAL A. EWING, Individually

5
6 
7 TOP CHOICE, INC.,
8 by Crystal A. Ewing, President

9 
10 CLASSIC PRODUCTIONS, LLC,
11 by Crystal A. Ewing, Manager

12 
13 RESPONSE PROCESSING, LLC,
14 by Crystal A. Ewing, Manager

15 
16 DAVID F. EWING, Individually

17 
18 CONSUMER DIRECT ENTERPRISES, LLC
19 by David F. Ewing, Manager
20
21
22
23
24
25
26
27
28