UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

FEDERAL TRADE COMMISSION, and PEOPLE OF THE STATE OF NEW YORK, by ERIC T. SCHNEIDERMAN, Attorney General of the State of New York, Plaintiffs,	Case No. 15-CV-875-A TEMPORARY RESTRAINING ORDER
v.	
KELLY S. BRACE, individually and as an officer of one or more of the Corporate Defendants; BRACLAIRE MANAGEMENT, LLC, a New York limited liability company, also d/b/a CLEAR CREDIT SERVICES, also d/b/a CLEAR CREDIT SOLUTIONS, and also d/b/a DELAWARE SOLUTIONS; CREDIT CLEAR SOLUTIONS, LLC, a California limited liability company; SOLIDUS GROUP, LLC, a New York limited liability company; SOLIDUS SOLUTIONS, LLC, a New York limited liability company,	
Defendants, and	

JOELLE J. LECLAIRE,

Relief Defendant.

Plaintiffs Federal Trade Commission ("FTC") and The People of the State of New York ("State of New York," and, collectively with the FTC, "Plaintiffs") have filed a complaint seeking a permanent injunction and other equitable relief, pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), Section 814(a) of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692*l*(a), N.Y. Executive Law § 63(12), and N.Y. General Business Law Articles 22-A, § 349, and 29-H, § 602, and a motion for temporary restraining order ("TRO" or "Order") pursuant to Rule 65(b) of the Federal Rules of Civil Procedure.

FINDINGS OF FACT

This Court, having considered the Complaint, exhibits, suggestions, declarations, and other submissions finds that:

- A. This Court has jurisdiction over the subject matter of this case, there is good cause to believe it will have jurisdiction over all the parties hereto, and venue in this district is proper;
- B. There is good cause to believe that Defendants Braclaire Management, LLC; Clear Credit Services, LLC; Credit Clear Solutions, LLC; Delaware Solutions, LLC; Solidus Group, LLC; Solidus Solutions, LLC; and Kelly S. Brace have engaged and are likely to continue to engage in acts or practices that violate Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), the FDCPA, 15 U.S.C. §§ 1692 1692p, New York Executive Law § 63(12), and New York General Business Law §§ 349 and 601, and that Plaintiffs are therefore likely to prevail on the merits of this action;
- C. There is good cause to believe that consumers will suffer immediate and continuing harm from Defendants' ongoing violations of Section 5(a) of the FTC Act, the FDCPA, New York Executive Law, and New York General Business Law, unless Defendants are restrained and enjoined by Order of this Court;
- D. There is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief for consumers in the form of monetary restitution and/or disgorgement of ill-gotten gains will occur from the transfer, dissipation, or concealment by Defendants of their assets or business records unless Defendants are immediately restrained and enjoined by Order of this Court;

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- E. Good cause exists for permitting Plaintiffs immediate access to Defendants' business premises, and permitting Plaintiffs to take expedited discovery;
- F. Weighing the equities and considering Plaintiffs' likelihood of ultimate success, a temporary restraining order with an asset freeze, immediate access to business premises, expedited discovery as to the existence and location of assets and documents, and other equitable relief is in the public interest; and
- G. No security is required of any agency of the United States for issuance of a TRO, Fed. R.Civ. P. 65(c).

DEFINITIONS

- A. "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including, without limitation, chattels, goods, instruments, equipment, fixtures, general intangibles, leaseholds, mail or other deliveries, inventory, checks, notes, accounts, credits, contracts, receivables, shares of stock, and all cash, wherever located.
- B. "Corporate Defendants" means Defendants Braclaire Management, LLC; Clear Credit Services, LLC; Credit Clear Solutions, LLC; Delaware Solutions, LLC; Solidus Group, LLC; Solidus Solutions, LLC, and their successors, assigns, affiliates, or subsidiaries, and each of them by whatever names each might be known.
- C. "**Debt**" means any obligation or alleged obligation to pay money arising out of a transaction, whether or not such obligation has been reduced to judgment.
- D. "Defendants" means the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination, and each of them by whatever names each might be known.

- E. "Document" and "Electronically Stored Information" are synonymous in meaning and equal in scope to the usage of the terms in Rule 34(a) of the Federal Rules of Civil Procedure, and include but are not limited to:
 - i. The original or a true copy of any written, typed, printed, electronically stored, transcribed, taped, recorded, filmed, punched, or graphic matter or other data compilations of any kind, including, but not limited to, letters, email or other correspondence, messages, memoranda, interoffice communications, notes, reports, summaries, manuals, magnetic tapes or discs, tabulations, books, records, checks, invoices, work papers, journals, ledgers, statements, returns, reports, schedules, or files; and
 - ii. Any electronically stored information stored on any server, or any type of mobile device, flash drives, personal digital assistants, desktop personal computer and workstations, laptops, notebooks, and other portable computers, or other electronic storage media, whether assigned to individuals or in pools of computers available for shared use, or personally owned but used for work-related purposes; backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether stored onsite with the computer used to generate them, stored offsite in another company facility, or stored, hosted, or otherwise maintained offsite by a third-party; and computers and related offline storage used by Defendants or Defendants' participating associates, which may include persons who are not employees of the company or who do not work on company premises.

- F. **"Electronic Data Host"** means any person or entity in the business of storing, hosting, or otherwise maintaining electronically stored information.
- G. "**Financial Institution**" means any bank, savings and loan institution, credit union, or any financial depository of any kind, including, but not limited to, any brokerage house, trustee, broker-dealer, escrow agent, title company, commodity trading company, or precious metal dealer.
- H. "Individual Defendant" means Kelly S. Brace.
- I. "**Person**" means a natural person, an organization or other legal entity, including a corporation, partnership, sole proprietorship, association, cooperative, or any other group or combination acting as an entity.
- J. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessaryto make the applicable phrase or sentence inclusive rather than exclusive.

ORDER

PROHIBITED REPRESENTATIONS AND DEBT COLLECTION ACTIVITIES

I. IT IS THEREFORE ORDERED that in connection with the collection or the attempted collection of any debt, Defendants and their successors, assigns, members, officers, agents, employees, and attorneys, and those persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, are hereby temporarily restrained and enjoined from:

- A. Misrepresenting, or assisting others who are misrepresenting, expressly or by implication, orally or in writing, any of the following:
 - 1. that Defendants' debt collectors are process servers;

- 2. that Defendants' debt collectors are law enforcement officials;
- that Defendants' debt collectors are attorneys or representatives of an attorney, or that a communication is from an attorney;
- 4. that Defendants will serve, or arrange for a third party to serve, documents on a consumer;
- 5. that consumers have committed fraud or a criminal act;
- that Defendants have filed, or intend to file, a lawsuit against the consumer for failing to pay a purported debt;
- that non-payment of a purported debt will result in a consumer's arrest,
 criminal prosecution, or imprisonment; or
- 8. the character, amount, or legal status of a debt;
- B. Communicating with any person other than the consumer, the consumer's attorney, a consumer reporting agency if otherwise permitted by law, the creditor, the attorney of the creditor, the attorney of the debt collector, the consumer's spouse, parent (if the consumer is a minor), guardian, executor, or administrator for purposes other than acquiring location information about a consumer, without having obtained directly the prior consent of the consumer or the express permission of a court of competent jurisdiction, and when not reasonably necessary to effectuate a post-judgment judicial remedy;
- C. Threatening to take action that Defendants do not intend to take, such as filing a lawsuit or threatening to disclose debts to third parties;
- D. Disclosing or threatening to disclose information concerning the existence of a debt known to be disputed by the debtor without disclosing that fact;

- E. Using any false representation or deceptive means to collect or attempt to collect a debt, or to obtain information concerning a consumer;
- F. Failing to disclose or disclose adequately in the initial communication with a consumer that any Defendant or any other person is a debt collector attempting to collect a debt and that any information obtained will be used for that purpose, or failing to disclose in subsequent communications that the communication is from a debt collector;
- G. Failing to provide consumers, within five days after the initial communication with a consumer, a written notice containing: (1) the amount of the debt; (2) the name of the creditor to whom the debt is owed; (3) a statement that unless the consumer, within thirty days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by Defendants; (4) a statement that if the consumer notifies Defendants in writing within the thirty-day period that the debt, or any portion thereof, is disputed, Defendants will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by Defendants; and (5) a statement that, upon the consumer's written request within the thirty-day period, Defendants will provide the consumer with the name and address of the original creditor, if different from the current creditor;
- H. Collecting or attempting to collect a debt from a consumer without a reasonable basis for believing that the consumer owes the debt and in the amount demanded; and

I. Engaging in any other conduct that violates the FDCPA, 15 U.S.C. §§ 1692 1692p, or New York General Business Law § 601.

ASSET FREEZE

II. IT IS FURTHER ORDERED that Defendants are hereby temporarily restrained and enjoined from directly or indirectly:

- A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any assets, or any interest therein, wherever located, including outside the United States, that are:
 - owned or controlled, directly or indirectly, by any Defendants, in whole or in part, or held, in whole or in part, for the benefit of any Defendants;
 - 2. in the actual or constructive possession of any Defendants;
 - owned by, controlled by, or in the actual or constructive possession of any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by, or under common control with any Defendants; or
 - 4. held by, for, or under the name of any Defendants at any bank or savings and loan institution, or with any broker-dealer, escrow agent, title company, commodity trading company, payment processing company, precious metal dealer, or other financial institution or depository of any kind;

- B. Opening or causing to be opened any safe deposit boxes titled in the name of any Defendants, or subject to access by any Defendants;
- C. Incurring charges or cash advances on any credit card, debit card, or checking card issued in the name, singly or jointly, of any Defendants;
- D. Obtaining a personal or secured loan; and
- E. Incurring liens or encumbrances on real property, personal property or other assets in the name, singly or jointly, of any Defendants.

Provided, however, that the Corporate Defendants may transfer assets to persons and entities that are not any of the Defendants or any business which any Defendants have a beneficial or legal interest, if those transfers are made as payment for:

- A. compensation due to current employees, other than the Individual Defendant, as provided by currently existing agreements between the Corporate Defendants and those employees;
- B. rent for currently existing business premises according to leases that are currently in effect;
- C. utilities, telecommunications service, internet service, and electronic data hosting for currently existing business premises; and
- taxes due to the United States, the State of New York, or any political subdivision of the State of New York.

The assets affected by this Section shall include: (1) all assets of Defendants as of the time this Order is entered; and (2) for assets obtained after the time this Order is entered, those assets that are obtained from any debt-collection activities that predate the entry of this Order. This Section does not prohibit the repatriation of foreign Assets, as specifically required in Section VII (Repatriation of Foreign Assets) of this Order.

RETENTION OF ASSETS AND RECORDS BY FINANCIAL INSTITUTIONS AND OTHER THIRD PARTIES

III. IT IS FURTHER ORDERED that any financial or brokerage institution or depository, escrow agent, title company, commodity trading company, trust, entity, electronic data host, or person that holds, controls, or maintains custody of any account, document, electronically stored information, or asset owned or controlled, directly or indirectly, by any Defendants, or has held, controlled, or maintained any account, document, electronically stored information, or asset of, or on behalf of, any Defendants, upon service with a copy of this Order, shall:

- A. Hold, preserve, and retain within its control and prohibit Individual Defendant and Defendants Solidus Solutions, LLC and Solidus Group, LLC from withdrawing, removing, assigning, transferring, pledging, encumbering, disbursing, dissipating, converting, selling, gifting, or otherwise disposing of any accounts, documents, electronically stored information, assets, funds, or other property that are owned by, held in the name of, for the benefit of, or otherwise controlled by, directly or indirectly, Individual Defendant and Defendants Solidus Solutions, LLC and Solidus Group, LLC, in whole or in part, except for accounts held in the names of Braclaire Management, LLC and Credit Clear Solutions, LLC, or as directed by further order of the Court;
- B. Provide the Plaintiffs and Plaintiffs' agents expedited access to electronically stored information stored, hosted, or otherwise maintained on behalf of any Defendants for forensic imaging;

- Deny the Defendants access to any safe deposit box titled in the name of any Defendants, individually or jointly, or subject to access by any Defendants, whether directly or indirectly;
- D. Provide counsel for Plaintiffs, within one (1) business day of receipt of this Order, a certified statement setting forth:
 - the identification number of each such account or asset titled (1) in the name, individually or jointly, of any Defendants; (2) held on behalf of, or for the benefit of, any Defendants; (3) owned or controlled by any Defendants; or (4) otherwise subject to access or use by any Defendants, directly or indirectly;
 - 2. the balance of each such account, or a description of the nature and value of such asset as of the close of business on the day on which this Order is served, and, if the account or other asset has been closed or removed, the date closed or removed, the total funds removed in order to close the account, and the name of the person or entity to whom such account or other asset was remitted;
 - 3. the identification of any safe deposit box that is either titled in the name of any Defendants, or is otherwise subject to access by any Defendants; and
 - 4. if an account, safe deposit box, or other asset has been closed or removed, the date closed or removed, the balance on such date, and the name of the person or entity to whom such account or other asset was remitted; and
- E. Provide counsel for Plaintiffs, within three (3) business days after being served with a request, copies of all documents pertaining to such account or asset,

including but not limited to originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs; provided that such institution or custodian may charge a reasonable fee.

PRESERVATION OF DOCUMENTS HELD BY THIRD PARTIES

IV. IT IS FURTHER ORDERED that Defendants, their Representatives, and any other person or entity who receives actual notice of this Order, whether acting directly or indirectly, are hereby temporarily restrained and enjoined from destroying, concealing, altering, transferring, or otherwise disposing of, in any manner, documents that relate to: (1) Defendants' business practices, assets, telephone account records, and email account records; (2) any webpage or website operated, in whole or in part, on any Defendants' behalf; and (3) any electronic communications sent or received by the Defendants, including but not limited to emails, recordings of telephone conversations, and voicemail recordings.

FINANCIAL STATEMENTS AND ACCOUNTING

V. IT IS FURTHER ORDERED that each Defendant, within three (3) business days of service of this Order, shall prepare and deliver to counsel for Plaintiffs:

- A. For the Individual Defendant, a completed financial statement accurate as of the date of service of this Order upon him (unless otherwise agreed upon with Plaintiffs' counsel) on the form of Attachment A to this Order captioned, "Financial Statement of Individual Defendant."
- B. For the Corporate Defendants, a completed financial statement accurate as of the
 date of service of this Order upon such Defendants (unless otherwise agreed upon

with Plaintiffs' counsel) in the form of **Attachment B** to this Order captioned, "Financial Statement of Corporate Defendant."

C. For each Defendant, within five (5) days, a completed statement, verified under oath, of all payments, transfers or assignments of funds, assets, or property worth \$2,500 or more since January 1, 2012. Such statement shall include: (a) the amount transferred or assigned; (b) the name of each transferee or assignee; (c) the date of the transfer or assignment; and (d) the type and amount of consideration paid the Defendant. Each statement shall specify the name and address of each financial institution and brokerage firm at which the Defendant has accounts or safe deposit boxes. Said statements shall include assets held in foreign as well as domestic accounts.

In addition, the Individual Defendant must report, within three (3) days, to Plaintiffs' counsel any change prior to the expiration of this Order in his title or role in any business activity, including any business for which he performs services whether as an employee or otherwise and any entity in which he Defendant has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.

CONSUMER CREDIT REPORTS

VI. IT IS FURTHER ORDERED that Plaintiffs may obtain credit reports concerning any Defendants pursuant to Section 604(a)(1) of the Fair Credit Reporting Act, 15 U.S.C.
§ 1681b(a)(1), and that, upon written request, any credit reporting agency from which such reports are requested shall provide them to Plaintiffs.

REPATRIATION OF FOREIGN ASSETS

VII. IT IS FURTHER ORDERED that, within five (5) business days following the service of this Order, each Defendant shall:

- A. Provide counsel for Plaintiffs with a full accounting of all assets, accounts, funds, and documents outside of the territory of the United States that are held: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;
- B. Transfer to the territory of the United States all assets, accounts, funds, and documents in foreign countries held: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;
- C. Hold and retain all repatriated assets, accounts, funds, and documents, and prevent any transfer, disposition, or dissipation whatsoever of any such assets, accounts, funds, or documents; and
- D. Provide Plaintiffs access to all records of accounts or assets of the Defendants held by financial institutions located outside the territorial United States by signing the Consent to Release of Financial Records attached to this Order as Attachment C.

NON-INTERFERENCE WITH REPATRIATION

VIII. IT IS FURTHER ORDERED that Defendants, and each of their officers, agents, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order, whether acting directly or through any entity, corporation, subsidiary, division, affiliate or other device, are hereby temporarily restrained and enjoined from taking any action, directly or indirectly, which may result in the encumbrance or dissipation of foreign assets, or in the hindrance of the repatriation required by Section IX of this Order, including but not limited to:

- A. Sending any statement, letter, fax, e-mail, or wire transmission, telephoning, or engaging in any other act, directly or indirectly, that results in a determination by a foreign trustee or other entity that a "duress" event has occurred under the terms of a foreign trust agreement, until such time that all assets have been fully repatriated pursuant to Section IX of this Order; and
- B. Notifying any trustee, protector or other agent of any foreign trust, or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a Court Order, until such time that all assets have been fully repatriated pursuant to Section IX.

PLAINTIFFS' IMMEDIATE ACCESS TO BUSINESS PREMISES AND RECORDS

IX. IT IS FURTHER ORDERED that:

- A. Defendants and their officers, agents, directors, employees, salespersons, independent contractors, attorneys, corporations, subsidiaries, affiliates, successors, and assigns, and all other persons or entities in active concert or participation with them, who receive actual notice of this Order, whether acting directly or through any trust, corporation, subsidiary, division, or other device, or any of them, shall, within two hours of receiving service of this Order, identify to Plaintiffs' counsel in writing:
 - 1. All of Defendants' business premises;

- Any non-residence premises where any Defendants conduct business, debt-collection operations, or customer-service operations;
- 3. Any non-residence premises where documents or electronically stored information related to the business, debt-collection operations, or customer-service operations of any Defendants are hosted, stored, or otherwise maintained, including but not limited to the name and location of any electronic data hosts; and
- 4. Any non-residence premises where assets belonging to any Defendants are stored or maintained.
- B. Plaintiffs and their representatives, agents, and assistants shall have immediate access to:
 - all business premises and storage facilities owned, controlled, or used by the Corporate Defendants;
 - 2. any offsite commercial mail boxes used by the Corporate Defendants;
 - all electronic data storage devices owned, controlled, or used by the Corporate Defendants, including servers, computers, tablets, and mobile devices such as cell phones or smartphones; and
 - any non-residence premises where documents related to the Defendants' businesses or assets belonging to any Defendants are stored or maintained.
- C. Plaintiffs are authorized to request the assistance of law enforcement as they deem necessary to effect service and peacefully implement this Order. The FTC may exclude Corporate Defendants and their agents and employees from the business premises during the immediate access. The purpose of the immediate access shall

be to inspect and copy the business and financial records of the Corporate Defendants, including forensic imaging of electronically stored information. Such business records include, but are not limited to, correspondence, contracts, emails, scripts, phone recordings, training materials, employee manuals, consumer complaints, voicemails, disciplinary records, and financial data.

- D. Plaintiffs and their representatives, agents, and assistants shall have the right to remove materials from the above-listed premises for inspection, and copying.
 Plaintiffs and their representatives, agents, and assistants may also photograph or video the inside and outside of all premises to which they are permitted access by this Order, and all documents and other items found on such premises.
- E. Plaintiffs shall return any removed materials to the Corporate Defendants within five business days, or such time as agreed upon by the Plaintiffs and the Corporate Defendants.
- F. The Corporate Defendants shall immediately provide Plaintiffs with any necessary means of access to documents and records, including, without limitation, the locations of the Defendants' business premises, keys and combinations to locks, computer access codes, including passwords, of all computers used to conduct the Corporate Defendants' business, and storage-area access information.
- G. If any documents, computers, or electronic data storage devices, including servers, computers, tablets, and mobile devices such as cell phones or smartphones, containing information related to the business practices or finances of the Corporate Defendants are at a location other than those listed herein,

including but not limited to the personal residences of the Individual Defendant, then, immediately upon notice of this Order, Defendants shall produce to the Plaintiffs all such documents, computers, or electronic data storage devices. In order to prevent the destruction of electronic data, upon service of this Order upon the Corporate Defendants, any computers or electronic data storage devices containing such information shall be powered down (turned off) in the normal course for the operating systems used on such devices and shall not be used until produced for copying and inspection, along with any codes needed for access.

- H. If any documents or electronically stored information that relate to the
 Defendants' business practices or the Corporate Defendants' finances are held by
 third parties, including Internet service providers, Defendants shall instruct any
 such provider to immediately transfer those documents or the electronically stored
 information to Plaintiffs, and shall execute any documents and take any other
 steps necessary to ensure that the documents or electronically stored information
 is transferred.
- I. Within forty-eight (48) hours of service of this Order, the Corporate Defendants shall produce to Plaintiffs a list of all agents, employees, officers, and those persons in active concert and participation with them, who have been associated or done business with the Corporate Defendants.
- J. Plaintiffs' access to the Defendants' documents pursuant to this provision shall not provide grounds for any Defendants to object to any subsequent request for documents served by Plaintiffs.

STAY OF ACTIONS

X. IT IS FURTHER ORDERED that:

- A. Except by leave of this Court, Defendants and all other persons and entities be and hereby are stayed from taking any action to establish or enforce any claim, right, or interest for, against, on behalf of, in, or in the name of, the Corporate Defendants, any of their subsidiaries, affiliates, partnerships, assets, documents, including, but not limited to, the following actions:
 - Commencing, prosecuting, continuing, entering, or enforcing any suit or proceeding, except that such actions may be filed to toll any applicable statute of limitations;
 - 2. Accelerating the due date of any obligation or claimed obligation; filing or enforcing any lien; taking or attempting to take possession, custody, or control of any asset; attempting to foreclose, forfeit, alter, or terminate any interest in any asset, whether such acts are part of a judicial proceeding, are acts of self-help, or otherwise; or
 - 3. Executing, issuing, serving, or causing the execution, issuance, or service of, any legal process, including, but not limited to, attachments, garnishments, subpoenas, writs of replevin, writs of execution, or any other form of process whether specified in this Order or not.
- B. This Section does not stay:
 - 1. The commencement or continuation of a criminal action or proceeding;

- 2. The commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power;
- 3. The enforcement of a judgment, other than a money judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or
- 4. The issuance to a Corporate Defendant of a notice of tax deficiency.

PRESERVATION OF RECORDS AND TANGIBLE THINGS

XI. IT IS FURTHER ORDERED that Defendants and their successors, assigns, officers, agents, employees, and attorneys, and those persons or entities in active concert or participation with any of them who receive actual notice of this Order, whether acting directly or through any corporation, subsidiary, division, or other device, are hereby temporarily restrained and enjoined from destroying, secreting, erasing, mutilating, defacing, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly:

- A. any documents, electronically stored information, or equipment of the Corporate
 Defendants; or
- B. any documents or electronically stored information that relate to the business practices, or business and personal finances, of Defendants or any entity directly or indirectly under the control of Defendants.

These documents include but are not limited to: contracts; agreements; consumer files; consumer lists; consumer addresses and telephone numbers; correspondence, including emails; documents evidencing or referring to Defendants' services; debt-collection training materials; debt-collection scripts; data; computer tapes, disks, or other computerized records; books;

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written or printed records; handwritten notes; telephone logs; "verification" or "compliance" recordings or other audio or video recordings; receipt books; invoices; postal receipts; ledgers; personal and business canceled checks and check registers; bank statements; appointment books; copies of federal, state, or local business or personal income or property tax returns; photographs; mobile devices; electronic storage media; accessories; and any other documents, records, or equipment of any kind that relate to the business practices or business of any Defendants or any other entity directly or indirectly under the control of any Defendants.

LIMITED EXPEDITED DISCOVERY

XII. IT IS FURTHER ORDERED that Plaintiffs are granted leave to conduct certain expedited discovery, and that, commencing with the time and date of this Order, in lieu of the time periods, notice provisions, and other requirements of Rules 26, 30, 34, and 45 of the Federal Rules of Civil Procedure, expedited discovery as to parties and non-parties shall proceed as follows:

A. Plaintiffs may, upon as few as three (3) calendar days' notice, take the deposition of any person or entity, whether or not a party, in any judicial district, for the purpose of discovering: (1) the assets of any Defendants or their affiliates or subsidiaries; (2) the location of documents and other business records; and (3) compliance with this Order. Depositions may be conducted in person, by telephone, or by other remote electronic means. Deposition transcripts that have not been signed by the witness may be used at the preliminary injunction hearing in this matter. *Provided that*, notwithstanding Federal Rule of Civil Procedure 30(a)(2), this Section shall not preclude any future depositions by Plaintiffs. *Provided further*, that any deposition taken pursuant to this Section shall be in

addition to, and not subject to, the presumptive limits on depositions set forth in Federal Rule of Civil Procedure 30(a)(2)(A).

- B. Plaintiffs may serve interrogatories for the purpose of discovering: (1) the assets of Defendants or their affiliates or subsidiaries; (2) the location of documents; and (3) compliance with this Order. Defendants shall respond within five (5) calendar days after Plaintiffs serve such interrogatories. *Provided that*, notwithstanding Federal Rule of Civil Procedure 33(a)(1), this Subsection shall not preclude any future interrogatories by Plaintiffs.
- C. Plaintiffs may, upon three (3) calendar days' notice to any Defendants and upon five (5) calendar days' notice to non-parties, including through the use of a Rule 45 Subpoena, demand the production of documents from any person or entity, whether or not a Defendant, relating to: (1) the assets of Defendants or their affiliates or subsidiaries; (2) the location of documents; and (3) compliance with this Order. *Provided that* two (2) business days' notice shall be deemed sufficient for the production of any such documents that are maintained or stored only as electronic data.
- D. Plaintiffs are granted leave to subpoen documents immediately from any financial institution, account custodian, or other entity or person that holds, controls, or maintains custody of any account or asset of any Defendants, or has held, controlled, or maintained custody of any account or asset of any Defendants concerning the nature, location, status, and extent of Defendants' assets, and compliance with this Order, and the entity or person shall respond to such subpoen a within five (5) business days after service.

- E. For purposes of discovery pursuant to this Section, service shall be sufficient if made by personal delivery or by overnight courier.
- F. Plaintiffs may seek to prohibit any Defendants who fail to appear for properly noticed depositions or fail to comply with requests for production or inspection from introducing the evidence sought by Plaintiffs at any subsequent hearing.

SERVICE OF THIS ORDER

XIII. IT IS FURTHER ORDERED that copies of this Order may be served by personal delivery or overnight courier, or U.S. Express Mail, by agents and employees of Plaintiffs or any state or federal law enforcement agency or by private process server, on Defendants or any other persons or entities that may be subject to any provision of this Order.

DISTRIBUTION OF ORDER BY DEFENDANTS

XIV. IT IS FURTHER ORDERED that within three (3) calendar days after service of this Order, Defendants shall provide a copy of this Order to each of their agents, employees, directors, officers, subsidiaries, affiliates, attorneys, independent contractors, representatives, franchisees, and all persons in active concert or participation with Defendants. Within five (5) calendar days following this Order, Defendants shall provide Plaintiffs with an affidavit identifying the names, titles, addresses, and telephone numbers of the persons that Defendants have served with a copy of this Order in compliance with this provision.

CORRESPONDENCE WITH PLAINTIFFS

XV. IT IS FURTHER ORDERED that, for the purposes of this Order, because mail addressed to the FTC is subject to delay due to heightened security screening, all correspondence and service of pleadings on Plaintiff Federal Trade Commission shall be sent either via electronic transmission to Matthew J. Wilshire at mwilshire@ftc.gov or via Federal Express to: Matthew J.

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Wilshire, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Mail Drop CC-10232,
Washington, DC 20580; and service of pleadings on Plaintiff State of New York shall be sent
either via electronic transmission at james.morrissey@ny.ag.gov or via Federal Express to James
M. Morrissey, Assistant Attorney General, 350 Main Street, Ste. 300A, Buffalo, NY 14202;
Facsimile: (716) 853-8414.

ORDER TO SHOW CAUSE AND PRELIMINARY INJUNCTION HEARING

XVI. IT IS FURTHER ORDERED, pursuant to Federal Rule of Civil Procedure 65(b), that Defendants shall appear on the 14th day of October, 2015, at 9:30 a.m., at the United States Courthouse, 2 Niagara Square, Buffalo, New York, 14202, before the Honorable Richard J. Arcara, to show cause, if any there be, why this Court should not enter a preliminary injunction, pending final ruling on the complaint, against Defendants, enjoining them from further violations of the FTC Act, the FDCPA, New York Executive Law Section 63, and New York General Business Law Sections 349 and 601, and imposing such additional relief as may be appropriate.

SERVICE OF PLEADINGS, EVIDENCE, WITNESS LISTS

XVII. IT IS FURTHER ORDERED that:

A. Defendants shall file any answering affidavits, pleadings, or legal memoranda with the Court and serve the same on counsel for Plaintiffs no later than five (5) business days prior to the preliminary injunction hearing in this matter. Plaintiffs may file responsive or supplemental pleadings, materials, affidavits, or memoranda with the Court and serve the same on counsel for Defendants no later than one (1) business day prior to the preliminary injunction hearing in this matter, *provided that* service shall be performed by personal or overnight delivery, facsimile, or e-mail, and documents shall be delivered so that they shall

be received by the other parties no later than 4 p.m. (EST) on the appropriate dates listed in this Subsection;

B. The question of whether this Court should enter a preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining the Defendants during the pendency of this action shall be resolved on the pleadings, declarations, exhibits, and memoranda filed by, and, if necessary, oral argument of, the parties. Live testimony shall be heard only on further order of this Court on motion filed with the Court and served on counsel for the other parties at least five (5) business days prior to the preliminary injunction hearing in this matter. Such motion shall set forth the name, address, and telephone number of each proposed witness, a detailed summary or affidavit disclosing the substance of each proposed witness' expected testimony, and an explanation of why the taking of live testimony would be helpful to this Court. Any papers opposing a timely motion to present live testimony or to present live testimony in response to live testimony presented by another party, shall be filed with this Court and served on the other parties at least three (3) business days prior to the preliminary injunction hearing in this matter, provided that service shall be performed by personal or overnight delivery or by facsimile or e-mail, and documents shall be delivered so that they shall be received by the other parties no later than 4 p.m. (EST) on the appropriate dates listed in this Sub-section.

DURATION OF ORDER

XVIII. IT IS FURTHER ORDERED that the Temporary Restraining Order granted herein shall expire on the 20th day of October, 2015, at 2:00 o'clock p.m., unless within such time, the

Order, for good cause shown, is extended for an additional period not to exceed ten (14) calendar days, or unless it is further extended pursuant to Federal Rule of Civil Procedure 65.

JURISDICTION

XIX. IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes until further order of the Court.

IT IS SO ORDERED, this 6th day of October, 2015, at 200 o'clock....../p.m.

Ruhar J. Gu

RICHARD J. AKCARA UNITED STATES DISTRICT JUDGE

Attachment A

FEDERAL TRADE COMMISSION

FINANCIAL STATEMENT OF INDIVIDUAL DEFENDANT

Definitions and Instructions:

- 1. Complete all items. Enter "None" or "N/A" ("Not Applicable") in the first field only of any item that does not apply to you. If you cannot fully answer a question, explain why.
- "Dependents" include your spouse, live-in companion, dependent children, or any other person, whom you or your spouse (or your children's other parent) claimed or could have claimed as a dependent for tax purposes at any time during the past five years.
- "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or any foreign country or territory, whether held individually or jointly and whether held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.
- 4. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number(s) being continued.
- 5. Type or print legibly.
- 6. Initial each page in the space provided in the lower right corner.
- 7. Sign and date the completed financial statement on the last page.

Penalty for False Information:

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

(1) "in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or devise a material fact; makes any materially false, fictitious or fraudulent statement or representation; or makes or uses any false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or representation; or makes or uses any false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);

(2) "in any ... statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or

(3) "in any (... statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information ... knowing the same to contain any false material declaration" (18 U.S.C. § 1623).

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

3. 314

BACKGROU	ND INFORMATIC	N			
Item 1. Information About You					
Full Name	Social Security No.	a na principa di Salamini da de La Califi d'Alegna de la 1999 de la Califica de Maria de Califica de Salamona d			
Current Address of Primary Residence	Driver's License No.	State Issued			
	Phone Numbers	Date of Birth; / /			
	Home: ()	(mm/dd/yyyy) Place of Birth			
Rent Own From (Date): / /	E-Mail Address				
(mm/dd/yyyy)					
	·				
Previous Addresses for past five years (if required, use addition	al pages at end of form)				
Address		From: / / Until: / / (mm/dd/yyyy) (mm/dd/yyyy)			
		Rent Own			
Address		From: / / Until: / /			
		Rent Own			
Address		From: / / Until: / /			
	·	Rent Own			
Identify any other name(s) and/or social security number(s) you have us	ed and the time period(s)				
Item 2. Information About Your Spouse or Live-In Co Spouse/Companion's Name	mpanion Social Security No.	Date of Birth			
Address (if different from yours)	Phone Number	(mm/dd/yyyy) Place of Birth			
	C)	From (Date): / /			
Identify any other complex and/or copial county pumber(a) you have up		(mm/dd/yyyy)			
Identify any other name(s) and/or social security number(s) you have us	ed and the fills bened(s)				
Employer's Name and Address	Job Title				
	Years in Present Job	Annual Gross Salary/Wages			
		\$			
Item 3. Information About Your Previous Spouse					
Name and Address	angan di kanangan di kanang	Social Security No.			
· · · ·		Date of Birth			
		/ / (mm/dd/yyyy)			
Item 4. Contact Information (name and address of closest livin	ig relative other than your	spouse)			
Name and Address	and a line of the second s	Phone Number			
		()			

Initials:

. ...

Name and Address		Social Secur	rity No.	Date of Birth			
				/ / / (mm/dd/yyyy)			
		Relationship	· · · · · ·	(mm/dd/yyyy)			
Name and Address		Social Secur	rity No.	Date of Birth			
					/ / (mm/dd/yyyy)		
		Relationship					
Name and Address		Social Secur	ity No.	Date of Birth			
			•	/ / (mm/dd/yyyy))		
		Relationship					
Name and Address		Social Secur	rity No.	Date of Birth			
· · · ·	•		· · ·	/ / (mm/dd/yyyy)		
		Relationship					
period. "Income" includes, but is not limited to, any sa royalties, and benefits for which you did not pay (e.g., on your behalf.	health insurance p	premiums, auto	mobile lease or loan pa	ayments) received	by you or anyone else		
Company Name and Address		Dates Employed			ed: Y-T-D & 5 Prior Yrs.		
	From (Month/Year)	To (Month/Year)	Year	Income		
	From (Month/Year) /	To (Month/Year) /	Year 20	Income \$		
		1	1	· .			
		Month/Year) / Month/Year)	To (Month/Year) / To (Month/Year)	· .	\$		
		/ Month/Year)	/ To (Month/Year)	· .	\$		
		/ Month/Year) /	/ To (Month/Year)	· .	\$		
Positions Held		/ Month/Year) / /	/ To (Month/Year)	20	\$ \$ \$ \$ \$		
Positions Held	From (/ Month/Year) / /	/ To (Month/Year) / / /	20	\$		
Positions Held Company Name and Address	From (/ Month/Year) / / / Dates E	/ To (Month/Year) / / / mployed	20 Income Receive	\$ \$ \$ \$ \$ \$ ed: Y-T-D & 5 Prior Yrs.		
Positions Held Company Name and Address Dwnership Interest?	From (/ Month/Year) / / Dates E Month/Year) /	/ To (Month/Year) / / mployed To (Month/Year) /	20 Income Receive Year	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
Positions Held Company Name and Address Dwnership Interest? Yes No Positions Held	From (/ Month/Year) / / Dates E Month/Year)	/ To (Month/Year) / / / mployed	20 Income Receive Year	\$ \$ \$ \$ \$ ed: Y-T-D & 5 Prior Yrs Income \$		
Positions Held Company Name and Address Dwnership Interest?	From (/ Month/Year) / / Dates E Month/Year) /	/ To (Month/Year) / / mployed To (Month/Year) /	20 Income Receive Year	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
Positions Held Company Name and Address Dwnership Interest? Yes No Positions Held	From (/ Month/Year) / / Dates E Month/Year) /	/ To (Month/Year) / / mployed To (Month/Year) /	20 Income Receive Year	\$ \$ \$ \$ \$ ed: Y-T-D & 5 Prior Yrs Income \$		
Positions Heid Company Name and Address Dwnership Interest? Yes No Positions Heid	From (/ Month/Year) / / Dates E Month/Year) / Month/Year) / /	/ To (Month/Year) / / mployed To (Month/Year) /	20 Income Receive Year 20	\$ \$ \$ \$ \$ \$ ed: Y-T-D & 5 Priot Yrs Income \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
Positions Held Company Name and Address Dwnership Interest? Yes No Positions Held	From (/ Month/Year) / / Dates E Month/Year) / Month/Year) / /	/ To (Month/Year) / / mployed To (Month/Year) / To (Month/Year) / / /	20 Income Receive Year 20	\$ \$ \$ \$ \$ \$ ed: Y-T-D & 5 Priot Yrs Income \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
Positions Held Company Name and Address Dwnership Interest? Yes No Positions Held	From () From () From ()	/ Month/Year) / / Dates E Month/Year) / Month/Year) / Dates E Month/Year)	/ To (Month/Year) / / mployed To (Month/Year) / To (Month/Year) / / /	20 Income Receive Year 20 Income Receive	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
Positions Heid Company Name and Address Dwnership Interest? Yes No Positions Heid Company Name and Address	From () From () From ()	/ Month/Year) / / Dates E Month/Year) / Month/Year) / / / Dates E Dates E	/ To (Month/Year) / / mployed To (Month/Year) / To (Month/Year) / / mployed	20 Income Receive Year 20 Income Receive	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
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Positions Heid Company Name and Address Dwnership Interest? Yes No Company Name and Address Company Name and Address Dwnership Interest? Yes No	From (/ Month/Year) / / Dates E Month/Year) / Month/Year) / Dates E Month/Year)	/ To (Month/Year) / / mployed To (Month/Year) / To (Month/Year) / / mployed	20 Income Receive Year 20 Income Receive Year	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		
Ownership Interest? Yes No Positions Held Company Name and Address Ownership Interest? Yes No Positions Held Company Name and Address Ownership Interest? Yes No Positions Held	From (/ Month/Year) / / Dates E Month/Year) / / Dates E Month/Year) / / Month/Year) /	/ To (Month/Year) / / mployed To (Month/Year) / To (Month/Year) / / mployed To (Month/Year) / To (Month/Year)	20 Income Receive Year 20 Income Receive Year	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		

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Caption of Proceeding	Court or Agency and Location	Case No.	Nature of Proceeding	Relief Requested	Status o Dispositio
, a the defining of each of the sec			extre at the control of the		
				· .	
m 8. Safe Deposit Boxes all safe deposit boxes, located w , your spouse, or any of your dep	ithin the United States or in any foreig endents, or held by others for the ben	m country or terr efit of you, your	tory, whether held in Spouse, or any of yo	dividually or jointly and whi ur dependents	sther held b
all safe deposit boxes, located w	ithin the United States or in any foreig	efit of you, your	tory, whether held in	ur dependents.	<u>. 21 24 - 5 2</u>
all safe deposit boxes, located w , your spouse, or any of your dep	ithin the United States or in any foreig endents, or held by others for the ben	efit of you, your	itory, whether held ir spouse, or any of yo	ur dependents.	<u> </u>
all safe deposit boxes, located w , your spouse, or any of your dep	ithin the United States or in any foreig endents, or held by others for the ben	efit of you, your	itory, whether held ir spouse, or any of yo	ur dependents.	<u> </u>
all safe deposit boxes, located w , your spouse, or any of your dep	ithin the United States or in any foreig endents, or held by others for the ben	efit of you, your	itory, whether held ir spouse, or any of yo	ur dependents.	<u>. 21 54 - 52</u>

the United States or in any for spouse, or any of your dependence	FINANCIA isks for information regarding your reign country or territory, or institut dents, or held by others for the be im 24 with your completed Financ	tion, whether held inc nefit of you, your spo	es" include <u>ALL</u> a lividually or jointly	, and wheth	ier held by you, your		
		ASSETS		·····			
accounts, including but not limited	Money Market Accounts cash in bank accounts or other financ d to checking accounts, savings accou ency, uncashed checks, and money of	nts, and certificates of c					
a. Amount of Cash on Hand	\$	Form of Cash on Har	d		· ·		
b. Name on Account	Name & Address of Finan	icial Institution	Accour	nt No.	Current Balance		
			An - Al (An - An 		\$		
				<u>, , , , , , , , , , , , , , , , , , , </u>	\$		
					\$		
	· · · · · · · · · · · · · · · · · · ·			(· · · · ·		
		;			\$		
			ант (1992),		\$		
	Securities including but not limited to, stocks, sto I treasury notes), and state and munic	ipal bonds. Also list an	y U.S. savings bond		ment securities (including		
Broker House, Address	Ł	Issuer Broker Account		Security			
		Current Fair Mar \$	ket Value	Loan(s) A \$	Loan(s) Against Security \$		
Owner of Security	an a	Issuer	Type of	Security	No. of Units Owned		
Broker House, Address	Broker House, Address				1		
		Current Fair Mar \$	ket Value	Loan(s) A \$	gainst Security		
Owner of Security		Issuer		Security	No. of Units Owned		
Broker House, Address	· · · · · · · · · · · · · · · · · · ·	Broker Account			reinet Coovity		
		Current Fair Mar \$	Net Value	\$	gainst Security		

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corporation, and oil or mineral lease.		<u></u>		<u> </u>	<u> </u>		1		
Entity's Name & Address	I ype of Bu Interest (e.g	siness or Fi j., LLC, parti				se) Ownership		o If Officer, Director, Member or Partner, Exact Title	
						·			
							-		
· · ·								,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
tem 12. Amounts Owed to You, Yo	our Spouse, o	r Your De	pendents		18	- Charley and an			
Debtor's Name & Address	Date Obl Incurred (Mo / Current Amo	onth/Year)	Original Amo \$ Payment Sche		judgm		ement, j	result of a final court ovide court name	
en e	\$		\$		-				
Debtor's Telephone	Debtor's Rel	ationship to	You						
Debtor's Name & Address	Date Ob Incurred (M		Original Amo \$	unt Owed	d Nature of Obligation (if the result of a fir judgment or settlement, provide court n and docket number)				
	Current Amo \$	unt Owed	Payment Sch \$	edule					
Debtor's Telephone	Debtor's Rel	ationship to	You		H .				
tem 13. Life Insurance Policies ist all life insurance policies (including endowi	ment policies) with	any cash si	rrender value.						
nsurance Company's Name, Address, & Teler	phone No.	Beneficia	γ		Polic	cy No.		Face Value \$	
	•	Insured			Loans Against Polic		Policy	Surrender Value \$	
nsurance Company's Name, Address, & Teler	phone No.	Beneficia	у	<u> </u>			Face Value \$		
		Insured			Loans Against Policy		surrender Value \$		
tem 14. Deferred Income Arranger ist all deferred income arrangements, includin ther retirement accounts, and college savings	ig but not limited to), deferred a	nnuities, pensic	ns plans, pl	rofit-shar	ing plans,	401(k) p	l lans, IRAs, Keoghs,	
rustee or Administrator's Name, Address & To	and a second	Intro/	Name on Acco	ount	<u>. 13 (1)(1)</u>	Ac	count N	lo.	
			Date Establish	ed Typ	e of Plan	8		der Value before and Penalties	
		(mm/dd/yyyy) Name on Account		\$ Account No.		0.			
rustee or Administrator's Name, Address & T	rustee or Administrator's Name, Address & Telephone No.					1			

Initials:

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		surance Payments or Inherita payments or inheritances owed to you						
Туре				Amount Expecte	d Date E	Expected (mm/dd/yyyy)		
			-	\$ <u>.</u>	/	1		
		<u> </u>		\$	1	/		
				\$	/			
		cles, boats, airplanes, and other vehic	les.	i <u>i se </u>	Arbonano arre erre ar			
Vehicle Type	Year	Registered Owner's Name	Purchase Price \$	Original Loan A \$	\$	urrent Balance		
Make		Registration State & No.	Account/Loan No.	Current Value \$	M \$	onthly Payment		
Model		Address of Vehicle's Location	Lender's Name and Add	ress		_		
Vehicle Type	Year	Registered Owner's Name	Purchase Price \$	Original Loan A \$	mount C \$	urrent Balance		
Make		Registration State & No.	Account/Loan No.	Current Value \$		onthly Payment		
Model		Address of Vehicle's Location	Lender's Name and Add	ress		· .		
Vehicle Type	Year	Registered Owner's Name	Purchase Price	Original Loan Amou \$	nt Cu	Current Balance .		
Make		Registration State & No.	Account/Loan No.	Current Value \$	Mc \$	Monthly Payment		
Model	•	Address of Vehicle's Location	Lender's Name and Add	ress	<i>.</i> .			
Vehicle Type	Year	Registered Owner's Name	Purchase Price \$	Original Loan Amou	nt Cu s	Current Balance		
Make		Registration State & No.	Account/Loan No.	Current Value		Monthly Payment		
Model		Address of Vehicle's Location	Lender's Name and Add			· · · · · · · · · · · · · · · · · · ·		
List all other per	sonal prope	mal Property rty not listed in items 9-16 by category work, gemstones, jewelry, bullion, othe	/, whether held for personal er collectibles, copyrights, p	use, investment or any o atents, and other intellect	ther reason, ual property	including but not		
Property Cal (e.g., artwork,	legory jewelry)	Name of Owner	Property Locati	on Acqu	isition Cost	Current Value		
				\$	ant and a constraint	\$		
				\$		\$		
				\$	X 1 2000	\$		

	······································			<u></u>			
Item 18. Real Property List all real property interests (includir					· ·		
Property's Location	Type of Property		Name(s) on Title or Contract and Ownership Percentages				
			· ·				
					() (-), -, -), -, -, -, -, -, -, -, -, -, -, -, -, -,		
Acquisition Date (mm/dd/yyyy) F / / \$	Purchase Price		S	Basis o	of Valuation		
Lender's Name and Address		oan or Ac			t Balance On First Mortgage or		
				Contrac \$			
					y Payment		
Other Mortgage Loan(s) (describe)			ly Payment	\$	sent i tarià		
omer worigage Loan(s) (describe)		\$	iy nayment	_	ital Unit		
		Currer	nt Balance		y Rent Received		
Property's Location	Type of Property	\$	Name(s) on Title or (\$ Contract and Ow	mership Percentages		
risporty a counton	- Type of Troperty						
	Purchase Price	· · · · · · · · · · · · · · · · · · ·	Current Value	Basis c	of Valuation		
/ / \$ Lender's Name and Address		oan or Aci	\$	Curren	t Balance On First Mortgage or		
CONTER S MEETIE GHU MUUICSS				Contra			
				\$ Monthle	\$ Monthly Payment		
	• •		a - 2 - 52 - 1 	\$			
Other Mortgage Loan(s) (describe)			ly Payment	🗌 Ren	Rental Unit		
		\$ Currer	nt Balance	Month	Monthly Rent Received		
		\$.		\$			
		LI	ABILITIES				
Item 19. Credit Cards List each credit card account held by whether issued by a United States or	you, your spouse, or you foreign financial institutio	ur dependi on.	ents, and any other credit c	ards that you, yo	our spouse, or your dependents use,		
Name of Credit Card (e.g., Visa, MasterCard, Department Store)	Account No	0.		on Account	Current Balance		
					\$		
					<u>\$</u>		
					\$		
					\$		
Item 20. Taxes Payable List all taxes, such as income taxes o	r real estate taxes, owed	í by you, y	our spouse, or your depen	dents.	ана <u>н алаан ала</u> Ал		
Type of Ta	Χ		Amount Owed		Year Incurred		
		\$					
		\$					
, 		\$, 		



0 Federal Trade Commission Financial Statement of Individual Defendant

Initials:

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Item 21. Other Amounts Ow List all other amounts, not listed elsev						r your depende	ents			
Lender/Creditor's Name, Address, an	d Telephor	ne No. Nature of D number)	Nature of Debt (if the result of a court judgment or settlement, provide court name and docket number)							
	Lender/Cre	Lender/Creditor's Relationship to You								
Date Liability Was Incurred	Original A	Amount Owed	t Owed Current Amount Owed			d	Payment Schedule			
(mm/dd/yyyy) Lender/Creditor's Name, Address, an	ne No. Nature of D number)	Nature of Debt (if the result of a court judgment or settlement, provide court name and docket								
		Lender/Cre	ditor's R	elationsh	ip to You					
Date Liability Was Incurred / / (mm/dd/yyyy)	Original A \$	Amount Ówed		Current \$	Amount Owe	d	Paymer	nt Schedule		
		OTHER FIN	ANCIA		ORMATIC	DN		,		
Item 22. Trusts and Escrow List all funds and other assets that are retainers being held on your behalf by dependents, for any person or entity.	e being hel legal cour									
Trustee or Escrow Agent's Name &	Address	Date Established (mm/dd/yyyy)	Grant		tor Beneficiaries		Present Market Value of Assets*			
		. / /								
· · · ·					Martine		\$			
) /	,	\$			\$	\$		
*If the market value of any asset is un	known, de	scribe the asset and	state its	cost, if ye	ou know it.					
Item 23. Transfers of Assets List each person or entity to whom yo loan, gift, sale, or other transfer (exclu entity, state the total amount transfer	u have trar Ide ordinar	y and necessary livir			xpenses paid					
Transferee's Name, Address, & Rela	tionship	Property Transfe	erred	Aggreç	pate Value*	Transfer Date (mm/dd/yyyy)		Type of Transfer (e.g., Loan, Gift)		
				\$		11		· · ·		
	-			\$		/ /				
				\$		1 1				
*If the market value of any asset is un	known, de	scribe the asset and	state its	cost, if yo	bu know it.					

Initials:

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	Federal tax returns filed during the last three years by or on behalf of you, your spouse, or your dependents.
	All applications for bank loans or other extensions of credit (other than credit cards) that you, your spouse, or your dependents have submitted within the last two years, including by obtaining copies from lenders if necessary.
Item 9	For each bank account listed in Item 9, all account statements for the past 3 years.
Item 11	For each business entity listed in Item 11, provide (including by causing to be generated from accounting records) the most recent balance sheet, tax return, annual income statement, the most recent year-to-date income statement, and all general ledger files from account records.
Item 17	All appraisals that have been prepared for any property listed in Item 17, including appraisals done for insurance purposes. You may exclude any category of property where the total appraised value of all property in that category is less than \$2,000.
item 18	All appraisals that have been prepared for real property listed in Item 18.
Item 21	Documentation for all debts listed in Item 21.
Item 22	All executed documents for any trust or escrow listed in Item 22. Also provide any appraisals, including insurance appraisals that have been done for any assets held by any such trust or in any such escrow.

SUMMARY FINANCIAL SCHEDULES

Item 25. Combined Balance Sheet for You, Your Spouse, and Your Dependents

Assets Cash on Hand (Item 9) S		Liabilities	Liabilities	
		Loans Against Publicly Traded Securities (Item 10)	\$	
Funds Held in Financial Institutions (Item 9)	\$	Vehicles - Liens (Item 16)	\$	
U.S. Government Securities (Item 10)	\$	Real Property – Encumbrances (Item 18)	\$	
Publicly Traded Securities (Item 10)	\$	Credit Cards (Item 19)	\$	
Non-Public Business and Financial Interests (Item 11)	\$	Taxes Payable (Item 20)	\$	
Amounts Owed to You (Item 12)	\$	Amounts Owed by You (Item 21)	\$	
Life Insurance Policies (Item 13)	\$	Other Liabilities (Itemize)		
Deferred Income Arrangements (Item 14)	\$		\$	
Vehicles (Item 16)	\$		\$	
Other Personal Property (Item 17)	\$		\$	
Real Property (Item 18)	\$		\$	
Other Assets (Itemize)			\$	
	\$		\$	
	\$		\$	
\$			\$	
Total Assets	Total Assets \$		\$	

Item 26. Combined Current Monthly Income and Expenses for You, Your Spouse, and Your Dependents Provide the current monthly income and expenses for you, your spouse, and your dependents. Do not include credit card payments separately, rather,

include credit card expenditures in the appropriate categories.

Income (State source of each item)		Expenses		
Salary - After Taxes		Mortgage or Rental Payments for Residence(s)	¢	
Source:	\$		ъ	
Fees, Commissions, and Royalties		Property Taxes for Residence(s)	ø	
Source:	\$		Þ	
Interest	•	Rental Property Expenses, Including Mortgage Payments, Taxes,		
Source:	¢ ا	and Insurance	\$	
Dividends and Capital Gains	r.	Car or Other Vehicle Lease or Loan Payments	¢.	
Source:	Þ		Ф	
Gross Rental Income	¢	Food Expenses		
Source:	\$		Þ	
Profits from Sole Proprietorships		Clothing Expenses	¢	
- Source:	\$	1	\$	
Distributions from Partnerships, S-Corporations,		Utilities		
and LLCs	\$.	1	\$.	
Source:				

Initials:

0 Federal Trade Commission Financial Statement of Individual Defendant

Item 26. Combined Current Monthly Inc	come an	d Expenses for You, Your Spouse, and Your	Dependents (cont.)
Distributions from Trusts and Estates \$		Medical Expenses, Including Insurance	\$
Distributions from Deferred Income Arrangements Source:	\$	Other Insurance Premiums	\$
Social Security Payments	\$	Other Transportation Expenses	\$
Alimony/Child Support Received	\$	Other Expenses (Itemize)	
Gambling Income	\$		\$
Other Income (Itemize)			\$
<u>, , , , , , , , , , , , , , , , , , , </u>	\$	•	\$
	\$	· · · · · · · · · · · · · · · · · · ·	\$
	\$		\$
Total Income	\$	Total Expenses	\$
		ATTACHMENTS	
Item 27. Documents Attached to this F List all documents that are being submitted with this		Statement atement. For any Item 24 documents that are not attached,	explain why
Item No. Document Relates To		Description of Document	· .
·			· · · · · · · · · · · · · · · · · · ·
		······································	
		, με το τράπου το	
	<u></u>	a an	
		и то слам и додина, денбата стоя убластров и и 1996 и 1 	
			999 <u>-00-00-00-00-00-00-00-00-00-00-00-00-00</u>

I am submitting this financial statement with the understanding that it may affect action by the Federal Trade Commission or a federal court. I have used my best efforts to obtain the information requested in this statement. The responses I have provided to the items above are true and contain all the requested facts and information of which I have notice or knowledge. I have provided all requested documents in my custody, possession, or control. I know of the penalties for false statements under 18 U.S.C. § 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five years imprisonment and/or fines). I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

(Date)

Signature

Federal Trade Commission Financial Statement of Individual Defendant

Attachment B

• •

FEDERAL TRADE COMMISSION

FINANCIAL STATEMENT OF CORPORATE DEFENDANT

Instructions:

- 1. Complete all items. Enter "None" or "N/A" ("Not Applicable") where appropriate. If you cannot fully answer a question, explain why.
- 2. The font size within each field will adjust automatically as you type to accommodate longer responses.
- 3. In completing this financial statement, "the corporation" refers not only to this corporation but also to each of its predecessors that are not named defendants in this action.
- 4. When an Item asks for information about assets or liabilities "held by the corporation," include <u>ALL</u> such assets and liabilities, located within the United States or elsewhere, held by the corporation or held by others for the benefit of the corporation.
- 5. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number being continued.
- 6. Type or print legibly.
- 7. An officer of the corporation must sign and date the completed financial statement on the last page and initial each page in the space provided in the lower right corner.

Penalty for False Information:

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

(1) "in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing the same to contain any false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);

(2) "in any ... statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or

(3) "in any (... statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information ... knowing the same to contain any false material declaration." (18 U.S.C. § 1623)

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

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14 B.

BACKGROUND INFORMATION

Item 1. General Info	ormation		
Corporation's Full Name		, , , , , , , ,	
Primary Business Address			From (Date)
Telephone No.	Fax No	D	
E-Mail Address	Internet Hor	me Page	· .
All other current addresses &	previous addresses for past fi	ve years, including	g post office boxes and mail drops:
Address		-	From/Until
Address			From/Until
Address			From/Until
All predecessor companies fo	r past five years:		
Name & Address		1 1	From/Until
Name & Address			From/Until
Name & Address		· · · ·	From/Until
Item 2. Legal Inform	. 1		
Federal Taxpayer ID No.	S	tate & Date of Inc	orporation
State Tax ID No.	State	Profit o	r Not For Profit
Corporation's Present Status:	Active	Inactive	Dissolved
If Dissolved: Date dissolved		By Whom	
Reasons			· · · · · · · · · · · · · · · · · · ·
Fiscal Year-End (Mo./Day)	Corporatio	on's Business Acti	vities
Item 3. Registered A	lgent		
Name of Registered Agent	·		•
Address			Telephone No

Item 4. Principal Stockholders

List all persons and entities that own at least 5% of the corporation's stock.

Name & Address	<u>% Owned</u>
•	

Item 5. Board Members

List all members of the corporation's Board of Directors.

	Name & Address				
		·			
		······	·		
· · · · · · · · · · · · · · · · · · ·				· · · · · · · · · · · · · · · · · · ·	
		<u></u>	·	. <u> </u>	
· · · · · · · · · · · · · · · · · · ·		÷			
· · · · ·		ř			

Item 6. Officers

List all of the corporation's officers, including *de facto* officers (individuals with significant management responsibility whose titles do not reflect the nature of their positions).

	Name & Address			% Owned		
		-				
			· · · · · · · · · · · · · · · · · · ·			
· ·						
		· · · · · · · · · · · · · · · · · · ·				
		, . , . ,				

Item 7. Businesses Related to the Corporation

List all corporations, partnerships, and other business entities in which this corporation has an ownership interest.

	Name & Address		Business Activities	tivities <u>% Owned</u>	
· · · · · · · · · · · · · · · · · · ·				• 	
			······································		
			corporation		
				······································	
tem 8. Businesses R	elated to Individuals	n de E constantes			
List all corporations, partners, members, or officers (i.e., the				ders, board	
· <u>Individual's Name</u>	Business Name	e & Address	Business Activities	<u>% Owner</u>	
			· · · · · · · · · · · · · · · · · · ·		
·					
State which of these business					
•					
tem 9. Related Indi	viduals				
List all related individuals wir years and current fiscal year-t stockholders, board members.	o-date. A "related individ	lual" is a spouse, siblir	ng, parent, or child of the prin		
Nai	ne and Address	<u>R</u>	elationship Business	<u>Activities</u>	
		••••••••••••••••••••••••••••••••••••••	· · · · · · · · · · · · · · · · · · ·		

Initials _____

Item 10. Outside Accountants

List all outside accountants retained by the corporation during the last three years.

Name	Firm Name	Address	<u>CPA/PA?</u>
		ен. 1. 21 - 11 б	
		· ·	
-			
		ş.	
· · · · · · · · · · · · · · · · · · ·	······································	· · · · · · · · · · · · · · · · · · ·	

Item 11. Corporation's Recordkeeping

List all individuals within the corporation with responsibility for keeping the corporation's financial books and records for the last three years.

	Name, Address,	Name, Address, & Telephone Number			Position(s) Held	
· · · · · · · · · · · · · · · · · · ·			<u> </u>		s	
				• •		
	· · · · · · · · · · · · · · · · · · ·				· · · ·	
		· · · · · · · · · · · · · · · · · · ·		·····		

Item 12. Attorneys

List all attorneys retained by the corporation during the last three years.

Name	Firm Name	Address
	· ··· _ · ····························	
		- • · · · · · · · · · · · · · · · · · ·
201-1-1-	- <u> </u>	
		-
	-	

Item 13. Pending Lawsuits Filed by the Corporation

List all pending lawsuits that have been filed by the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments or settlements in favor of the corporation in Item 25).

Opposing Party's Name & A	Address	·
Court's Name & Address		
		Nature of Lawsuit
	Status	
Court's Name & Address	·	·
Docket No	Relief Requested	Nature of Lawsuit
·	Status	·
Opposing Party's Name & A	Address	·
Docket No	Relief Requested	Nature of Lawsuit
	Status	
Opposing Party's Name & A	Address	
+ · · · · · · · · · · · · · · · · · · ·		
Docket No	Relief Requested	Nature of Lawsuit
	Status	
Opposing Party's Name & A	Address	· · · · · · · · · · · · · · · · · · ·
		· · ·
Docket No	Relief Requested	Nature of Lawsuit
-	Status	
Opposing Party's Name & A	Address	·
Court's Name & Address		
Docket No	Relief Requested	Nature of Lawsuit
	Status	

Initials _____

Item 14. Current Lawsuits Filed Against the Corporation

List all pending lawsuits that have been filed against the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments, settlements, or orders in Items 26 - 27).

Opposing Party's Name	e & Address	
Court's Name & Addre	SS	
		Nature of Lawsuit
	Status	
Opposing Party's Name	e & Address	·
		Nature of Lawsuit
	Status	·
		· .
Court's Name & Addre	SS	
•		Nature of Lawsuit
Opposing Party's Name	e & Address	
		······································
		Nature of Lawsuit
	Status	· · · ·
Opposing Party's Name	& Address	
Docket No	Relief Requested	Nature of Lawsuit
		·
	-	
		Nature of Lawsuit
	`	
• -		

Page 7 -

Initials _____

<u>Item 15.</u> B	ankruptcy Informatio	n		
List all state insolv	ency and federal bank	ruptcy proceedings involving t	he corporation.	
Commencement D	ate	Termination Date	Docket No,	·····
If State Court: Co	art & County	If Federal	Court: District	
Disposition				
				4
<u>Item 16.</u>	Safe Deposit Bo	xes		
		n the United States or elsewhere e page, describe the contents of	e, held by the corporation, or held feach box.	by others for the
Owner's Name	Name & Addres	s of Depository Institution		<u>Box No.</u>
		·		
		- ·		
		······································		·
	- <u></u>			

FINANCIAL INFORMATION

REMINDER: When an Item asks for information about assets or liabilities "held by the corporation," include <u>ALL</u> such assets and liabilities, located within the United States or elsewhere, held by the corporation or held by others for the benefit of the corporation.

Item 17. Tax Returns

List all federal and state corporate tax returns filed for the last three complete fiscal years. Attach copies of all returns.

<u>Federal/</u> State/Both	<u>Tax Year</u>	<u>Tax Due</u> Federal	<u>Tax Paid</u> <u>Federal</u>	<u>Tax Due</u> <u>State</u>	<u>Tax Paid</u> <u>State</u>	Preparer's Name
	S	\$	\$	\$	\$	
		§	\$	\$	\$	·
<u></u>		§	\$	\$	_ \$	

Page 8

Item 18. Financial Statements

List all financial statements that were prepared for the corporation's last three complete fiscal years and for the current fiscal year-to-date. *Attach copies of all statements, providing audited statements if available.*

Year	Balance Sheet	Profit & Loss Statement	Cash Flow Statement	Changes in Owner's Equity	Audited?
	unterver				
		· · · · · · · · · · · · · · · · · · ·			
				· · · · · · · · · · · · · · · · · · ·	
				· · · · · · · · · · · · · · · · · · ·	

Item 19. Financial Summary

For each of the last three complete fiscal years and for the current fiscal year-to-date for which the corporation has not provided a profit and loss statement in accordance with Item 18 above, provide the following summary financial information.

• •	Current Year-to-Date	<u>l Year Ago</u>	2 Years Ago	<u>3 Years Ago</u>
Gross Revenue	\$	\$	[~] \$	\$
Expenses	\$	\$	\$	\$
Net Profit After Taxes	\$	\$	\$	\$
Payables	\$			
<u>Receivables</u>	\$			

Item 20. Cash, Bank, and Money Market Accounts

List cash and all bank and money market accounts, including but not limited to, checking accounts, savings accounts, and certificates of deposit, held by the corporation. The term "cash" includes currency and uncashed checks.

Cash Held for the Corporation's Benefit \$

Initials

Name & Address of Financial Institution	Signator(s) on Account	Account No.	<u>Current</u> <u>Balance</u>
		\$	
· · · · · · · · · · · · · · · · · · ·		\$)
		\$	•

Cash on Hand \$

. `

Item 21. Government Obligations and Publicly Traded Securities

List all U.S. Government obligations, including but not limited to, savings bonds, treasury bills, or treasury notes, held by the corporation. Also list all publicly traded securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by the corporation.

Issuer	Type of Security/Obligation	· ····································
No. of Units Owned	Current Fair Market Value \$	Maturity Date
Issuer	Type of Security/Obligation	······
No. of Units Owned	Current Fair Market Value \$	Maturity Date
Item 22. Real Estate		
List all real estate, including lease	holds in excess of five years, held by the co	orporation.
Type of Property	Property's Location	n
	Percentages	
Current Value \$	Loan or Account No.	۰ ۰
Lender's Name and Address		
	ge \$ Monthly Payment \$	
Other Loan(s) (describe)	·	Current Balance \$
Monthly Payment \$	Rental Unit?	Monthly Rent Received \$
Type of Property	Property's Locatio	n
Name(s) on Title and Ownership l	Percentages	-
Current Value \$	Loan or Account No.	
Lender's Name and Address		
Current Balance On First Mortgag	ge \$ Monthly Payment \$	
Other Loan(s) (describe)	• •	Current Balance \$
Monthly Payment \$	Rental Unit?	Monthly Rent Received \$

.

Initials

 $(\cdot \cdot)$

Item 23. Other Assets

List all other property, by category, with an estimated value of \$2,500 or more, held by the corporation, including but not limited to, inventory, machinery, equipment, furniture, vehicles, customer lists, computer software, patents, and other intellectual property.

Property Category	Property Location	<u>Acquis</u> <u>Co</u>	
		\$	\$
·	•	\$	\$
		\$	\$
		\$	<u>\$</u>
		\$	\$
		\$	<u> </u>
·	·	\$	<u>\$</u>
		\$	\$
· .		\$	\$

Item 24. Trusts and Escrows

List all persons and other entities holding funds or other assets that are in escrow or in trust for the corporation.

Trustee or Escrow Agent's <u>Name & Address</u>	Description and Location of Assets	Present Market Value of Assets
	· · · · · · · · · · · · · · · · · · ·	\$
		\$
		\$
		\$
		\$
-	、 	\$
	·	\$

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Item 25. Monetary Judgments and Settlements Owed To the Corporation

List all monetary judgments and settlements, recorded and unrecorded, owed to the corporation.

Opposing Party's Name & Address		
Court's Name & Address	s	Docket No.
Nature of Lawsuit	Date of Judgment	Amount \$
Opposing Party's Name & Address		
Court's Name & Address		_ Docket No
Nature of Lawsuit	Date of Judgment	Amount \$

Item 26. Monetary Judgments and Settlements Owed By the Corporation

List all monetary judgments and settlements, recorded and unrecorded, owed by the corporation.

Opposing Party's Name & Address		
Court's Name & Address		Docket No
Nature of Lawsuit	Date	Amount \$
Opposing Party's Name & Address		······
Court's Name & Address		Docket No
Nature of Lawsuit	Date of Judgment	Amount \$
Opposing Party's Name & Address		
Court's Name & Address		Docket No.
Nature of Lawsuit	Date of Judgment	Amount \$
Opposing Party's Name & Address		
Court's Name & Address		Docket No
Nature of Lawsuit	Date of Judgment	Amount \$
Opposing Party's Name & Address		
Court's Name & Address		Docket No
Nature of Lawsuit	Date of Judgment	Amount \$

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Item 27. Government Orders and Settle	ments
List all existing orders and settlements between the	e corporation and any federal or state government entities.
Name of Agency	Contact Person
Address	Telephone No
Agreement Date Nature of Agr	eement
Item 28. Credit Cards	charge accounts and the individuals outherized to use them
List an of the corporation's credit cards and store	charge accounts and the individuals authorized to use them.
Name of Credit Card or Store	Names of Authorized Users and Positions Held

Item 29. **Compensation of Employees**

List all compensation and other benefits received from the corporation by the five most highly compensated employees, independent contractors, and consultants (other than those individuals listed in Items 5 and 6 above), for the two previous fiscal years and current fiscal year-to-date. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, bonuses, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

Name/Position	Current Fiscal Year-to-Date	<u>1 Year Ago</u>	2 Years Ago	Compensation or Type of Benefits
·	_\$	\$	\$	
	_\$	\$	<u>\$</u>	· · · · · · · · · · · · · · · · · · ·
	_ \$	_ \$	\$	· · · · · · · · · · · · · · · · · · ·
	\$	<u>\$</u>	\$	
	_\$	\$		

Item 30. Compensation of Board Members and Officers

List all compensation and other benefits received from the corporation by each person listed in Items 5 and 6, for the current fiscal year-to-date and the two previous fiscal years. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

Name/Position	<u>Current Fiscal</u> Year-to-Date	<u>1 Year Ago</u>	2 Years Ago	Compensation or Type of Benefits
	_ \$	\$	\$	<u>.</u>
	_\$	_\$	<u>\$</u>	
	\$	_ \$	\$	
	\$	\$	\$	
	_\$	\$	_ \$	· · · · · · · · · · · · · · · · · · ·
	_ \$	\$	_\$	
	\$	\$	\$	
· -	_\$	\$ <u>`</u>	\$. ·

Item 31. Transfers of Assets Including Cash and Property

List all transfers of assets over \$2,500 made by the corporation, other than in the ordinary course of business, during the previous three years, by loan, gift, sale, or other transfer.

Transferee's Name, Address, & Relationship	Property Transferred	<u>Aggregate</u> <u>Value</u>	<u>Transfer</u> <u>Date</u>	<u>Type of Transfer</u> (e.g., Loan, Gift)
		\$		
		\$		
		\$		
·		\$		
·		\$		·
			,	

Item 32. Documents Attached to the Financial Statement

List all documents that are being submitted with the financial statement.

I am submitting this financial statement with the understanding that it may affect action by the Federal Trade Commission or a federal court. I have used my best efforts to obtain the information requested in this statement. The responses I have provided to the items above are true and contain all the requested facts and information of which I have notice or knowledge. I have provided all requested documents in my custody, possession, or control. I know of the penalties for false statements under 18 U.S.C. § 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five years imprisonment and/or fines). I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

(Date) ·

Signature

Corporate Position