

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HYPERBEARD, INC., a corporation, and

ALEXANDER KOZACHENKO and
ANTONIO URIBE,
individually and as officers of
HyperBeard, Inc.,

Defendants.

Case No. 3:20-cv-3683

**[PROPOSED] STIPULATED ORDER
FOR PERMANENT INJUNCTION AND
CIVIL PENALTY JUDGMENT**

Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“Commission”), filed its Complaint for Civil Penalties, Permanent Injunction, and Other Equitable Relief (“Complaint”), in this matter, pursuant to Sections 5(a)(1), 5(m)(1)(A), 13(b), 16(a)(1), and 19, of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a)(1), 45(m)(1)(A), 53(b), 56(a)(1), and 57(b), and Sections 1303(c) and 1306(d) of the Children’s Online Privacy Protection Act (“COPPA”),

1 15 U.S.C. §§ 6502(c) and 6505(d), and the Commission’s Children’s Online Privacy Protection
2 Rule (“COPPA Rule”), 16 C.F.R. Part 312. Defendants have waived service of the summons
3 and the Complaint. The parties have been represented by the attorneys whose names appear
4 hereafter. Plaintiff and Defendants stipulate to the entry of this Stipulated Order for Permanent
5 Injunction and Civil Penalty Judgment (“Order”) to resolve all matters in dispute in this action
6 between them.

7 THEREFORE, IT IS ORDERED as follows:

8 **FINDINGS**

- 9 1. This Court has jurisdiction over this matter.
- 10 2. The Complaint charges that Defendants violated COPPA and the FTC Act by
11 failing to provide notice to parents of their information practices and failing to obtain verifiable
12 parental consent prior to allowing a third party to collect, use, or disclose personal information of
13 children on Defendants’ behalf.
- 14 3. Defendants neither admit nor deny any of the allegations in the Complaint, except
15 as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts
16 necessary to establish jurisdiction.
- 17 4. Defendants waive any claim that they may have under the Equal Access to Justice
18 Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order,
19 and agree to bear their own costs and attorney fees.
- 20 5. Defendants and Plaintiff waive all rights to appeal or otherwise challenge or
21 contest the validity of this Order.
22

DEFINITIONS

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

- A. **“Child”** means an individual under the age of 13.
- B. **“Collects”** or **“Collection”** means the gathering of any Personal Information from a Child by any means, including but not limited to:
 - 1. Requesting, prompting, or encouraging a Child to submit Personal Information online;
 - 2. Enabling a Child to make Personal Information publicly available in identifiable form; or
 - 3. Passive tracking of a Child online.
- C. **“Corporate Defendant”** means HyperBeard, Inc. (“HyperBeard”), a corporation, and its successors and assigns.
- D. **“Individual Defendants”** means Alexander Kozachenko and Antonio Uribe.
- E. **“Defendants”** means the Individual Defendants and the Corporate Defendant, individually, collectively, or in any combination.
- F. **“Disclose”** or **“Disclosure”** means, with respect to Personal Information:
 - 1. The Release of Personal Information Collected by an Operator from a Child in identifiable form for any purpose, except where an Operator provides such information to a person who provides Support for the Internal Operations of the Website or Online Service; and
 - 2. Making Personal Information Collected by an Operator from a Child publicly available in identifiable form by any means, including but not limited to a public posting through the Internet, or through a personal home page or screen posted on

1 a website or online service; a pen pal service; an electronic mail service; a
2 message board; or a chat room.

3 G. **“Internet”** means collectively the myriad of computer and telecommunications facilities,
4 including equipment and operating software, which comprise the interconnected world-
5 wide network of networks that employ the Transmission Control Protocol/Internet
6 Protocol, or any predecessor or successor protocols to such protocol, to communicate
7 information of all kinds by wire, radio, or other methods of transmission.

8 H. **“Obtaining Verifiable Parental Consent”** means making any reasonable effort (taking
9 into consideration available technology) to ensure that before Personal Information is
10 Collected from a Child, a Parent of the Child:

- 11 1. Receives notice of the Operator’s Personal Information Collection, use, and
12 disclosure practices; and
- 13 2. Authorizes any Collection, use, and/or disclosure of the Personal Information.

14 I. **“Online Contact Information”** means an e-mail address or any other substantially
15 similar identifier that permits direct contact with a person online, including but not
16 limited to, an instant messaging user identifier, a voice over internet protocol (VOIP)
17 identifier, or a video chat user identifier.

18 J. **“Operator”** means any person who operates a website located on the Internet or an
19 online service and who Collects or maintains Personal Information from or about the
20 users of or visitors to such website or online service, or on whose behalf such information
21 is Collected or maintained, or offers products or services for sale through that website or
22 online service, where such website or online service is operated for commercial purposes
involving commerce among the several States or with 1 or more foreign nations; in any

1 territory of the United States or in the District of Columbia, or between any such territory
2 and another such territory or any State or foreign nation; or between the District of
3 Columbia and any State, territory, or foreign nation. Personal Information is Collected or
4 maintained on behalf of an Operator when:

- 5 1. It is Collected or maintained by an agent or service provider of the Operator; or
- 6 2. The Operator benefits by allowing another person to Collect Personal Information
7 directly from users of such website or online service.

8 K. **“Parent”** includes a legal guardian.

9 L. **“Person”** means any individual, partnership, corporation, trust, estate, cooperative,
10 association, or other entity.

11 M. **“Personal Information”** means individually identifiable information about an individual
12 Collected online, including:

- 13 1. A first and last name;
- 14 2. A home or other physical address including street name and name of a city or
15 town;
- 16 3. Online Contact Information;
- 17 4. A screen or user name where it functions in the same manner as Online Contact
18 Information;
- 19 5. A telephone number;
- 20 6. A Social Security number;
- 21 7. A persistent identifier that can be used to recognize a user over time and across
22 different websites or online services. Such persistent identifier includes, but is not

- 1 limited to, a customer number held in a cookie, an Internet Protocol (IP) address,
2 a processor or device serial number, or unique device identifier;
- 3 8. A photograph, video, or audio file where such file contains a Child's image or
4 voice;
- 5 9. Geolocation information sufficient to identify street name and name of a city or
6 town; or
- 7 10. Information concerning the Child or the Parents of that Child that the Operator
8 Collects online from the Child and combines with an identifier described in this
9 definition.

10 N. **"Release of Personal Information"** means the sharing, selling, renting, or transfer of
11 Personal Information to any Third Party.

12 O. **"Support for the Internal Operations of the Website or Online Service"** means

- 13 1. Those activities necessary to:
- 14 a. Maintain or analyze the functioning of the website or online service;
- 15 b. Perform network communications;
- 16 c. Authenticate users of, or personalize the content on, the website or online service;
- 17 d. Serve contextual advertising on the website or online service or cap the frequency
18 of advertising;
- 19 e. Protect the security or integrity of the user, website, or online service;
- 20 f. Ensure legal or regulatory compliance; or
- 21 g. Fulfill a request of a Child as permitted by § 312.5(c)(3) and (4) of COPPA;
- 22

1 material change in the Collection, use, or Disclosure practices to which the Parent has previously
2 consented;

3 B. Failing to post a prominent and clearly labeled link to an online notice of its information
4 practices with regard to Children on the home or landing page or screen of its website or online
5 service, *and* at each area of the website or online service where Personal Information is Collected
6 from Children; and

7 C. Failing to Obtain Verifiable Parental Consent before any Collection, use, or Disclosure of
8 Personal Information from Children, including consent to any material change in the Collection,
9 use, or Disclosure practices to which the Parent has previously consented; and

10 D. Violating the Children’s Online Privacy Protection Rule, 16 C.F.R. Part 312 (attached as
11 Appendix A).

12 **II. INJUNCTION CONCERNING DELETION OF CHILDREN’S PERSONAL
13 INFORMATION**

14 IT IS FURTHER ORDERED that Defendants, Defendants’ officers, agents, employees,
15 and all other Persons in active concert or participation with any of them, who receive actual
16 notice of this Order, are ordered to:

17 A. Refrain from Disclosing, using, or benefitting from Personal Information Collected from
18 Children that Defendants obtained prior to entry of this Order; and

19 B. Destroy such Personal Information in all forms in their possession, custody, or control within
20 ten (10) days after entry of this Order.

21

22

1 **III. MONETARY JUDGMENT FOR CIVIL PENALTY**

2 IT IS FURTHER ORDERED that:

3 A. Judgment in the amount of four million dollars (\$4,000,000) is entered in favor of
4 Plaintiff against Corporate Defendant and Individual Defendant Kozachenko, jointly and
5 severally, as a civil penalty.

6 B. Corporate Defendant is ordered to pay to Plaintiff, by making payment to the Treasurer
7 of the United States, one hundred and fifty thousand dollars (\$150,000), which, as Corporate
8 Defendant stipulates, its undersigned counsel holds in escrow for no purpose other than payment
9 to Plaintiff. Such payment must be made within seven (7) days of entry of this Order by
10 electronic fund transfer in accordance with instructions previously provided by a representative
11 of Plaintiff. Upon such payment, the remainder of the judgment is suspended, subject to the
12 Subsections below.

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

17 1. the Financial Statement of Individual Defendant Alexander Kozachenko signed on
18 November 16, 2019, including the attachments; and

19 2. the Financial Statement of Corporate Defendant HyperBeard, Inc. signed by Chief
20 Executive Officer Alexander Kozachenko, on November 16, 2019, including the attachments.

21 D. The suspension of the judgment will be lifted as to Corporate Defendant and Defendant
22 Kozachenko if, upon motion by the Plaintiff, the Court finds that Corporate Defendant or
Defendant Kozachenko failed to disclose any material asset, materially misstated the value of

1 any asset, or made any other material misstatement or omission in the financial representations
2 identified above.

3 E. If the suspension of the judgment is lifted, the judgment becomes immediately due as to
4 Corporate Defendant and Defendant Kozachenko in the amount specified in Subsection A above
5 (which the parties stipulate only for purposes of this Section represents the amount of civil
6 penalty for the violations alleged in the Complaint), less any payment previously made pursuant
7 to this Section, plus interest computed from the date of entry of this Order.

8 **IV. ADDITIONAL MONETARY PROVISIONS**

9 IT IS FURTHER ORDERED that:

10 A. Defendants relinquish dominion and all legal and equitable right, title, and interest in all
11 assets transferred pursuant to this Order and may not seek the return of any assets.

12 B. The facts alleged in the Complaint will be taken as true, without further proof, in any
13 subsequent civil litigation by or on behalf of the Commission, including in a proceeding to
14 enforce its rights to any payment or monetary judgment pursuant to this Order.

15 C. Defendants acknowledge that their Taxpayer Identification Numbers, which Defendants
16 must submit to the Commission, may be used for collecting and reporting on any delinquent
17 amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

18 **V. ORDER ACKNOWLEDGMENTS**

19 IT IS FURTHER ORDERED that Defendants obtain acknowledgments of receipt of this
20 Order:

21 A. Each Defendant, within 7 days of entry of this Order, must submit to the Commission an
22 acknowledgment of receipt of this Order sworn under penalty of perjury.

1 B. For five (5) years after entry of this Order, the Individual Defendant for any business that
2 such Defendant, individually or collectively with any other Defendants, is the majority owner or
3 controls directly or indirectly, and the Corporate Defendant, must deliver a copy of this Order to:
4 (1) all principals, officers, directors, managers and members; (2) all employees having
5 managerial responsibilities relating to the Collection, retention, storage, or security of Personal
6 Information, and all agents and representatives who participate in the operation of any of
7 Defendants' websites or online services; and (3) any business entity resulting from any change in
8 structure as set forth in the Section titled Compliance Reporting. Delivery must occur within
9 seven (7) days of entry of this Order for current personnel. To all others, delivery must occur
10 before they assume their responsibilities.

11 C. From each individual or entity to which Defendants delivered a copy of this Order,
12 Defendants must obtain, within 30 days, a signed and dated acknowledgment of receipt of this
13 Order.

14 VI. COMPLIANCE REPORTING

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

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

19 1. Each Defendant must: (a) identify the primary physical, postal, and email address
20 and telephone number, as designated points of contact, which representatives of the Commission
21 and Plaintiff may use to communicate with Defendants; (b) identify all of that Defendant's
22 businesses by all of their names, telephone numbers, and physical, postal, email, and Internet
addresses; (c) describe the activities of each business, including the goods and services offered,

1 the means of advertising, marketing, and sales, and the involvement of any other Defendant
2 (which Individual Defendant must describe if he knows or should know due to his own
3 involvement); (d) describe in detail whether and how that Defendant is in compliance with each
4 Section of this Order; (e) provide a copy of each different version of any privacy notice posted
5 on each website or online service operated by Defendants or sent to Parents of Children that
6 register on each website or online service; (f) provide a statement setting forth in detail the
7 methods used to Obtain Verifiable Parental Consent prior to any Collection, use, and/or
8 Disclosure of Personal Information from Children; (g) provide a statement setting forth in detail
9 the means provided for Parents to review the Personal Information Collected from their Children
10 and to refuse to permit its further use or maintenance; and (h) provide a copy of each Order
11 Acknowledgment obtained pursuant to this Order, unless previously submitted to the
12 Commission.

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

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

20 1. Each Defendant must report any change in: (a) any designated point of contact;
21 or (b) the structure of Corporate Defendant or any entity that Defendants have any ownership
22 interest in or control directly or indirectly that may affect compliance obligations arising under

1 this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary,
2 Parent, or affiliate that engages in any acts or practices subject to this Order.

3 2. Additionally, Individual Defendant must report any change in: (a) name,
4 including aliases or fictitious name, or residence address; or (b) title or role in any business
5 activity, including any business for which such Defendant performs services whether as an
6 employee or otherwise and any entity in which such Defendant has any ownership interest, and
7 identify the name, physical address, and any Internet address of the business or entity.

8 C. Each Defendant must submit to the Commission notice of the filing of any bankruptcy
9 petition, insolvency proceeding, or similar proceeding by or against each Defendant within 14
10 days of its filing.

11 D. Any submission to the Commission required by this Order to be sworn under penalty of
12 perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I
13 declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct. Executed on: _____” and supplying the date, signatory’s full
15 name, title (if applicable), and signature.

16 E. Unless otherwise directed by a Commission representative in writing, all submissions to
17 the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight
18 courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of
19 Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington,
20 DC 20580. The subject line must begin: United States v. HyperBeard, Inc.

21 **VII. RECORDKEEPING**

22 IT IS FURTHER ORDERED that Defendants must create certain records for ten (10)
years after entry of the Order, and retain each such record for five (5) years. Specifically,

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

4 A. Accounting records showing the revenues from all goods or services sold;

5 B. All records necessary to demonstrate full compliance with each provision of this Order,
6 including all submissions to the Commission;

7 C. Copies of all consumer complaints relating to Defendants' Collection of Personal
8 Information whether received directly or indirectly, such as through a Third Party, and any
9 response; and

10 D. A copy of each materially different form, page, or screen created, maintained, or
11 otherwise provided by Defendants through which Defendants Collect Personal Information other
12 than solely a Persistent Identifier, and a copy of each materially different document containing
13 any representation regarding Defendants' Collection, use, and Disclosure practices pertaining to
14 Personal Information.

14 **VIII. COMPLIANCE MONITORING**

15 IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance
16 with this Order:

17 A. Within 14 days of receipt of a written request from a representative of the Commission or
18 Plaintiff, each Defendant must: submit additional compliance reports or other requested
19 information, which must be sworn under penalty of perjury; appear for depositions; and produce
20 documents for inspection and copying. The Commission and Plaintiff are also authorized to
21 obtain discovery, without further leave of court, using any of the procedures prescribed by
22

1 Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45,
2 and 69.

3 B. For matters concerning this Order, the Commission and Plaintiff are authorized to
4 communicate directly with each Defendant. Defendants must permit representatives of the
5 Commission and Plaintiff to interview any employee or other Person affiliated with any
6 Defendant who has agreed to such an interview. The Person interviewed may have counsel
7 present.

8 C. The Commission and Plaintiff may use all other lawful means, including posing, through
9 its representatives, as consumers, suppliers, or other individuals or entities, to Defendants or any
10 individual or entity affiliated with Defendants, without the necessity of identification or prior
11 notice. Nothing in this Order limits the Commission's lawful use of compulsory process,
12 pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

13 **IX. RETENTION OF JURISDICTION**

14 IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for
15 purposes of construction, modification, and enforcement of this Order.

16 **SO ORDERED** this ____ day of _____, 2020.

17 _____
18 UNITED STATES DISTRICT JUDGE

19

20

21

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

SO STIPULATED AND AGREED:

FOR PLAINTIFF UNITED STATES OF AMERICA:

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

ETHAN P. DAVIS
Deputy Assistant Attorney General
Civil Division

GUSTAV W. EYLER
Director
Consumer Protection Branch

ANDREW E. CLARK
Assistant Director
Consumer Protection Branch

Danielle Serbin Digitally signed by Danielle Serbin
Date: 2020.06.03 16:41:25 -04'00'

DANIELLE SERBIN
Trial Attorney
Consumer Protection Branch
U.S. Department of Justice
P.O. Box 386
Washington, DC 20044
Tel: (202) 514-8742
Fax: (202) 514-8742
Email: danielle.e.serbin@usdoj.gov
California SBN 294369

1 **FOR THE FEDERAL TRADE COMMISSION:**

2 **MANEESHA** Digitally signed by
MITHAL MANEESHA MITHAL
Date: 2020.06.01
16:51:31 -04'00'

3 **MANEESHA MITHAL**
4 Associate Director
5 Division of Privacy and Identity Protection

6 **LAWRENCE** Digitally signed by
EICHORN LAWRENCE EICHORN
Date: 2020.06.01
16:00:53 -04'00'

7 **MARK EICHORN**
8 Assistant Director
9 Division of Privacy and Identity Protection

10 **GORANA** Digitally signed by
NESKOVIC GORANA NESKOVIC
Date: 2020.06.01
15:45:39 -04'00'

11 **GORANA NESKOVIC**
12 Attorney
13 Division of Privacy and Identity Protection
14 Federal Trade Commission
15 600 Pennsylvania Avenue NW
16 Mail Stop CC-8232
17 Washington, DC 20580
18 (202) 326-2322
19 GNeskovic@ftc.gov

20 **PEDER** Digitally signed by
MAGEE PEDER MAGEE
Date: 2020.06.01
16:27:00 -04'00'

21 **PEDER MAGEE**
22 Attorney
Division of Privacy and Identity Protection
Federal Trade Commission
600 Pennsylvania Avenue NW
Mail Stop CC-8232
Washington, DC 20580
(202) 326-3538
PMagee@ftc.gov

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

FOR DEFENDANTS:



Date: 7 JAN 2020

JENNIFER C. ARCHIE
ALEXANDER L. STOUT
Latham & Watkins LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Tel: (202) 637-2205
Jennifer.Archie@lw.com
Alexander.Stout@lw.com
Counsel for HyperBeard, Inc.

ANTHONY E. DIRESTA
Holland & Knight LLP
800 17th Street, NW, Suite 1100
Washington, DC 20006
Tel: (202) 469-5164
Anthony.DiResta@hklaw.com
Counsel for Defendant Alexander Kozachenko

Date: _____

KEITH L. COOPER
Morrison Rothman LLP
1801 Century Park East, 25th Floor
Los Angeles, CA 90067
Tel: (310) 556-9611
Keith@morrisonrothman.com
Counsel for Defendant Antonio Uribe

Date: _____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

FOR DEFENDANTS:

Date: _____

JENNIFER C. ARCHIE
ALEXANDER L. STOUT
Latham & Watkins, LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Tel: (202) 637-2205
Jennifer.Archie@lw.com
Alexander.Stout@lw.com
Counsel for HyperBeard, Inc.



Date: 1/8/2020

ANTHONY E. DIRESTA
Holland & Knight LLP
800 17th Street, NW, Suite 1100
Washington, DC 20006
Tel: (202) 469-5164
Anthony.DiResta@hkllaw.com
Counsel for Defendant Alexander Kozachenko

Date: _____

KEITH L. COOPER
Morrison Rothman LLP
1801 Century Park East, 25th Floor
Los Angeles, CA 90067
Tel: (310) 556-9611
Keith@morrisonrothman.com
Counsel for Defendant Antonio Uribe

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

FOR DEFENDANTS:

Date: _____

JENNIFER C. ARCHIE
ALEXANDER STOUT
Latham & Watkins, LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Tel: (202) 637-2205
Jennifer.Archie@lw.com
Alexander.Stout@lw.com
Counsel for HyperBeard, Inc.

Date: _____

ANTHONY E. DIRESTA
Holland & Knight LLP
800 17th Street, NW, Suite 1100
Washington, DC 20006
Tel: (202) 469-5164
Anthony.DiResta@hkllaw.com
Counsel for Defendant Alexander Kozachenko

Date: 1/8/20



KEITH L. COOPER
Morrison Rothman LLP
1801 Century Park East, 25th Floor
Los Angeles, CA 90067
Tel: (310) 556-9611
Keith@morrisonrothman.com
Counsel for Defendant Antonio Uribe

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

DEFENDANTS:



Date: January 7, 2020

Alexander Kozachenko
*Individually and as an officer of
HyperBeard, Inc.*

Antonio Uribe
*Individually and as an officer of
HyperBeard, Inc.*

Date: _____



Date: January 7, 2020

HyperBeard, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

DEFENDANTS:

Alexander Kozachenko
*Individually and as an officer of
HyperBeard, Inc.* Date: _____

Antonio Uribe

Antonio Uribe
*Individually and as an officer of
HyperBeard, Inc.* Date: 08/January/2020

HyperBeard, Inc. Date: _____