

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

FEDERAL TRADE COMMISSION,  
Petitioner,

v.

FULLY ACCOUNTABLE, LLC,  
Respondent.

Misc. No. 5.18 MC

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Judge Sara Lioi

ORDER

Upon consideration of Petitioner Federal Trade Commission's *Ex Parte* Motion for Temporary Seal, and having reviewed the submissions of counsel and the record, the Court finds that good cause exists to temporarily seal the Federal Trade Commission's Petition to Enforce Civil Investigative Demand, supporting exhibits, and Memorandum of Points and Authorities in Support. Specifically, the Court finds as follows:

1. These documents contain and refer to information submitted to the Commission by Respondent Fully Accountable, LLC in response to a civil investigative demand, a form of administrative compulsory process;
2. The Federal Trade Commission Act and the Commission's Rules of

Practice restrict from disclosure such information and the Commission may only disclose such information in court or adjudicative proceedings consistent with the Commission's Rules. *See* 15 U.S.C. §§ 57b-2(b)(3)(C), (d)(2); 16 C.F.R. §§ 4.10(a)(8), (a)(9), (d);

3. The Commission's Rules allow such disclosure if "the submitter [is] afforded an opportunity to seek an appropriate protective or *in camera* order. 16 C.F.R. § 4.10(g);

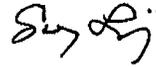
4. The Commission's Motion for Temporary Seal is consistent with all of these authorities, protecting from disclosure the information produced in response to compulsory process while giving Fully Accountable the opportunity to seek its own protections; and

5. The Commission's request for a temporary seal is narrowly tailored to limit public access to this information for the minimal period required for Fully Accountable to determine whether to seek its own protections.

**IT IS HEREBY ORDERED** that (1) Federal Trade Commission's Petition to Enforce Civil Investigative Demand; (2) Petition Exhibits 1 through 8 and all attachments; and (3) the Federal Trade Commission's Memorandum of Points and Authorities in Support of Petition to Enforce Civil Investigative Demand are sealed and shall remain under seal until the later of the following periods: (1) ten (10) days after Petitioner Federal Trade Commission notifies this Court that it has served Respondent Fully Accountable, LLC with the Order to Show Cause and its Motion for Temporary Seal, or (2) Respondent Fully Accountable files a motion for protective order or seal and this Court rules upon such motion; and

**IT IS FURTHER ORDERED** that if Respondent Fully Accountable, LLC files no motion for protective order or seal within ten days of notice of these proceedings by the Petitioner Federal Trade Commission, then the seal shall be lifted and the documents described above be placed on the public record.

SO ORDERED, this 12th day of June, 2018.



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UNITED STATES DISTRICT JUDGE