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BLOCK, ALAN SCHILL and
ZANELO, LLC

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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 FEDERAL TRADE COMMISSION,
17
18 Plaintiff,
19 v.
20 AH MEDIA GROUP, LLC, HENRY
BLOCK, ALAN SCHILL, and ZANELO,
21 LLC
22 Defendants.
23

Case No.: 19-cv-04022-JD

Hon. James Donato

[Proposed] STIPULATED ORDER FOR
PERMANENT INJUNCTION AND
MONETARY JUDGMENT AGAINST
AH MEDIA GROUP, LLC AND
HENRY BLOCK

24
25 Plaintiff, Federal Trade Commission (“Commission”), filed its Amended
26 Complaint for Permanent Injunction and Other Equitable Relief in this matter, pursuant

1 to Sections 13(b) and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C.
2 §§ 53(b) and 57b, Section 5 of the Restore Online Shoppers’ Confidence Act
3 (“ROSCA”), 15 U.S.C. § 8404, and Section 918(c) of the Electronic Fund Transfer Act
4 (“EFTA”), 15 U.S.C. § 1693o(c). The Commission and Defendants AH Media Group,
5 LLC, and Henry Block (collectively, “Stipulating Defendants”), stipulate to the entry of
6 this Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”) to
7 resolve all matters in dispute in this action between them.

8 **THEREFORE, IT IS ORDERED** as follows:

9 **FINDINGS**

10 A. This Court has jurisdiction over this matter.

11 B. The Amended Complaint charges that Defendants participated in deceptive
12 and unfair acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a),
13 Section 4 of the Restore Online Shoppers’ Confidence Act (“ROSCA”), 15 U.S.C.
14 § 8403, and Section 907(a) of the Electronic Fund Transfer Act (“EFTA”), 15 U.S.C.
15 § 1693e(a), and Section 1005.10(b) of Regulation E, 12 C.F.R. § 1005.10(b), in the
16 marketing and sale online of skin care products and weight loss supplements.

17 C. Stipulating Defendants neither admit nor deny any of the allegations in the
18 Amended Complaint, except as specifically stated in this Order. Only for purposes of
19 this action, the Stipulating Defendants admit the facts necessary to establish jurisdiction.

20 D. Stipulating Defendants waive any claim they may have under the Equal
21 Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action
22 through the date of this Order, and agree to bear their own costs and attorney fees.

23 E. Stipulating Defendants waive all rights to appeal or otherwise challenge or
24 contest the validity of this Order.

25 **DEFINITIONS**

26 For purposes of this Order, the following definitions apply:

1 disclosure appears;

2 6. The disclosure must comply with these requirements in each medium
3 through which it is received, including all electronic devices and face-to-face
4 communications;

5 7. The disclosure must not be contradicted or mitigated by, or
6 inconsistent with, anything else in the communication; and

7 8. When the representation or sales practice targets a specific audience,
8 such as children, the elderly, or the terminally ill, “ordinary consumers” includes
9 reasonable members of that group.

10 D. **“Corporate Defendant”** means AH Media Group, LLC by whatever other
11 names it may be known, and its subsidiaries, affiliates, successors, and assigns, and any
12 fictitious business entities or business names created or used by these entities.

13 E. **“Individual Defendant”** means Henry Block and his officers, agents,
14 employees, and attorneys.

15 F. **“Negative Option Feature”** means, in an offer or agreement to sell or
16 provide any good or service, a provision under which the consumer’s silence or failure to
17 take affirmative action to reject a good or service or to cancel the agreement is interpreted
18 by the seller or provider as acceptance or continuing acceptance of the offer.

19 G. **“Preauthorized Electronic Fund Transfer,”** as defined by the Electronic
20 Fund Transfer Act, 15 U.S.C. § 1693a(10), means an electronic fund transfer authorized
21 in advance to recur at substantially regular intervals.

22 H. **“Preliminary Injunction”** means the Stipulated Preliminary Injunction as
23 to Defendants entered on August 28, 2019 (Dkt. #52).

24 I. **“Receiver”** means Robb Evans & Associates LLC, appointed as Receiver
25 pursuant to Section XIV of the Preliminary Injunction.

1 J. **“Receivership Entities”** means the Corporate Defendant and its
2 subsidiaries, affiliates, successors, and assigns, including but not limited to, KA Ketterlin,
3 LLC; AE Hart, LLC; Understated Investments, LLC; JBE Investments, LLC; ANS
4 Investments, LLC; SAM Investments, LLC; ESM Investments, LLC; MOOD
5 Investments, LLC; EEG Investments, LLC; AMES Investments, LLC; LAB Investments,
6 LLC; ELANN Investments, LLC; KDUR Investments, LLC; BEAN Investments, LLC;
7 PIAZ Investments, LLC; AMB Investments, LLC; KMD Investments, LLC; CCB I
8 Investment, LLC; LE Limited, LLC; GALB Investments, LLC; PYPER Investments,
9 LLC; PEEPS Investments, LLC; SES Investments, LLC; Maddy Investments, LLC;
10 CHAZ Investments, LLC; LWA Investments, LLC; SCW Investments, LLC; KJA
11 Investments, LLC; MCH Investments, LLC; TWP Investments, LLC; Colette Limited,
12 LLC; MPM Health, LLC; GRL Health, LLC; SW Health, LLC; KGW Health, LLC; HSK
13 Health, LLC; AAM Health, LLC; BJM Health, LLC; KJL Health, LLC; AAH Health,
14 LLC; RWM Health, LLC; LJL Health, LLC; SMW Health, LLC; BAS Health, LLC;
15 NMG Health, LLC; GWV Health, LLC; SWC Health, LLC; TCO Health, LLC; MBR
16 Health, LLC; MAG Health, LLC; EMB Health, LLC; JMD Health, LLC; CBC Health,
17 LLC; CLM Health, LLC; LAZ Health, LLC; JMO Health, LLC; ZB Health, LLC; BS
18 Health, LLC; IJG Health, LLC; BSB Health, LLC; RAZ Health, LLC; TCM Health,
19 LLC; KJW Health, LLC; and CAG Health, LLC.

20 K. **“Stipulating Defendants”** means the Individual Defendant and the
21 Corporate Defendant, individually, collectively, or in any combination.

22 **ORDER**

23 **I. BAN RELATING TO NEGATIVE OPTION FEATURES**

24 **IT IS THEREFORE ORDERED** that Stipulating Defendants, whether acting
25 directly or through an intermediary, are permanently restrained and enjoined from
26 promoting or offering for sale any good or service with a Negative Option Feature.

1 restrained and enjoined from:

2 A. Failing to timely obtain written authorization signed or similarly
3 authenticated by the consumer for any Preauthorized Electronic Fund Transfer from a
4 consumer's account before initiating any Preauthorized Electronic Fund Transfer; or

5 B. Failing to timely provide the consumer a copy of a valid written
6 authorization signed or similarly authenticated by the consumer for any Preauthorized
7 Electronic Fund Transfer.

8 **V. MONETARY JUDGMENT AND PARTIAL SUSPENSION**

9 **IT IS FURTHER ORDERED** that:

10 A. Judgment in the amount of SIXTY-SEVEN MILLION DOLLARS
11 (\$67,000,000) is entered in favor of the Commission against Stipulating Defendants,
12 jointly and severally, as equitable monetary relief. The liability of Stipulating Defendants
13 for the judgment shall be joint and several with any and all other Defendants named in
14 the Complaint against whom the Court may enter judgment, jointly and severally, for
15 equitable monetary relief.

16 B. In partial satisfaction of this judgment:

17 1. Stipulating Defendant Henry Block shall pay to Plaintiff ONE MILLION
18 FORTY-FIVE THOUSAND DOLLARS (\$1,045,000). By his signature
19 below, Stipulating Defendant Henry Block confirms that \$700,000 is
20 currently held by his undersigned counsel in a client trust account for no
21 purpose other than payment to the Commission. In complying with this
22 subsection, Stipulating Defendant Henry Block is ordered, within 10 days
23 of entry of this Order, to transfer to the Commission the \$700,000 in the
24 client trust account, and to pay an additional \$345,000 (for a total of
25 \$1,045,000), to the Commission in accordance with instructions that have
26 been provided by a representative of the Commission.

1 2. To the extent not already done under the Temporary Restraining Order or
2 Preliminary Injunction, all financial institutions holding accounts in the
3 name of, or for the benefit of Stipulating Defendants shall, within 10
4 business days from receipt of a copy of this order, transfer as directed
5 below all funds (except as specified in Subsection iv below), if any, in
6 such accounts, including, but not limited to:

7 i. First National Bank shall, within 10 business days from receipt of a
8 copy of this Order, transfer to the Receiver all funds, if any, in
9 account number ending x3654 in the name of Henry Block.

10 ii. Ally Bank shall, within 10 business days from receipt of a copy of
11 this Order, transfer to the Receiver all funds, if any, in account
12 number x3216, in the name of Henry Block.

13 iii. Wells Fargo Bank shall, within 10 business days from receipt of a
14 copy of this Order, transfer to the Receiver all funds, if any, in
15 account number x6703, in the name of H. Block Investments.

16 iv. Wells Fargo Bank shall, within 10 business days from receipt of a
17 copy of this Order, transfer to the Receiver the amount of
18 \$1,412.75 from account number x7055, in the name of South
19 Broadway Auto Group, Inc.

20 v. First National Bank shall, within 10 business days from receipt of a
21 copy of this Order, transfer to the Receiver all funds, if any, in
22 account number x3372, in the name of Block Asset Management.

23 C. Upon the payments and asset transfers identified in this Section V, the
24 remainder of this judgment as to Stipulating Defendants is suspended, subject to the
25 Subsections below.

1 D. The Commission’s agreement to the suspension of part of the judgment is
2 expressly premised upon the truthfulness, accuracy, and completeness of Stipulating
3 Defendants’ sworn financial statements and related documents (collectively, “financial
4 representations”) submitted to the Commission, namely:

- 5 1. Henry Block’s July 31, 2019 sworn Financial Statement of Individual
6 Defendant, including attachments, as revised on September 12, 2019;
- 7 2. Henry Block’s July 28, 2019 Cryptocurrency Financial Statement;
- 8 3. AH Media Group LLC’s July 31, 2019 sworn Corporate Financial
9 Disclosure Form, including attachments;
- 10 4. Affidavit for Assets of Defendants AH Media Group, LLC and Henry
11 Block, dated July 31, 2019;
- 12 5. Affidavit of Henry Block Regarding Spousal Property, dated August 12,
13 2019; and
- 14 6. Affidavit of Henry Block Regarding Dynamic Body Solutions 1 LLC
15 Account, dated August 23, 2019.

16 E. The suspension of the judgment will be lifted as to any Stipulating
17 Defendant if, upon motion by the Commission, the Court finds that the Stipulating
18 Defendant failed to disclose any material asset, materially misstated the value of any
19 asset, or made any other material misstatement or omission in the financial
20 representations identified above.

21 F. If the suspension of the judgment is lifted, the judgment becomes
22 immediately due as to that Stipulating Defendant in the amount specified in Subsection A
23 above (which the parties stipulate only for purposes of this Section represents the
24 consumer injury alleged in the Amended Complaint), less any payment previously made
25 pursuant to this Section, plus interest computed from the date of entry of this Order.

26 G. Stipulating Defendants relinquish dominion and all legal and equitable right,
27

1 title, and interest in all assets transferred pursuant to this Order and may not seek the
2 return of any assets.

3 H. The facts alleged in the Amended Complaint will be taken as true, without
4 further proof, in any subsequent civil litigation by or on behalf of the Commission,
5 including in a proceeding to enforce its rights to any payment or monetary judgment
6 pursuant to this Order, such as a nondischargeability complaint in any bankruptcy case.

7 I. The facts alleged in the Amended Complaint establish all elements
8 necessary to sustain an action by the Commission pursuant to Section 523(a)(2)(A) of the
9 Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order will have collateral estoppel
10 effect for such purposes.

11 J. Stipulating Defendants acknowledge that their Taxpayer Identification
12 Numbers (Social Security Numbers or Employer Identification Numbers), which
13 Stipulating Defendants previously submitted to the Commission, may be used for
14 collecting and reporting on any delinquent amount arising out of this Order, in
15 accordance with 31 U.S.C. § 7701.

16 K. All money paid to the Commission pursuant to this Order may be deposited
17 into a fund administered by the Commission or its designee to be used for equitable
18 relief, including consumer redress and any attendant expenses for the administration of
19 any redress fund. If a representative of the Commission decides that direct redress to
20 consumers is wholly or partially impracticable or money remains after redress is
21 completed the Commission may apply any remaining money for such other equitable
22 relief (including consumer information remedies) as it determines to be reasonably
23 related to Defendants' practices alleged in the Amended Complaint. Any money not used
24 for such equitable relief is to be deposited to the U.S. Treasury as disgorgement.
25 Stipulating Defendants have no right to challenge any actions the Commission or its
26 representatives may take pursuant to this Subsection.

1 **VI. CUSTOMER INFORMATION**

2 **IT IS FURTHER ORDERED** that Stipulating Defendants, their officers, agents,
3 employees, and attorneys, and all other persons in active concert or participation with any
4 of them, who receive actual notice of this Order, are permanently restrained and enjoined
5 from directly or indirectly:

6 A. Failing to provide sufficient customer information to enable the Commission
7 to efficiently administer consumer redress. Stipulating Defendants represent that they
8 have provided all redress information in their possession or control to the Commission.
9 If a representative of the Commission requests in writing any information related to
10 redress, Stipulating Defendants must provide it, in the form prescribed by the
11 Commission, within 14 days.

12 B. Disclosing, using, or benefitting from customer information, including the
13 name, address, telephone number, email address, social security number, other
14 identifying information, or any data that enables access to a customer's account
15 (including a credit card, bank account, or other financial account), that any Defendant
16 obtained prior to entry of this Order in connection online transactions promoting or
17 offering for sale any good or service with a Negative Option Feature.

18 C. Failing to destroy such customer information in all forms in their possession,
19 custody, or control within 30 days after receipt of written direction to do so from a
20 representative of the Commission.

21 *Provided, however,* that customer information need not be disposed of, and may be
22 disclosed, to the extent requested by a government agency or required by law, regulation,
23 or court order.

24 **VII. COOPERATION**

25 **IT IS FURTHER ORDERED** that Stipulating Defendant must fully cooperate
26 with representatives of the Commission in this case and in any investigation related to or

1 associated with the transactions or the occurrences that are the subject of the Amended
2 Complaint. Stipulating Defendant must provide truthful and complete information,
3 evidence, and testimony. Individual Defendant must appear and Corporate Defendant
4 must cause its officers, employees, representatives, or agents to appear for interviews,
5 discovery, hearings, trials, and any other proceedings that a Commission representative
6 may reasonably request upon 5 days written notice, or other reasonable notice, at such
7 places and times as a Commission representative may designate, without the service of a
8 subpoena.

9 **VIII. RECEIVERSHIP TERMINATION**

10 **IT IS FURTHER ORDERED** that the appointment of the Receiver over the
11 Defendants pursuant to Section XIV of the Preliminary Injunction is hereby continued as
12 modified by this Section.

13 A. The Receiver is directed and authorized to accomplish the following within
14 one hundred and twenty (120) days after entry of this Order, but any party or the
15 Receiver may request that the Court extend the Receiver's term for good cause:

16 1. Complete the process of taking custody, control, and possession of all
17 assets of Receivership Entities, pursuant to Sections XV.B and XV.C of the Preliminary
18 Injunction;

19 2. Complete the liquidation of all assets of Receivership Entities.

20 3. Prepare and submit a final report describing the Receiver's activities
21 pursuant to this Order, and a final application for compensation and expenses; and

22 4. Distribute to Plaintiff, by wire transfer pursuant to directions provided
23 by counsel for the Commission, or as otherwise agreed to in writing by counsel for the
24 Commission, all remaining assets of the receivership estate in this matter at the
25 conclusion of the Receiver's duties and after payment of allowed compensation and
26 expenses to the Receiver.

1 B. Upon completion of the above tasks, the duties of the Receiver shall
2 terminate.

3 **IX. DISSOLUTION OF ASSET FREEZE**

4 **IT IS FURTHER ORDERED** that the freeze on assets of Defendants imposed
5 pursuant to the Temporary Restraining Order entered on July 18, 2019 (Dkt. #26) and the
6 Preliminary Injunction entered on August 28, 2019 (Dkt. #52), is modified to permit the
7 payments and other transfers identified in Section V above. Upon completion of all
8 payments and other obligations identified in Sections V and VIII above, the asset freeze
9 is dissolved as to Stipulating Defendants. A financial institution shall be entitled to rely
10 upon a letter from a representative of the Commission stating that the freeze on a
11 Stipulating Defendant's assets has been lifted.

12 **X. ORDER ACKNOWLEDGEMENTS**

13 **IT IS FURTHER ORDERED** that Stipulating Defendants obtain
14 acknowledgments of receipt of this Order:

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

18 B. For 5 years after entry of this Order, the Individual Defendant for any
19 business that such Individual Defendant, individually or collectively with any other
20 Defendants, is the majority owner or controls directly or indirectly, and each Corporate
21 Defendant, must deliver a copy of this Order to: (1) all principals, officers, directors, and
22 LLC managers and members; (2) all employees having managerial responsibilities for
23 conduct related to the subject matter of the Order and all agents and representatives who
24 participate in conduct related to the subject matter of the Order; and (3) any business
25 entity resulting from any change in structure as set forth in the Section titled Compliance
26

1 Reporting. Delivery must occur within 7 days of entry of this Order for current
2 personnel. For all others, delivery must occur before they assume their responsibilities.

3 C. From each individual or entity to which a Stipulating Defendant delivered a
4 copy of this Order, that Stipulating Defendant must obtain, within 30 days, a signed and
5 dated acknowledgment of receipt of this Order.

6 **XI. COMPLIANCE REPORTING**

7 **IT IS FURTHER ORDERED** that Stipulating Defendants make timely
8 submissions to the Commission:

9 A. One year after entry of this Order, each Stipulating Defendant must submit a
10 compliance report, sworn under penalty of perjury.

11 1. Each Stipulating Defendant must: (a) identify the primary physical,
12 postal, and email address and telephone number, as designated points of contact, which
13 representatives of the Commission may use to communicate with Stipulating Defendant;
14 (b) identify all of that Stipulating Defendant's businesses by all of their names, telephone
15 numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of
16 each business, including the goods and services offered, the means of advertising,
17 marketing, and sales, and the involvement of any other Defendant in this matter (which
18 each Individual Defendant must describe if he knows or should know due to his own
19 involvement); (d) describe in detail whether and how that Stipulating Defendant is in
20 compliance with each Section of this Order; and (e) provide a copy of each Order
21 Acknowledgment obtained pursuant to this Order, unless previously submitted to the
22 Commission.

23 2. Additionally, each Individual Defendant must: (a) identify all
24 telephone numbers and all physical, postal, email and Internet addresses, including all
25 residences; (b) identify all business activities, including any business for which that
26 Individual Defendant performs services whether as an employee or otherwise and any

1 entity in which that Individual Defendant has any ownership interest; and (c) describe in
2 detail the Individual Defendant's involvement in each such business, including title, role,
3 responsibilities, participation, authority, control, and any ownership;

4 B. For 10 years after entry of this Order, each Stipulating Defendant must
5 submit a compliance notice, sworn under penalty of perjury, within 14 days of any
6 change in the following:

7 1. Each Stipulating Defendant must report any change in: (a) any
8 designated point of contact; or (b) the structure of any Corporate Defendant or any entity
9 that Stipulating Defendant has any ownership interest in or controls directly or indirectly
10 that may affect compliance obligations arising under this Order, including: creation,
11 merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages
12 in any acts or practices subject to this Order.

13 2. Additionally, each Individual Defendant must report any change in:
14 (a) name, including aliases or fictitious name, or residence address; or (b) title or role in
15 any business activity, including any business for which the Individual Defendant
16 performs services, whether as an employee or otherwise, and any entity in which
17 Individual Defendant has any ownership interest, and identify the name, physical address,
18 and any Internet address of the business or entity.

19 C. Each Stipulating Defendant must submit to the Commission notice of the
20 filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or
21 against such Stipulating Defendant within 14 days of its filing.

22 D. Any submission to the Commission required by this Order to be sworn under
23 penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as
24 by concluding: "I declare under penalty of perjury under the laws of the United States of
25 America that the foregoing is true and correct. Executed on: _____" and supplying
26 the date, signatory's full name, title (if applicable), and signature.

1 E. Unless otherwise directed by a Commission representative in writing, all
2 submissions to the Commission pursuant to this Order must be emailed to
3 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate
4 Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission,
5 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin:
6 *FTC v. AH Media Group, LLC, et al.*, FTC Matter No. X190034.

7 **XII. RECORDKEEPING**

8 **IT IS FURTHER ORDERED** that Stipulating Defendants must create certain
9 records for 10 years after entry of the Order, and retain each such record for 5 years.
10 Specifically, Stipulating Defendants for any business that such Stipulating Defendant,
11 individually or collectively with any other Defendant in this matter, is a majority owner
12 or controls directly or indirectly, must create and retain the following records:

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

14 B. Personnel records showing, for each person providing services, whether as
15 an employee or otherwise, that person's: name; addresses; telephone numbers; job title or
16 position; dates of service; and (if applicable) the reason for termination;

17 C. Records of all consumer complaints and refund requests, whether received
18 directly or indirectly, such as through a third party, and any response;

19 D. All records necessary to demonstrate full compliance with each provision of
20 this Order, including all submissions to the Commission; and

21 E. A copy of each unique advertisement or other marketing material.

22 **XIII. COMPLIANCE MONITORING**

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

1
2
3 **XIV. RETENTION OF JURISDICTION**

4 **IT IS FURTHER ORDERED** that this Court retain jurisdiction of this matter for
5 purposes of construction, modification, and enforcement of this Order.

6 **SO ORDERED** this ____ day of _____, 2020.
7
8
9

10 _____
11 Honorable James Donato
12 United States District Judge

13 **SO STIPULATED AND AGREED:**
14

15 **FEDERAL TRADE COMMISSION**
16

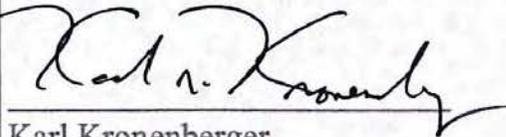
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18 Date: 5/06/2020

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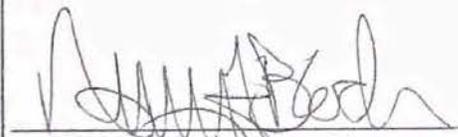
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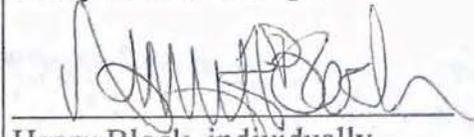
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STIPULATING DEFENDANTS:



Date: 03/26/20

AH Media Group, LLC by
Henry Block, Manager



Date: 03/26/20

Henry Block, individually