

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

FEDERAL TRADE COMMISSION and

OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiffs,

v.

STARWOOD CONSULTING, LLC, a limited
liability company, also d/b/a CORPORATE
COMPLIANCE SERVICES,

CORPORATE POSTER SUPPLY, LLC, a limited
liability company, also d/b/a CORPORATE
COMPLIANCE SERVICE CENTER,
CORPORATE COMPLIANCE SERVICES
CENTER, and WORKPLACE COMPLIANCE
SERVICES,

STARWOOD CAPITAL, LLC, a limited liability
company, also d/b/a STARWOOD
MANAGEMENT SERVICES, and

THOMAS HENRY FRED, JR., individually and as
an officer of STARWOOD CONSULTING, LLC,

Defendants.

Case No. 4:18-cv-02368

**PLAINTIFFS' UNOPPOSED MOTION TO ENTER STIPULATED ORDER FOR
PERMANENT INJUNCTION AND MONETARY RELIEF**

The Federal Trade Commission and the Office of the Attorney General, State of Florida, Department of Legal Affairs, respectfully submit the attached proposed Stipulated Order for Permanent Injunction and Monetary Judgment ("Stipulated Order"), which has been signed by Defendants, Starwood Consulting, LLC, Corporate Poster Supply, LLC, Starwood Capital, LLC, and Thomas Henry Fred, Jr., and Defendants' counsel, and Plaintiffs' counsel.

The Stipulated Order resolves all matters in dispute between Plaintiffs and Defendants in this action. Plaintiffs' counsel recommended the Stipulate Order to their respective entities, the Florida Attorney General and the full Commission, and both entities have now reviewed and approved the Stipulated Order. Therefore, Plaintiffs respectfully request that this Court enter the Stipulated Order.

Respectfully submitted,

Dated: December 9, 2019

ALDEN F. ABBOTT
General Counsel
DAMA J. BROWN
Regional Director

/s/ Luis Gallegos
LUIS H. GALLEGOS
Attorney in Charge
Oklahoma Bar No. 19098
REID TEPFER
Texas Bar No. 24079444
Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, Texas 75201
(214) 979-9383; lgallegos@ftc.gov
(214) 979-9395; rtepfer@ftc.gov
(214) 953-3079 (fax)

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

ASHLEY MOODY
ATTORNEY GENERAL
/s/ Laura Boeckman
Laura J. Boeckman, Esq.
Attorney in Charge
FBN# 527750
Assistant Attorney General
North Florida Bureau Chief
1300 Riverplace Blvd., Suite 405

Jacksonville, Florida 32207
Phone: (904) 348-2720
Fax: (904) 858-6918
Service email:
oag.ec.jax@myfloridalegal.com
Corres. Email:
laura.boeckman@myfloridalegal.com
Counsel for Plaintiff, Office of the
Attorney General, State of Florida,
Department of Legal Affairs

CERTIFICATE OF SERVICE

The undersigned certifies that on December 9, 2019, a true and correct copy of the foregoing document was electronically filed with the clerk of the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court. All attorneys of record were served by pursuant to the ECF notice generated by the Court.

/s/ Luis Gallegos _____
Luis H. Gallegos