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2018 JUL 18 PM 1:55

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

FEDERAL TRADE COMMISSION;

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

CALIFORNIA OFFICE OF THE ATTORNEY
GENERAL;

STATE OF MARYLAND BY THE ATTORNEY
GENERAL OF MARYLAND AND THE
SECRETARY OF STATE OF MARYLAND;

STATE OF MINNESOTA BY ITS ATTORNEY
GENERAL LORI SWANSON;

STATE OF OHIO, ex rel. MIKE DEWINE,
OHIO ATTORNEY GENERAL, CHARITABLE
LAW SECTION; and

STATE OF OREGON, BY ELLEN F.
ROSENBLUM, OREGON ATTORNEY
GENERAL,

Plaintiffs,

v.

HELP THE VETS, INC., a Florida Corporation,
also d/b/a AMERICAN DISABLED VETERANS
FOUNDATION, INC., MILITARY FAMILIES
OF AMERICA, VETERANS EMERGENCY
BLOOD BANK, VETERANS FIGHTING
BREAST CANCER, and VETS FIGHTING
BREAST CANCER; and

NEIL G. PAULSON, SR., individually and as an
officer of HELP THE VETS, INC.,

Defendants.

CASE NO. _____

6:18-cv-1153-Orl-41KRS

**PLAINTIFFS' UNOPPOSED
MOTION REQUESTING ENTRY
OF STIPULATED FINAL
JUDGMENT AND PERMANENT
INJUNCTION AGAINST HELP
THE VETS, INC., AND NEIL G.
PAULSON, SR.**

Pursuant to Local Rule 3.08(a) of the United States District Court for the Middle District of Florida, Plaintiffs, the Federal Trade Commission and the Attorneys General of the States of Florida, California, Maryland, Minnesota, Ohio, and Oregon (all collectively referred to as “Plaintiffs”), respectfully move for entry of the proposed Stipulated Final Judgment and Permanent Injunction against Help the Vets, Inc., and Neil G. Paulson, Sr. (“Stipulated Judgment”). The Stipulated Judgment is attached as Exhibit “A” and may be entered at this time without further hearing.

The parties to this matter have agreed to settle the case and stipulate to entry of the Stipulated Judgment without further notice to any party or other proceedings. No party has requested a hearing.

I hereby certify, in accordance with Local Rule 3.01(g) of the United States District Court for the Middle District of Florida, that counsel for the Plaintiffs have conferred with counsel for the Defendants, and counsel for the Defendants confirm Defendants agree to the relief sought in this motion. I also certify that the Plaintiffs and their attorneys of record have agreed to this motion and the relief sought, and that the Federal Trade Commission and the Attorneys General of the States of California, Maryland, Minnesota, Ohio, and Oregon have authorized the Florida Attorney General to file this motion on behalf of all Plaintiffs.

WHEREFORE, Plaintiffs the Federal Trade Commission and the Attorneys General of the States of Florida, California, Maryland, Minnesota, Ohio, and Oregon move for this Court’s entry of the Stipulated Judgment.

Respectfully submitted,

FOR PLAINTIFFS THE FEDERAL TRADE
COMMISSION AND THE ATTORNEYS
GENERAL OF FLORIDA, CALIFORNIA,
MARYLAND, MINNESOTA, OHIO, AND
OREGON,

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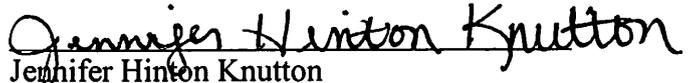
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STATE OF FLORIDA
DEPARTMENT OF LEGAL AFFAIRS

Dated: 7/17/18

CERTIFICATE OF SERVICE

I certify that on July 18, 2018, a true and correct copy of the foregoing was served by CM/ECF, email, or mail on the following: Counsel for Help the Vets, Inc., Douglas L. Kilby, Esq. and Pamela C. Marsh, Esq. of Ausley & McMullen, PA, located at 123 South Calhoun Street, Tallahassee, Florida 32301, via email at dkilby@ausley.com and pmarsh@ausley.com; and Counsel for Neil G. Paulson, Sr., Vincent A. Citro, Esq. of Law Office of Horwitz & Citro, P.A., located at 17 East Pine Street, Orlando, Florida 32801, via email at vince@horwitzcitrolaw.com.

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