

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Civil Action No. 0:18-cv-60990-Williams-Valle

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

GLOBAL CONCEPTS LIMITED, INC., a
corporation, also d/b/a Global TV Concepts, Ltd.;

GCL PRODUCT HOLDINGS LLC, a limited
liability company;

MSA 30X LLC, a limited liability company; and

LAURIE BRADEN, individually, and as an
officer of Global Concepts Limited, Inc. and GCL
Product Holdings LLC, and as trustee of the
Laurie Braden Revocable Trust,

Defendants.

PLAINTIFF'S NOTICE OF SETTLEMENT

Plaintiff, the Federal Trade Commission, hereby advises the Court that the parties to this matter have agreed to settle this case. Attached to this Notice for review and entry by the Court is the following document signed by all parties or their attorneys: [PROPOSED]

STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT.

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Respectfully submitted,

ALDEN F. ABBOTT
Acting General Counsel

Dated: 5/2/18

/s/Michael J. Davis
MICHAEL J. DAVIS (Special Bar A5501005)
KRISTIN M. WILLIAMS (Special Bar A5501648)
Federal Trade Commission
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served by electronic mail and Federal Express on 5/2/18 on all counsel or parties of record on the Service List below.

/s/Michael J. Davis

Service List

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Attorney for Defendants

**UNITED STATES DISTRICT COURT
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LAURIE BRADEN, individually, and as an
officer of Global Concepts Limited, Inc. and GCL
Product Holdings LLC, and as trustee of the
Laurie Braden Revocable Trust,

Defendants.

**[PROPOSED] STIPULATED ORDER FOR PERMANENT INJUNCTION AND
MONETARY JUDGMENT**

Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint for Permanent Injunction and Other Equitable Relief (“Complaint”), for a permanent injunction and other equitable relief in this matter, pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). The Commission and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants participated in deceptive acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, in the labeling, advertising, marketing, promotion, distribution, and sale of MSA 30X, a Wearable Sound Amplifier Product.
3. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.
4. Defendants waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to bear their own costs and attorney fees.
5. Defendants and the Commission waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

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

A. **“Defendants”** means the Individual Defendant and the Corporate Defendants, individually, collectively, or in any combination.

1. **“Corporate Defendants”** means Global Concepts Limited, Inc., a corporation, also d/b/a Global TV Concepts, Ltd.; GCL Product Holdings LLC, a limited liability company; and MSA 30X LLC, a limited liability company, and their successors and assigns.

2. **“Individual Defendant”** means Laurie Braden, including as trustee of the Laurie Braden Revocable Trust.

B. **“Device”** means an instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent, or other similar or related article, including any component, part, or accessory, which is (1) recognized in the official National Formulary, or the United States Pharmacopeia, or any supplement to them; (2) intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease, in humans or other animals; or (3) intended to affect the structure or any function of the body of humans or other animals; and which does not achieve any of its principal intended purposes through chemical action within or on the body of humans or other animals and which is not dependent upon being metabolized for the achievement of any of its principal intended purposes.

C. **“Including”** means including but not limited to.

D. **“Wearable Sound Amplifier Product”** means an electronic product designed to amplify sounds in one or more environments by way of a wearable earpiece connected to an electronic circuitry unit and further comprising microphone, speaker, and/or control components.

ORDER

I.

PROHIBITED REPRESENTATIONS REGARDING FALSE OR UNSUBSTANTIATED HEARING CLAIMS

IT IS ORDERED that Defendants, Defendants’ officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the manufacturing, labeling, advertising, marketing, promotion, offering for sale, sale, or distribution

of any Device, are permanently restrained and enjoined from making, expressly or by implication, any representation that such product:

- A. Allows users who have trouble hearing to hear clearly, including when watching television at a moderate volume;
- B. Helps users to hear better, including up to 30 times better; or
- C. Allows users who have trouble hearing to hear clearly without missing a word, whether watching television, enjoying a movie or show, or in crowded places such as restaurants, unless the representation is non-misleading, and, at the time of making such representation, they possess and rely upon competent and reliable scientific evidence substantiating that the representation is true. For purposes of this Section, competent and reliable scientific evidence shall consist of human clinical testing of the Device that is sufficient in quality and quantity based on standards generally accepted by experts in the field of audiology, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true. Such testing must be conducted by researchers qualified by training and experience to conduct such testing. In addition, all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of such testing as described in the Section entitled Preservation of Records Relating to Competent and Reliable Human Clinical Tests or Studies must be available for inspection and production to the Commission.

II.
PROHIBITED REPRESENTATIONS REGARDING ANY DEVICE CLAIMS

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who

receive actual notice of this Order, whether acting directly or indirectly, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Device are permanently restrained and enjoined from making, expressly or by implication, any representation, other than representations covered under the Section of this Order entitled Prohibited Representations Regarding False or Unsubstantiated Hearing Claims, about the health benefits, performance, or efficacy of any Device, unless the representation is non-misleading, and, at the time of making such representation, they possess and rely upon competent and reliable scientific evidence that is sufficient in quality and quantity based on standards generally accepted by experts in the relevant product's technology and performance characteristics, or if a health benefit claim is made, by experts in the relevant disease, condition, or function to which the representation relates, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true.

For purposes of this Section, competent and reliable scientific evidence means tests, analyses, research, or studies (1) that have been conducted and evaluated in an objective manner by experts in the relevant product's technology and performance characteristics, or with respect to health benefit claims, in the disease, condition, or function to which the representation relates; (2) that are generally accepted by such experts to yield accurate and reliable results; and (3) that are randomized, double-blind, and placebo-controlled human clinical testing of the Device, when such experts would generally require such human clinical testing to substantiate that the representation is true. In addition, when such tests or studies are human clinical testing, all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of such testing as set forth in the Section entitled Preservation of

Records Relating to Competent and Reliable Human Clinical Tests or Studies must be available for inspection and production to the Commission.

**III.
PROHIBITED REPRESENTATIONS REGARDING TESTS OR STUDIES**

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the manufacturing, labeling, advertising, marketing, promotion, offering for sale, sale, or distribution of any product are permanently restrained and enjoined from misrepresenting, in any manner, expressly or by implication, including through the use of any product name, endorsement, depiction, or illustration:

- A. That the product is proven to help users hear better;
- B. That the performance or benefits of any product are scientifically or independently proven or otherwise established; or
- C. The existence, contents, validity, results, conclusions, or interpretations of any test, study, or other research.

**IV.
PRESERVATION OF RECORDS RELATING TO COMPETENT AND RELIABLE
HUMAN CLINICAL TESTS OR STUDIES**

IT IS FURTHER ORDERED that, with regard to any human clinical test or study ("test") upon which Defendants rely to substantiate any claim covered by this Order, Defendants shall secure and preserve all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of the test, including:

A. All protocols and protocol amendments, reports, articles, write-ups, or other accounts of the results of the test, and drafts of such documents reviewed by the test sponsor or any other person not employed by the research entity;

B. All documents referring or relating to recruitment; randomization; instructions, including oral instructions, to participants; and participant compliance;

C. Documents sufficient to identify all test participants, including any participants who did not complete the test, and all communications with any participants relating to the test; all raw data collected from participants enrolled in the test, including any participants who did not complete the test; source documents for such data; any data dictionaries; and any case report forms;

D. All documents referring or relating to any statistical analysis of any test data, including any pretest analysis, intent-to-treat analysis, or between-group analysis performed on any test data; and

E. All documents referring or relating to the sponsorship of the test, including all communications and contracts between any sponsor and the test's researchers.

Provided, however, the preceding preservation requirement does not apply to a reliably reported test, unless the test was conducted, controlled, or sponsored, in whole or in part by: (1) any Defendant; (2) any Defendant's officers, agents, representatives, or employees; (3) any other person or entity in active concert or participation with any Defendant; (4) any person or entity affiliated with or acting on behalf of any Defendant; or (5) the supplier or manufacturer of any product at issue.

For purposes of this Section, “reliably reported test” means a report of the test has been published in a peer-reviewed journal, and such published report provides sufficient information about the test for experts in the relevant field to assess the reliability of the results.

For any test conducted, controlled, or sponsored, in whole or in part, by Defendants, Defendants must establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of any personal information collected from or about participants. These procedures must be documented in writing and must contain administrative, technical, and physical safeguards appropriate to Corporate Defendants’ size and complexity, the nature and scope of Defendants’ activities, and the sensitivity of the personal information collected from or about the participants.

V.
MONETARY JUDGMENT AND PARTIAL SUSPENSION

IT IS FURTHER ORDERED that:

A. Judgment in the amount of \$47,203,036 is entered in favor of the Commission against Individual Defendant and Corporate Defendants, jointly and severally, as equitable monetary relief.

B. Defendants are ordered to pay to the Commission \$500,000 in two installments. The first installment must be made in the amount of \$250,000 due on or before the expiration of 90 days after entry of this Order. The second installment must be made in the amount of \$250,000 due on or before the expiration of 365 days after entry of this Order. Such payment must be made by electronic fund transfer in accordance with instructions previously provided by a representative of the Commission. Upon such payment, the remainder of the judgment is suspended, subject to the Subsections below.

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

1. the Financial Statement of Individual Defendant Laurie Braden signed on 1/24/18, including the attachments;
2. the Financial Statement of Corporate Defendant Global Concepts Limited, Inc., signed by Scott Braden as CFO on 1/24/18, including the attachments;
3. the Financial Statement of Corporate Defendant GCL Product Holdings, LLC, signed by Scott Braden as Finance Officer on 1/24/18, including the attachments;
4. the Financial Statement of Corporate Defendant MSA 30X LLC signed by Scott Braden as Record Keeper on 1/25/18, including the attachments; and
5. the additional documentation submitted by letter or email from Defendants' counsel E. Colin Thompson to Commission counsel Michael J. Davis, including:
 - a. letter dated January 29, 2018 and attached financial disclosures and supporting documents;
 - b. letter dated February 2, 2018 and attached gross revenues, sales, and returns information;
 - c. letter dated February 20, 2018 and attached corrected signature page to the Financial Statement of Corporate Defendant MSA 30X LLC, Bank of America account information about the Laurie Braden Revocable Trust, and amended and supplemental answer to interrogatory 6 found in the Civil Investigative Demand issued on November 21, 2016;

d. letter dated March 1, 2018 and attached one-page document described as containing “a 30 and 90 day analysis of the combined cash-basis position of the proposed” defendants and having the electronic file name “GTV-Braden- 90 Day Cash Outlook.pdf”, three-page document labeled “Print AP Vendor Open Activity” in the header, and 28-page document described as “a presentation providing additional detail and notes regarding the financial information” with the electronic file name “GTV-FTC- 90 Day Projection Presentation.pdf”;

e. letter dated March 2, 2018 and attached three-page document labeled “Historical Aged Trial Balance . . . Payables Management” in the header and with the electronic file name “Accounts Payable Summary (3-2-18).pdf”; and

f. email dated March 2, 2018 at 2:37 pm and attached two-page document described as containing “a description of the nature of the services provided by each vendor” and with the electronic file name “GTV-Vendor List.pdf”.

D. The suspension of the judgment will be lifted as to any Defendant if, upon motion by the Commission, the Court finds that Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the financial attestations identified above.

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

VI.
ADDITIONAL MONETARY PROVISIONS

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

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

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

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

E. All money paid to the Commission pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining money for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to Defendants' practices alleged in the Complaint. Any money not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement.

Defendants have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

**VII.
CUSTOMER INFORMATION**

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

A. Failing to provide sufficient customer information to enable the Commission to efficiently administer consumer redress. If a representative of the Commission requests in writing any information related to redress, Defendants must provide it, in the form prescribed by the Commission, within 14 days; and

B. Disclosing, using, or benefitting from customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a customer's account (including a credit card, bank account, or other financial account), that any Defendant obtained prior to entry of this Order in connection with the sale of MSA 30X.

**VIII.
ORDER ACKNOWLEDGMENTS**

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

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

B. For 5 years after entry of this Order, Individual Defendant for any business that such Defendant, individually or collectively with any other Defendants, is the majority owner or controls directly or indirectly, and each Corporate Defendant, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; and (2) all employees, agents, and representatives who participate in the manufacturing, labeling, advertising, promotion, offering for sale, or sale, of any Device.

**IX.
COMPLIANCE REPORTING**

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

A. Sixty days after entry of this Order, each Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Defendant; (b) identify all of that Defendant's 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, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which Individual Defendant must describe if she knows or should know due to her own involvement); (d) describe in detail whether and how that Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.

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

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

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

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

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

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

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: *FTC v. Global Concepts Limited, Inc.*, FTC No. X_____.

X.
RECORDKEEPING

IT IS FURTHER ORDERED that Defendants must create certain records for 10 years after entry of the Order, and retain each such record for 5 years. Specifically, Corporate Defendants, in connection with the labeling, advertising, marketing, promotion, offering for sale, or sale of any product or service and Individual Defendant for any business that such Defendant, individually or collectively with any other Defendants, is a majority owner or controls directly or indirectly, must create and retain the following records:

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

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

C. Records of all consumer complaints and refund requests concerning the subject matter of this Order, whether received directly or indirectly, such as through a third party, and any response;

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

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

XI. COMPLIANCE MONITORING

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

A. Within 14 days of receipt of a written request from a representative of the Commission, each Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. The Commission is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission is authorized to communicate directly with each Defendant. Defendant must permit representatives of the Commission to

interview any employee or other person affiliated with any Defendant who has agreed to such an interview. The person interviewed may have counsel present.

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

D. Upon written request from a representative of the Commission, any consumer reporting agency must furnish consumer reports concerning Individual Defendant, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)(1).

XII.
RETENTION OF JURISDICTION

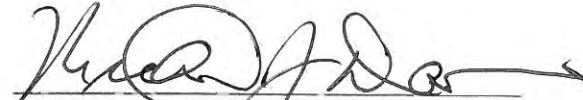
IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED this ____ day of _____, 201__.

UNITED STATES DISTRICT JUDGE

SO STIPULATED AND AGREED:

FOR PLAINTIFF FEDERAL TRADE COMMISSION:



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FOR DEFENDANTS:

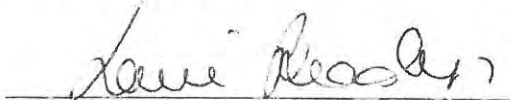


Date: 3/14/18

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Counsel for Defendants

DEFENDANTS GLOBAL CONCEPTS LIMITED, INC., ALSO D/B/A GLOBAL TV CONCEPTS, LTD.; GCL PRODUCT HOLDINGS LLC; MSA 30X LLC; and LAURIE BRADEN:



Date: 3/14/18

LAURIE BRADEN, individually
and as an officer of GLOBAL CONCEPTS LIMITED, INC., GCL PRODUCT HOLDINGS LLC, and MSA 30X LLC, and as Trustee of the LAURIE BRADEN REVOCABLE TRUST