

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

**CASE NO. 18-61017-CIV-ALTONAGA/McAliley**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**POINTBREAK MEDIA, LLC; et al.,**

Defendants.

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**FINAL ORDER OF PERMANENT INJUNCTION AND MONETARY JUDGMENT AS  
TO DEFENDANTS DUSTIN PILLONATO AND JUSTIN RAMSEY**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), filed its First Amended Complaint for Permanent Injunction and Other Equitable Relief (“First Amended Complaint”) [ECF No. 109] stating claims under section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. section 53(b), and section 6 of the Telemarketing and Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. section 6105. On December 18, 2018, Plaintiff filed a Motion for Summary Judgment Against Defendants Dustin Pillonato and Justin Ramsey [ECF No. 228], which the Court granted in an April 4, 2019 Order [ECF No. 258].

Consistent with that Order, final judgment is entered in favor of Plaintiff and against Defendants Pillonato and Ramsey as follows:

**FINDINGS**

A. The Court has jurisdiction over the subject matter and the parties under 28 U.S.C. sections 1331, 1337(a), and 1345; and 15 U.S.C. sections 45(a) and 53(b).

B. Venue is proper as to all parties in this district under 28 U.S.C. sections 1391(b)(2), (b)(3), and (d); and 15 U.S.C. section 53(b).

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C. The First Amended Complaint states a claim upon which relief may be granted under section 13 of the FTC Act, 15 U.S.C. section 53; and section 6 of the Telemarketing Act, 15 U.S.C. section 6105.

D. On March 11, 2019, the Magistrate Judge Chris McAliley entered a Report and Recommendation [ECF No. 251], recommending that the Court grant the FTC's Motion for Summary Judgment against Defendants Pillonato and Ramsey. On April 4, 2019, the Court entered an Order [ECF No. 258] adopting Judge McAliley's Report and Recommendation and granting the FTC's Motion for Summary Judgment.

E. Defendants Pillonato and Ramsey's activities that are the subject of this lawsuit are in or affecting commerce, as defined in section 4 of the FTC Act, 15 U.S.C. section 44.

F. For the reasons stated in Judge McAliley's Report and Recommendation and the Court's Order granting the FTC's Motion for Summary Judgment, Defendants Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Source Media, LLC; Perfect Image Online LLC; and National Business Listings, LLC ("Pointbreak Defendants") formed a common enterprise. *See, e.g., FTC v. Lanier Law, LLC*, 715 F. App'x 970, 979 (11th Cir. 2017) ("[A] corporate entity can be held liable for the conduct of other entities where the structure, organization, and pattern of a business venture reveal a common enterprise or a maze of integrated business entities." (alteration added)).

G. The Pointbreak Defendants violated section 5 of the FTC Act, 15 U.S.C. section 45, by deceptively marketing and selling to small business owners Google "claiming and verification" and search engine optimization services.

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H. Defendants Pillonato and Ramsey participated in, had authority to control, and had knowledge of or were recklessly indifferent to the Pointbreak Defendants' deceptive marketing and sale of Google "claiming and verification" and search engine optimization services.

I. Defendant Pointbreak Media, LLC engaged in unfair practices in violation of section 5 the FTC Act, 15 U.S.C. section 45, by writing itself unauthorized \$100 checks from at least 280 of its customers' bank accounts. Defendant Ramsey endorsed all of these checks.

J. Defendants Pillonato and Ramsey participated in, had authority to control, and had knowledge of the unauthorized checks that Pointbreak Media, LLC wrote itself from its customers' bank accounts.

K. Defendant Pointbreak Media, LLC was engaged in telemarketing, as defined by the Telemarketing Sales Rule ("TSR"), 16 C.F.R. sections 310.2(aa), (cc), and (dd).

L. Defendant Pointbreak Media, LLC violated the TSR, 16 C.F.R. section 310.4(b)(1)(v), by initiating or causing the initiation of telemarketing calls that delivered prerecorded messages.

M. Defendant Pointbreak Media, LLC violated the TSR, 16 C.F.R. section 310.4(b)(1)(iii)(B), by initiating or causing the initiation of telemarketing calls to consumers whose telephone numbers were on the National Do Not Call Registry ("DNC Registry").

N. Defendants Pillonato and Ramsey had authority to control, and they participated in and had knowledge of Pointbreak Media, LLC's unlawful telemarketing.

O. In light of Defendants Ramsey's and Pillonato's conduct, their violations of prior court orders and their operation of the Pointbreak Defendants, there is a cognizable danger that

they will continue to engage in activities in violation of the FTC Act and the TSR unless permanently enjoined from such acts and practices.

P. Equitable monetary relief is warranted against Defendants Ramsey and Pillonato. The proper measure of monetary liability as to Defendants Ramsey and Pillonato is the amount of the Pointbreak Defendants' net revenues, which is their gross receipts minus refunds. *See F.T.C. v. Washington Data Resources, Inc.*, 704 F.3d 1323, 1327 (11th Cir. 2013).

Q. The Pointbreak Defendants' net revenues (i.e., gross revenues less chargebacks and refunds) are at least \$3,367,666.30.

R. Defendants Pillonato and Ramsey are jointly and severally liable for equitable monetary relief in the amount of \$3,367,666.30.

#### DEFINITIONS

For purposes of this Order, the following definitions apply:

A. "**Defendants**" means all of the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination.

B. "**Individual Defendants**" means Dustin Pillonato; Justin Ramsey; Aaron Michael Jones, a/k/a Michael Aaron Jones and Mike Jones; Ricardo Diaz; Michael Pocker; Steffan Molina; Vincent Yates; and Daniel Carver, individually, collectively, or in any combination.

C. "**Corporate Defendants**" means Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Internet Marketing LLC; Modern Source Media, LLC; Perfect Image Online LLC; Allstar Data, LLC; National Business Listings, LLC; and Pinnacle Presence LLC, and their successors and assigns, individually, collectively, or in any combination.

D. **“Receiver”** means Jonathan E. Perlman, Esq., who the Court appointed as Receiver in Section XI of the Preliminary Injunction as to Defendants Dustin Pillonato; Justin Ramsey; Aaron Michael Jones; Michael Pocker; Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Internet Marketing LLC; and Modern Source Media, LLC (*see* [ECF No. 64]); in Section XI of the Preliminary Injunction as to Defendants Steffan Molina and Perfect Image Online LLC [ECF No. 58]; and in Section XI of the Preliminary Injunction as to Defendants Allstar Data, LLC; National Business Listings, LLC; Pinnacle Presence LLC; Vincent Yates; and Daniel Carver [ECF No. 169].

E. **“Remotely Created Payment Order”** means any check, draft, remotely-created check, payment instruction, or payment order, whether in written or electronic format, that is drawn on a payor’s account, initiated or created by or on behalf of the payee, and deposited into or cleared through the check clearing system. For purposes of this definition, an account includes any financial account or credit or other arrangement that allows checks, payment instructions, or orders to be drawn against it that are payable by, through, or at a bank.

F. **“Search Engine Optimization Service or Product”** means any service, product, plan, or program represented, expressly or by implication, to improve a consumer’s rankings or visibility in search engine results or increase the quantity or quality of traffic directed to a consumer through search engine results.

G. **“Telemarketing”** means any plan, program, or campaign which is conducted to induce the purchase of goods, services, or charitable contributions, by use of one or more telephones, and which involves a telephone call, whether or not covered by the TSR.

**ORDER**

**I. PERMANENT BAN ON TELEMARKETING**

Defendants Pillonato and Ramsey, whether acting directly or through an intermediary, are permanently restrained and enjoined from:

- A. participating in Telemarketing, including by consulting, brokering, planning, or advising; and
- B. Owning or controlling, holding a managerial post in, consulting for, serving as an officer in, having any revenue sharing agreement with, or holding any ownership interest, share, or stock in, other than the stock of a publicly traded company, any company that participates in Telemarketing, including by consulting, brokering, planning, or advising.

**II. PERMANENT BAN ON USING REMOTELY CREATED PAYMENT ORDERS TO DEBIT CONSUMER ACCOUNTS**

Defendants Pillonato and Ramsey are permanently restrained and enjoined, whether acting directly or through an intermediary, from debiting or attempting to debit any consumer's bank or financial account using a Remotely Created Payment Order.

**III. PERMANENT BAN ON SEARCH ENGINE OPTIMIZATION SERVICES OR PRODUCTS**

Defendants Pillonato and Ramsey are permanently restrained and enjoined, whether acting directly or through an intermediary, from advertising, marketing, promoting, offering for sale, or selling any Search Engine Optimization Service or Product.

**IV. PROHIBITION AGAINST MISREPRESENTATIONS**

Defendants Pillonato and Ramsey; their officers, agents, servants, employees, and attorneys; and all other persons in active concert or participation with any of the foregoing, who receive actual notice of this Order, whether acting directly or indirectly, in connection with

promoting or offering for sale any good or service, are permanently restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication:

- A. that they are authorized by, or affiliated with, Google or any other individual or entity;
- B. that any consumer is in danger of being removed from any internet search results or marked closed by Google or any other individual or entity;
- C. any material aspect of any refund, cancellation, exchange or repurchase policy, including the likelihood of a consumer obtaining a full or partial refund, or the circumstances in which a full or partial refund will be granted to the consumer; or
- D. any other fact material to consumers concerning any good or service, such as: the total costs; any material restrictions, limitations, or conditions; or any material aspect of its performance, efficacy, nature, or central characteristics.

**V. MONETARY JUDGMENT AS TO DEFENDANTS  
PILLONATO AND RAMSEY**

A. Judgment in the amount of **\$3,367,666.30** is entered in favor of the Commission and against Defendants Pillonato and Ramsey, jointly and severally, as equitable monetary relief. Defendants Pillonato and Ramsey are ordered to pay the Commission this amount immediately upon entry of this Order.

B. In partial satisfaction of this judgment, Defendants Pillonato and Ramsey, immediately upon entry of this Order, shall take all steps necessary to transfer possession, custody, and control to the Receiver of the assets listed below.

- 1. White Gold Diamond Tennis Bracelet, 14 kit, 13.10 DWT, approx. 6.3cts, 7.5 inches long;
- 2. Rolex 116333, Black Roman Numeral Dial;
- 3. Rolex 116334, #8N8M9651, Scramble Serial, Blue Dial;

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4. Rolex 116523, #Y527218, 18kt, 99.80 DWT, Two Tone Rolex Dayton Gold Dial;
5. 3.25ct Diamond Bezel for DateJust II;
6. Hublot 45mm Unico Model 411.NM.1170.RX;
7. "Cartier Love Bracelet," 276 diamonds, 4.25 cts, 18k Yellow Gold;
8. 18k Rose Gold Rolex DayDate II;
9. Gold DayDate 2 Full Diamonds, approx 40cts;
10. Pavé "Love Bracelet" Rose Gold, 276 Diamonds, 5.5cts;
11. Diamond Cartier Nail Bracelet;
12. Matching His and Hers Rose Gold "Cartier" Style Nail Bracelets;
13. (2) Rose Gold DayDate II President Links;
14. (2) Diamond DayDate 2 Links;
15. Breitling A17364, #1395326, Breitling SuperOcean II;
16. Rolex 116244/116200 Oyster, #V764119, Rolex, Silver Dial, 2008;
17. Breitling for Bentley 6.75, White Dial;
18. Rolex 116200, #Z131385, Rolex DateJust, Black Roman Dial, 2006;
19. Gold Coins/Bullion: Canadian Gold Maple, 1ozt;
20. Gold Coins/Bullion: Gold Panda, 1ozt;
21. Gold Coins/Bullion: 1ozt 1980 Gold Maple Leaf;
22. Gold Coins/Bullion: 1 Gold Maple Leaf, 2 Gold Pandas, 1 AGE, 1 Krugg;
23. Breitling Super Avenger, Diamond Dial, Diamond Bezel, Diamond Lugs, 6ct total;



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24. Rolex 116880, #Z9715053, Stainless Steel Rolex Yachtmaster II Model 116680;
25. TAG Heuer Ladies' Link, MOP Diamond Dial with Factory Diamond Bezel;
26. Breitling Super Avenger, #2167190; Breitling Super Avenger Stainless Steel with White Dial;
27. Gold Coins/Bullion: (7) 1 ozt Pamp Bars;
28. Cartier Roadster XL Chronograph;
29. Rolex 178274, #M323508, Mid Size 31mm DJ;
30. Rolex Deepsea Dweller, #M870981, with extra link;
31. Rolex 326935, #G95367T0, 18kt, 169.80 DWT, Rolex 18k Rose Gold Sky-Dweller;
32. Rolex 116244/116200, #V764119, Oyster, Silver Dial, 2008;
33. SS Yachtmaster II;
34. Panerai PAM000 #L0277/1000, Men's Panerai Pam000, Black Dial, Brown Leather Strap;
35. Rolex 116300, #Scramble, Rolex DateJust II, Black Diamond Dial with 3.25 ctw Bead Set Diamond Bezel Set in 18kwt;
36. Rolex 116300, #Scramble, Rolex DateJust II, Silver Arabic Dial with Purple Numbers, 3.25 ctw Bead Set Diamond Bezel Set in 18kwt;
37. Men's Two Tone 41mm Rolex DateJust Model 116333 G Serial, Slate Dial, with Green Roman Numerals;

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38. (2) 18k Yellow Gold Dog Tag Pendants with 18kwtg Beaded Necklace, 40 inches long;
39. Hublot King Power Titanium, 48mm;
40. Audemars Piguet Royal Oak OffShore, 44mm Carbon Ceramic;
41. Rolex Yachtmaster II Two tone, Model 116618;
42. Rose Gold, DayDate President, Oyster Bracelet, Factory Diamond Dial, 36mm;
43. New Rolex Yacht-Master II, Two Tone, Rose;
44. Breitling A17364, #1395326, Breitling SuperOcean II;
45. 1.01ct E/SII GIA Certified Cushion Cut Diamond;
46. 14k White Gold Cushion shape diamond halo semi mount totaling .68cts for 1.01 ct GIA (6212749823) Cushion Cut Diamond;
47. Rolex 116810LV, #063E29Q7, Green Ceramic Submariner 116610LV, dated Nov. 2015;
48. Rolex 116610, X0239F623, Stainless Steel Rolex Submariner 116610, Black Dial/Black Bezel, with 3 extra links;
49. 18k Rose Gold Diamond Bezel for Rolex DayDate;
50. 18K White Gold Diamond Cartier Style Love Bracelet;
51. Complete AP ROO 42mm Navy;
52. Hublot King Power Bayern Munich FC;
53. Breitling with Diamond Bezel; and
54. All items that are or were possessed, owned, or held for the benefit of Defendants Pillonato or Ramsey, and that are or were contained in a safe.

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C. The Receiver shall liquidate all assets transferred to the Receiver pursuant to this Order. After payment to the Receiver of any expenses approved by the Court, all proceeds from the liquidation of those assets shall be paid to the Commission. The Receiver is excused from the requirements of 28 U.S.C. sections 2001 and 2004 in connection with any pending or contemplated sale by the Receiver.

D. Any entity or person, including Pillonato and Ramsey or any financial institution holding Defendants Pillonato and Ramsey's assets, must transfer those assets to the Commission or Receiver, in accordance with instructions provided by a representative of the Commission, within seven days of receiving notice of this Order.

E. The freeze against the assets of Defendants Pillonato and Ramsey pursuant to the May 8, 2018 Temporary Restraining Order [ECF No. 12], the May 21, 2018 Order Extending the Temporary Restraining Order [ECF No. 23], and the June 7, 2018 Preliminary Injunction [ECF No. 64] is modified only with respect to Defendants Pillonato and Ramsey. Specifically, once all of Defendant Pillonato and Ramsey's frozen assets are transferred in accordance with Subsections A, B, and C, the asset freeze will dissolve with respect to Defendants Pillonato and Ramsey.

F. Defendants Ramsey and Pillonato shall take all steps necessary to assist in the transfer of all frozen assets, including those identified in Subsections B and C. If it is necessary to execute additional documents to transfer, liquidate, or assign Defendant Pillonato and Ramsey's assets or any other assets surrendered under this Order, Defendants Pillonato and Ramsey shall execute such documents within three days of a request from a representative of the Commission.

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G. Defendants Pillonato and Ramsey's Taxpayer Identification Numbers (such as their Social Security Numbers), which they previously submitted to the Commission, may be used by the Receiver or the Commission for collecting and reporting on any delinquent amount arising out of this Order, consistent with 31 U.S.C. section 7701.

H. Defendants Pillonato and Ramsey are deemed to have granted to the Commission all rights and claims they have to any assets currently in the possession, custody, or control of the Receiver, and to any other asset of any Corporate Defendant.

I. Defendants Pillonato and Ramsey relinquish dominion and all legal and equitable right, title, and interest in all assets transferred under this Order and may not seek the return of any assets.

J. All money paid to the Commission under 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 First Amended Complaint. Any money not used for such equitable relief is to be deposited to the United States Treasury as disgorgement. Defendants Pillonato and Ramsey have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

## **VI. CUSTOMER INFORMATION**

Defendants Pillonato and Ramey; their officers, agents, employees, and attorneys; and all other persons in active concert or participation with any of the foregoing, who receive actual notice of this Order, whether acting directly or indirectly, are hereby ordered to:

- A. 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 Pillonato and Ramsey must provide it, in the form prescribed by the Commission, within 14 days.
- B. not disclose, use, or benefit 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 or used prior to entry of this Order in connection with the marketing and sale of Google "claiming and verification" and search engine optimization services;
- C. destroy such customer information in all forms in their possession, custody, or control within 30 days after receipt of written direction to do so from a representative of the Commission.

Provided, however, that Pillonato and Ramsey need not dispose of customer information and may disclose it, to the extent requested by a government agency or required by law, regulation, or court order.

## **VII. ORDER ACKNOWLEDGMENTS**

Defendants Pillonato and Ramsey must each obtain acknowledgments of receipt of this Order, as set forth below:

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A. Defendants Pillonato and Ramsey, within seven days of entry of this Order, must each submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For 10 years after entry of this Order, Defendants Pillonato and Ramsey, for any business that either of them, individually or collectively with each other or any other Defendant, is the majority owner or controls directly or indirectly, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for conduct related to the subject matter of the Order and all agents and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in Section VIII (Compliance Reporting). Defendants Pillonato and Ramsey must deliver a copy of this Order to current personnel within 7 days of entry of this Order. For all others, Defendants Pillonato and Ramsey must make delivery before those individuals assume their responsibilities.

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

### **VIII. COMPLIANCE REPORTING**

Defendants Pillonato and Ramsey shall each make timely submissions to the Commission as follows:

A. One year after entry of this Order, Defendants Pillonato and Ramsey must each submit a compliance report, sworn under penalty of perjury. The compliance report must:

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1. identify all telephone numbers and all physical, postal, email and Internet addresses, including all residences, of the Defendant submitting the report;
2. identify all business activities, including any business for which the Defendant submitting the report performs services, whether as an employee or otherwise, and identify any entity in which such Defendant has any ownership interest;
3. describe in detail that Defendant's involvement in each business, including title, role, responsibilities, participation, authority, control, and any ownership;
4. identify the Defendant's primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with the Defendant submitting the report;
5. identify that Defendant's businesses by all their names, telephone numbers, and physical, postal, email, and Internet addresses;
6. 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 in this lawsuit (which the Defendant submitting the report must describe if he knows or should know due to his own involvement);
7. describe in detail whether and how the Defendant submitting the report is in compliance with each Section of this Order; and
8. provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.

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B. For 20 years after entry of this Order, Defendants Pillonato and Ramsey must each submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:

1. his name, including aliases or fictitious names or his residence address;
2. his title or role in any business activity, including any business for which he performs services whether as an employee or otherwise, and any entity in which he has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity;
3. any designated point of contact; and
4. the structure of any entity that he has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: the 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.

C. Defendants Pillonato and Ramsey each must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against him 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. section 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," and supplying the date, signatory's full name, title (if applicable), and signature.



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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 United States 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. Pointbreak Media*, X180031.

**IX. RECORDKEEPING**

Defendants Pillonato and Ramsey shall each create certain records for 20 years after entry of the Order and retain each such records for a five year period. Specifically, for any business that Defendants Pillonato or Ramsey, individually or collectively with each other or any other Defendants, is a majority owner or controls directly or indirectly, he 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, 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, including sales scripts.

## **X. COMPLIANCE MONITORING**

For the purpose of monitoring Defendants Pillonato and Ramsey's compliance with this Order, including 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, Defendants Pillonato and Ramsey must each: (i) submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; (ii) appear for depositions; and (iii) 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. Notwithstanding the provisions of Local Rule 26.1(i), the Commission is not required to provide notice to Defendants Pillonato or Ramsey of, or make available for inspection by Defendants Pillonato or Ramsey, any objections, documents, electronically stored information, or things received in response to a subpoena.

B. For matters concerning this Order, the Commission is authorized to communicate directly with Defendants Pillonato and Ramsey. Defendants Pillonato and Ramsey each must permit representatives of the Commission to interview any employee or other person affiliated with him who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission may use all other lawful means to enforce this Order, including posing, through its representatives, as consumers, suppliers, or other individuals or entities, to Defendants Pillonato and Ramsey or any individual or entity affiliated with any of them, without the necessity of identification or prior notice. Nothing in this Order limits the

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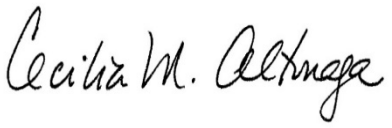
Commission's lawful use of compulsory process, under sections 9 and 20 of the FTC Act, 15 U.S.C. sections 49, 57b-1.

D. Upon written request from a representative of the Commission, any consumer reporting agency must furnish consumer reports concerning Defendants Pillonato and Ramsey, under the Fair Credit Reporting Act, 15 U.S.C. section 1681b(a)(1).

**XI. RETENTION OF JURISDICTION**

The Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

**DONE AND ORDERED** in Miami, Florida, this 25th day of April, 2019.

  
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**CECI**  
**UNITED STATES DISTRICT JUDGE**

cc: counsel of record  
Justin Ramsey (*pro se*)  
Dustin Pillonato (*pro se*)