

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman
Terrell McSweeney



In the Matter of

Sanford Health,
a corporation;

Sanford Bismarck,
a corporation;

and

Mid Dakota Clinic, P.C.,
a corporation.

Docket No. 9376

**UNOPPOSED EXPEDITED MOTION FOR FURTHER CONTINUANCE OF
ADMINISTRATIVE PROCEEDINGS PENDING APPEAL OF ORDER GRANTING
MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Rule 3.41 of the Federal Trade Commission’s (“FTC” or “Commission”) Rules of Practice, Respondents Sanford Health, Sanford Bismarck (collectively “Sanford”) and Mid Dakota Clinic, P.C. (“MDC”) move for a further continuance of the commencement of the administrative hearing in the above-captioned matter, currently scheduled to begin on January 17, 2018, as well as of related pre-hearing deadlines, pending resolution of Respondents’ appeal of the District’s Court’s order granting the Commission’s and North Dakota Attorney General’s (“NDAG”) motion for preliminary injunction entered on December 13, 2017 (the “PI Order”). Respondents filed their notice of appeal of the PI Order on December 15, 2017. The parties have conferred, and Complaint Counsel does not oppose Respondents’ motion.

ARGUMENT

In August 2016, Sanford and MDC agreed that Sanford would acquire MDC. At the time, the parties agreed to make reasonable best efforts to close the transaction by January 1, 2017. In early November 2016, MDC and Sanford learned that the Federal Trade Commission was investigating the transaction, and the parties thereafter agreed to postpone closing the transaction pending the FTC's investigation. On June 23, 2017, Complaint Counsel and the NDAG filed a complaint in the United States District Court of North Dakota, Western Division, seeking a preliminary injunction to enjoin the transaction until completion of this administrative proceeding. Sanford and MDC stipulated to the entry of a temporary restraining order which provides that the proposed transaction may not be consummated "until after 11:59 pm eastern time on the fifth business day after the Court rules on the Plaintiffs' motion for a preliminary injunction." Order Adopting Stipulated TRO [Docket No. 7], *FTC v. Sanford Health*, No. 1:17-cv-00133-ARS (D.N.D.). A four-day preliminary injunction hearing concluded on November 3, 2017, and proposed findings of fact and conclusions of law were filed on November 13, 2017.

On December 13, 2017, the District Court granted the Commission's and NDAG's motion for a preliminary injunction. On December 15, 2017, Respondents filed a notice of appeal of the District Court's PI Order [Exhibit 1]. Under Eighth Circuit Rule of Appellate Procedure 11A and standard Eighth Circuit practice, Respondents' opening brief will be due within 40 days after filing of the docket entries, the response brief will be due 30 days later, and the reply brief will be due 14 days after the due date for appellees' brief. While the filing of the docket entries has not occurred as of the date of this motion, Respondents intend to file their opening brief no later than January 29, 2018, regardless of when the docket entries are filed.

The Commission has issued prior continuances in this case in light of Respondents' representation that they intend to abandon the transaction if the transaction is enjoined after exhaustion of appeals, and because of the public interest in avoiding sizeable costs in preparing for and holding a hearing that would be entirely unnecessary if the injunction is upheld. On November 3, 2017, the Commission issued an Order Granting 14-Day Continuance in this proceeding ("Nov. 3 Order") [Exhibit 2]. The Commission cited declarations from Sanford's Chief Legal Officer and MDC's CEO—"that if, after all appeals in the injunction proceedings are exhausted, they are enjoined from consummating the acquisition, they will abandon the transaction." *Id.* at 1 (citing Respondents' October 6, 2017 Expedited Motion for a Two-Month Stay of Administrative Proceedings at 2-3, Exhibits A-B). The order further stated that "the public interest is not ideally served if litigants and third parties bear expenditures that later prove unnecessary." *Id.* at 2

On November 21, 2017, the Commission issued an "Order Granting Further Continuance of Administrative Proceedings" ("Nov. 21 Order") [Exhibit 3]. In that order, and pursuant to the joint motion of the parties, the Commission extended the deadline for the administrative hearing to commence on January 17, 2018, while also extending related pre-hearing deadlines by 36 days. The Commission again referenced Respondents' representation that "if, after all appeals in the injunction proceedings are exhausted they are enjoined from consummating the acquisition, they will abandon the transaction." *Id.* at 1. Further, the Commission again observed that "the public interest is not ideally served if litigants and third parties bear expenditures that later prove unnecessary." *Id.* at 2.

Extension of the continuance until the resolution of Respondents' pending appeal is warranted for the following reasons:

1. If after all appeals in the injunction proceedings are exhausted Respondents are enjoined from consummating the acquisition, the Respondents will abandon their merger and this administrative proceeding will be moot. *See* Respondents' October 6, 2017 Expedited Motion for a Two-Month Stay of Administrative Proceedings at 2-3, Exhibits A-B.
2. Absent an extension of the continuance, the parties—and, importantly, third parties—will be required to devote significant resources to meeting various interim deadlines between now and January 17, 2018 (the current commencement date for the administrative hearing), including extensive document and data review, redaction and motion practice relating to the *in camera* treatment of commercially sensitive information, much of which comes from non-parties to this matter. Incurrence of these costs would be unnecessary if the District Court's PI Order is upheld.
3. Absent an extension of the continuance, non-party witnesses (as well as party witnesses)—virtually all of whom reside outside of the Washington, D.C. area—will need to incur significant expenses, including legal fees, associated with preparation for the administrative hearing and travel costs. Incurrence of these costs would be unnecessary if the District Court's PI Order is upheld.
4. Absent an extension of the continuance, the parties will incur significant costs and expenditures, including legal and expert witness fees in the case of Respondents, for the hearing itself. Incurrence of these costs would be unnecessary if the District Court's PI Order is upheld.
5. Absent an extension of the continuance, the Office of the Administrative Law Judge will be required to devote time and resources to pre-hearing preparation, adjudication

- of issues for the hearing, and conducting the hearing. Incurrence of these costs would be unnecessary if the District Court's PI Order is upheld.
6. In this proceeding, the Commission has twice correctly observed that "the public interest is not ideally served if litigants and third parties bear expenditures that later prove unnecessary." Nov. 3 Order at 2; Nov. 21 Order at 2.
 7. Under the existing schedule, and even though Respondents filed their notice of appeal less than 48 hours after the District Court's PI Order, the administrative hearing is certain to commence before the Eighth Circuit Court of Appeals can adjudicate the appeal of the injunction. Thus, only a further continuance can obviate the incurrence of the various costs discussed above.
 8. Today, and throughout the pendency of the appeal, the transaction will be enjoined; thus, there will be no prejudice from granting the stay.
 9. Accordingly, granting the stay will prevent the parties, third parties, and Office of the Administrative Law Judge from incurring sizeable costs that would be entirely unnecessary if the injunction is upheld following exhaustion of appellate options, without causing any prejudice.
 10. Complaint Counsel has authorized Respondents' to represent to the Commission that Complaint Counsel does not oppose this motion.

Moreover, granting the further continuance sought here is consistent with prior Commission decisions to stay administrative proceedings in *In the matter of Advocate Health Care Network*, Docket No. 9369, Order Granting Continuance, at 2 (June 28, 2016) (noting Respondents' commitment to abandon the transaction if the FTC prevailed in federal court) and *In the matter of The Penn State Hershey Medical Center*, Docket No. 9368, Commission Order

Granting Continuance (June 10, 2016). In both of these cases, the Commission continued the administrative hearing throughout the duration of the respective appeals and, in both cases, the transactions were abandoned after the FTC prevailed on appeal.

RELIEF REQUESTED

For all of the foregoing reasons, Respondents respectfully request that the Commission exercise its discretion under Rule 3.41 to continue commencement of the administrative hearing until twenty-one (21) days after the resolution of the pending appeal. Respondents also request that interim pre-hearing deadlines be continued for the same period of time.

Dated: December 18, 2017

/s/ Robert M. Cooper

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Counsel to Mid Dakota Clinic, P.C.

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman
Terrell McSweeney**

In the Matter of

**Sanford Health,
a corporation;**

**Sanford Bismarck,
a corporation;**

and

**Mid Dakota Clinic, P.C.,
a corporation.**

Docket No. 9376

**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION FOR FURTHER
CONTINUANCE OF ADMINISTRATIVE PROCEEDINGS PENDING APPEAL OF
ORDER GRANTING MOTION FOR PRELIMINARY INJUNCTION**

Good cause having been shown,

IT IS HEREBY ORDERED THAT Respondents' Unopposed Motion for Further Continuance of Administrative Proceedings is **GRANTED**; and the evidentiary hearing in this matter is continued until 21 days after the United States Court of Appeals for the Eighth Circuit renders its judgment on Respondents' appeal of the District Court's order granting the Federal Trade Commission and North Dakota Attorney General's motion for a preliminary injunction, and that all remaining pre-hearing deadlines shall be extended until after the Court of Appeals renders its judgment, as determined by the Administrative Law Judge.

By the Commission.

Donald S. Clark
Secretary

ISSUED:

CERTIFICATE OF SERVICE

I certify that on December 18, 2017, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580

The Honorable S. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-110
Washington, DC 20580

I also certify that I delivered via electronic mail a copy of the foregoing document to:

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Counsel to Mid Dakota Clinic, P.C.

Dated: December 18, 2017

By: /s/ Hershel Wancjer
Hershel Wancjer

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
WESTERN DIVISION**

FEDERAL TRADE COMMISSION

and

STATE OF NORTH DAKOTA,

Plaintiffs,

v.

SANFORD HEALTH,

SANFORD BISMARCK,

and

MID-DAKOTA CLINIC, P.C.,

Defendants.

Case No. 1:17-cv-00133-ARS

Notice of Appeal

DEFENDANTS' NOTICE OF APPEAL

Notice is hereby given that Sanford Health, Sanford Bismarck, and Mid-Dakota Clinic, defendants in the above captioned case, hereby appeal to the United States Court of Appeals for the Eighth Circuit from the order granting plaintiffs' motion for a preliminary injunction entered in this action on the thirteenth day of December, 2017.

Dated: December 15, 2017

Respectfully submitted,

/s/ Robert M. Cooper

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Samuel Kaplan, *pro hac vice*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 15, 2017, I electronically filed the foregoing document via the Court's electronic filing system, which will automatically send e-mail notification of this filing to all attorneys of record in this action.

/s/ James A. Kraehenbuehl
James A. Kraehenbuehl

EXHIBIT 2

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Maureen K. Ohlhausen, Acting Chairman**
 Terrell McSweeney

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Sanford Health,)	Docket No. 9376
 a corporation;)	
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Sanford Bismarck,)	
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 a corporation.)	
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ORDER GRANTING 14-DAY CONTINUANCE

On October 6, 2017, Respondents Sanford Health, Sanford Bismarck, and Mid Dakota Clinic, P.C. moved to postpone commencement of the administrative hearing in this proceeding from November 28, 2017 to January 30, 2018, and to stay all pre-hearing deadlines for two months. *See* Expedited Motion for a Two-Month Stay of Administrative Proceedings (“Respondents’ Motion”). On October 12, 2017, Complaint Counsel responded that Respondents have not shown good cause for the requested relief and consequently opposed Respondents’ Motion.¹

Respondents argue that a ruling in a parallel action brought by the Federal Trade Commission in federal district court – seeking a preliminary injunction barring Respondents from merging or acquiring each other’s assets or other interests, pending final disposition of this administrative proceeding – will obviate the need for the administrative hearing. In particular, Respondents state that if, after all appeals in the injunction proceedings are exhausted, they are enjoined from consummating the acquisition, they will abandon the transaction. Respondents’ Motion at 2-3, Exhibits A-B. Respondents further assert that, if the district court denies an injunction, they will move under Commission Rule 3.26 to withdraw the case from adjudication or to dismiss the administrative proceeding. Respondents’ Motion at 4-5. Respondents argue that under either scenario, deferring commencement of the administrative hearing is likely to avoid the expenditure of resources by Respondents, Complaint Counsel, and third parties on administrative litigation that may prove unnecessary. *Id.* at 2-4.

¹ On October 13, 2017, Respondents moved for leave to file a reply to Complaint Counsel’s opposition filing. That motion is GRANTED.

Commission Rule 3.41(f) provides, in relevant part, that a pending “collateral federal court action that relates to the administrative adjudication shall not stay the proceeding . . . [u]nless a court of competent jurisdiction, or the Commission for good cause, so directs.” 16 C.F.R. § 3.41(f). The administrative hearing is scheduled to begin November 28, 2017. The proposed findings of fact for the preliminary injunction hearing are due to be filed on November 10, 2017, and a decision is expected sometime thereafter. Presently, it is not clear whether the two proceedings will in fact overlap.

As reflected in its Rules of Practice, the Commission has committed to moving forward as expeditiously as possible with administrative hearings on the merits. *See, e.g.*, 16 C.F.R. §§ 3.1, 3.11(b)(4), 3.41, 3.46, 3.51-3.52. A two-month delay of the long-scheduled administrative hearing would interfere with that objective in a manner not warranted by present circumstances. At the same time, the public interest is not ideally served if litigants and third parties bear expenditures that later prove unnecessary. Under the circumstances presented, we find that a short continuance is justified. Deferring the start of trial by fourteen days – to December 12, 2017 – and extending remaining pre-hearing deadlines by the same fourteen-day interval – provide additional time for resolution of the district court action without materially delaying the Commission proceeding. We have granted similar, short continuances under comparable circumstances in the past. *See In re Advocate Health Care Network*, 2016 WL 2997850 (F.T.C. May 6, 2016) (granting continuance when “the district court hearing on the Commission's motion for preliminary injunction ha[d] yet to conclude”). Respondents and/or Complaint Counsel, of course, may seek extension of this continuance based on future circumstances. Accordingly,

IT IS HEREBY ORDERED that Respondents’ Expedited Motion for a Two-Month Stay of Administrative Proceedings is **GRANTED IN PART**; and

IT IS FURTHER ORDERED that the evidentiary hearing in this proceeding shall commence on December 12, 2017, and that, unless modified by the Chief Administrative Law Judge, all related pre-hearing deadlines shall be extended by 14 days.

By the Commission.

Donald S. Clark,
Secretary

SEAL:
ISSUED: November 3, 2017

EXHIBIT 3

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman
 Terrell McSweeney**

In the Matter of)	
)	
Sanford Health,)	
a corporation;)	
)	
Sanford Bismarck,)	Docket No. 9376
a corporation;)	
)	
and)	
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Mid Dakota Clinic, P.C.,)	
a corporation.)	
)	

**ORDER GRANTING FURTHER CONTINUANCE
OF ADMINISTRATIVE PROCEEDINGS**

On November 14, 2017, Complaint Counsel and Respondents Sanford Health, Sanford Bismarck, and Mid Dakota Clinic, P.C. jointly moved to postpone commencement of the administrative hearing in this proceeding from December 12, 2017 to January 17, 2018, and to stay all pre-hearing deadlines by corresponding periods. *See* Joint Expedited Motion for Further Continuance of Administrative Proceedings (“Joint Motion”).

The parties argue that “absent an extension of the continuance, the parties – and, importantly, third parties – will be required to devote significant resources to meeting various interim deadlines between now and December 12, 2017 (the current commencement date for the administrative hearing), including extensive document and data review.” Joint Motion at 3. The parties also argue that “many non-party (and Respondents’) witnesses who may be called to testify live are practicing physicians, and a brief stay will provide sufficient time for them to reschedule patient care and/or secure alternative coverage.” Joint Motion at 3. Further, Respondents reiterate that if, after all appeals in the injunction proceedings are exhausted they are enjoined from consummating the acquisition, they will abandon the transaction. Joint Motion at 4.

The preliminary injunction hearing and post-hearing filings have concluded in the pending district court action. *Id.* at 2. The parties do not know when the district court will issue its decision regarding a preliminary injunction, but Judge Senechal stated at the conclusion of the

hearing that she had a goal to provide a decision within a few weeks. *Id.* The administrative hearing before Judge Chappell is currently scheduled to begin December 12, 2017.

Commission Rule 3.41(f) provides, in relevant part, that a pending “collateral federal court action that relates to the administrative adjudication shall not stay the proceeding . . . [u]nless a court of competent jurisdiction, or the Commission . . . so directs.” 16 C.F.R. § 3.41(f). This reflects the Commission’s commitment to move forward as expeditiously as possible with administrative hearings on the merits. *See, e.g.*, 16 C.F.R. §§ 3.1, 3.11(b)(4), 3.41, 3.46, 3.51-3.52.

Yet, as we explained in our Order of November 3, 2017, the public interest is not ideally served if litigants and third parties bear expenditures that later prove unnecessary. Consequently, we previously granted a short continuance of fourteen days – to December 12, 2017 – to provide additional time for resolution of the district court action without materially delaying the Commission proceeding. Under the present circumstances, where the district court has concluded its hearing and has stated a goal to provide an opinion shortly, we again conclude that a limited continuance to allow time for resolution of the judicial proceedings is warranted. Accordingly,

IT IS HEREBY ORDERED that the Joint Expedited Motion for Further Continuance of Administrative Proceedings is **GRANTED**; and

IT IS FURTHER ORDERED that the evidentiary hearing in this proceeding shall commence on January 17, 2018, and that, unless modified by the Chief Administrative Law Judge, all related pre-hearing deadlines shall be extended by 36 days.

By the Commission.

Donald S. Clark,
Secretary

SEAL:
ISSUED: November 21, 2017

Notice of Electronic Service

I hereby certify that on December 18, 2017, I filed an electronic copy of the foregoing Unopposed Expedited Motion for Further Continuance of Administrative Proceedings, with:

D. Michael Chappell
Chief Administrative Law Judge
600 Pennsylvania Ave., NW
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Donald Clark
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I hereby certify that on December 18, 2017, I served via E-Service an electronic copy of the foregoing Unopposed Expedited Motion for Further Continuance of Administrative Proceedings, upon:

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