

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

WEALTHPRESS HOLDINGS LLC, a
limited liability company;

INVESTPUB LLC, a limited liability
company;

CONOR LYNCH, individually and as an
officer of WEALTHPRESS HOLDINGS
LLC; and

ROGER SCOTT, individually and as an
officer of WEALTHPRESS HOLDINGS
LLC

Defendants.

Case No. 3:23-cv-00046

**STIPULATED ORDER FOR
PERMANENT INJUNCTION,
MONETARY JUDGMENT,
CIVIL PENALTY JUDGMENT,
AND OTHER RELIEF**

Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint for Permanent Injunction, Monetary Relief, Civil Penalties, and Other Relief (“Complaint”), for a permanent injunction, monetary relief, civil penalties, and other relief in this matter, pursuant to Sections 5(m)(1)(A)-(B), 13(b), and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(m)(1)(A)-(B), and 53(b), and 57b, Section 5 of the Restore Online Shoppers’ Confidence Act (“ROSCA”), 15 U.S.C. § 8404. The Commission and Defendants stipulate to the

entry of this Stipulated Order for Permanent Injunction, Monetary Judgment, Civil Penalty Judgment, and Other Relief (“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 and unfair acts or practices that violate Section 5 of the FTC Act, 15 U.S.C. § 45, and Section 4 of ROSCA, 15 U.S.C. § 8403, and that the Commission has previously determined to be unfair or deceptive in connection with the advertising, marketing, distribution, and selling of trade recommendation services and related goods and services to consumers throughout the United States.
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. **“Billing Information”** means any data that enables any person to access a customer’s account, such as a credit card, checking, savings, share or similar account, utility bill, mortgage loan account, or debit card.

B. **“Charge” or “Charged”** means any attempt to collect money or other consideration from a consumer, including causing Billing Information to be submitted for payment, including against the consumer’s credit card, debit card, bank account, telephone bill, or other account.

C. **“Clear(ly) and Conspicuous(ly)”** means that a required disclosure is difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers, including in all of the following ways:

1. In any communication that is solely visual or solely audible, the disclosure must be made through the same means through which the communication is presented. In any communication made through both visual and audible means, such as a television advertisement, the disclosure must be presented simultaneously in both the visual and audible portions of the communication even if the representation requiring the disclosure is made in only one means.

2. A visual disclosure, by its size, contrast, location, the length of

time it appears, and other characteristics, must stand out from any accompanying text or other visual elements so that it is easily noticed, read, and understood.

3. An audible disclosure, including by telephone or streaming video, must be delivered in a volume, speed, and cadence sufficient for ordinary consumers to easily hear and understand it.

4. In any communication using an interactive electronic medium, such as the Internet or software, the disclosure must be unavoidable.

5. The disclosure must use diction and syntax understandable to ordinary consumers and must appear in each language in which the representation that requires the disclosure appears.

6. The disclosure must comply with these requirements in each medium through which it is received, including all electronic devices and face-to-face communications.

7. The disclosure must not be contradicted or mitigated by, or inconsistent with, anything else in the communication.

8. When the representation or sales practice targets a specific audience, such as children, the elderly, or the terminally ill, “ordinary consumers” includes reasonable members of that group.

D. **“Defendants”** means all of the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination.

1. **“Corporate Defendants”** means WealthPress Holdings LLC, InvestPub LLC, and their successors and assigns.

2. **“Individual Defendants”** means Conor Lynch and Roger Scott, individually, collectively, or in any combination.

E. **“Earnings Claim”** means any representation to consumers, specific or general, about income, financial gains, percentage gains, profit, net profit, gross profit, or return on investment. Earnings Claims include, but are not limited to: (a) the details of specific profitable trades, whether actual or hypothetical; (b) references to quitting one’s job, not having to work, or living off of income from trading; (c) references to increased purchases or savings, including a home, cars, boats, vacations, or travel; (d) claims that consumers will not lose money if they use a particular trading strategy; (e) claims that profits are likely, probable, or the “mathematical” result of applying a particular trading strategy; (f) any statements, claims, success stories, endorsements, or testimonials about the performance or profitability of representatives, endorsers, instructors or customers; and (g) any representation, even hypothetical, of how much money a consumer could or would earn.

ORDER

I. PROHIBITION CONCERNING EARNINGS 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 promoting or offering for sale any good or service, are permanently restrained and enjoined from making any Earnings Claims or assisting others in making any Earnings Claims, expressly or by implication, unless:

A. The Earnings Claims are non-misleading;

B. At the time the Earnings Claims are made, Defendants:

1. have a reasonable basis for the claim;
2. have in their possession written materials that substantiate the claimed earnings and that the claimed earnings are typical for consumers similarly situated to those to whom the claim is made; and
3. make the written substantiation available upon request to the consumer, potential purchaser, and the FTC; and

C. Any earnings of the Defendants that form the basis for the Earnings Claims were achieved in compliance with the law.

II. PROHIBITION AGAINST MISREPRESENTATIONS REGARDING ALGORITHMS

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

- A. That any person is personally involved in selecting or approving trades that Defendants recommend;
- B. That any person personally discovered or developed an algorithm or strategy that is used to generate trades that Defendants recommend;
- C. That trades that Defendants recommend are more likely to be profitable because of any person's algorithms, expertise, inside knowledge, or personal involvement in selecting such trades;
- D. That any person hired one or more others to develop an algorithm or system used to generate trades, or any other aspect of the development process including the number, qualifications, or role, of the persons involved; or
- E. The amount spent by any person to develop an algorithm or system used

to generate trades.

III. PROHIBITION AGAINST MISREPRESENTATIONS

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

- A. The description of the good or service;
- B. That any past performance referenced in Defendants' advertising, marketing, promoting, offering for sale, or selling of any good or service is indicative of future results;
- C. That any testimonials Defendants use in the advertising, marketing, promoting, offering for sale, or selling of any good or service reflect the experience that consumers are likely to have using Defendants' products or services;
- D. That Defendants provide personalized investment advice;
- E. That purchasers or users of Defendants' products or services will or are likely to achieve substantial profits or earnings;

- F. The risk, liquidity, earnings potential, or profitability of goods or services that are the subject of a sales offer;
- G. The level of experience required for consumers to effectively use Defendants' good or services;
- H. The time or effort required for consumers to effectively use Defendants' goods or services;
- I. The amount of capital required for consumers to effectively use Defendants' goods or services;
- J. That any specific trade in the financial markets was actually made by Defendants or others;
- K. The role or involvement of any person in developing Defendants' goods or services or providing them to purchasers;
- L. The background, expertise, or other information bearing on the skill or accomplishments of any person whose name or likeness is used in marketing Defendants' goods or services to prospective purchasers;
- M. Limitations of any kind on the number of goods or services Defendants will or may sell, or the price at which such goods or services are or will be offered;
- N. That purchase or use of Defendants' goods or services carries little or no risk;

- O. The nature or extent of any back-testing or other testing, research, or analysis of a service or strategy;
- P. Any material aspect of the nature or terms of a refund, cancellation, or exchange policy for the good or service;
- Q. 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.

IV. JUDGMENT FOR MONETARY RELIEF

IT IS FURTHER ORDERED that:

A. Judgment in the amount of One Million Two Hundred Seventy-Two Thousand Three Hundred Fifty-Six Dollars and Twenty-Two Cents (\$1,272,356.22) is entered in favor of the Commission against WealthPress Holdings, LLC, Conor Lynch, and Roger Scott, jointly and severally, as monetary relief.

B. WealthPress Holdings, LLC, Conor Lynch, and Roger Scott are ordered to pay to the Commission One Million Two Hundred Seventy-Two Thousand Three Hundred Fifty-Six Dollars and Twenty-Two Cents (\$1,272,356.22), which, as they stipulate, their undersigned counsel holds in escrow for no purpose other than payment to the Commission. Such payment must

be made within 7 days of entry of this Order by electronic fund transfer in accordance with instructions previously provided by a representative of the Commission.

V. JUDGMENT FOR CIVIL PENALTY

A. Judgment in the amount of Five Hundred Thousand Dollars (\$500,000) is entered in favor of the Commission against Defendant WealthPress Holdings, LLC as a civil penalty.

B. Defendant WealthPress Holdings, LLC is ordered to pay the Commission Five Hundred Thousand Dollars (\$500,000), which, as it stipulates, its undersigned counsel holds in escrow for no purpose other than payment to the Commission. Such payment must be made within 7 days of entry of this Order by electronic fund transfer in accordance with instructions previously provided by a representative of the Commission.

VI. ADDITIONAL MONETARY PROVISIONS

IT IS FURTHER ORDERED that:

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 must submit 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 received by the Commission pursuant to Section IV.A of this Order may be deposited into a fund administered by the Commission or its designee to be used for consumer relief, such as 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 such redress is completed, the Commission may apply any remaining money for such related relief as it determines to be reasonably related to Defendants' practices alleged in the Complaint. Any money not used for relief is to be deposited to the U.S. Treasury as an additional civil penalty. 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, 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 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.

VIII. NOTICE TO CUSTOMERS

IT IS FURTHER ORDERED that, within 7 days of entry of this Order, Defendant WealthPress Holdings, LLC, shall email notice in the form shown in Attachment A to all persons who purchased goods or services marketed or sold by WealthPress Holdings, LLC, of any type at any time between January 1, 2018, and the date of the entry of this Order with the subject line "What the FTC Settlement Means for WealthPress Customers." Notices sent by email shall be sent from an email address that WealthPress Holdings, LLC, regularly uses for communicating with consumers and Defendants shall make commercially reasonable efforts to

leverage technologies to ensure the deliverability of emails (for example, but not limited to, SPF, DKIM, and use of sending IP addresses with known good reputations). Within 15 days of entry of this Order, Defendants shall mail the form shown in Attachment A via first-class mail, postage prepaid with address forwarding requested, to the last known mailing address of any intended email recipient whose emailed message delivery fails. No information other than that contained in Attachment A shall be included in or added to the notice required by this Section, nor shall any other materials be transmitted with the notice.

IX. COOPERATION

IT IS FURTHER ORDERED that Defendants must fully cooperate with representatives of the Commission in this case and in any investigation related to or associated with the transactions or the occurrences that are the subject of the Complaint. Defendants must provide truthful and complete information, evidence, and testimony. Individual Defendants must appear, and such Corporate Defendants must cause their officers, employees, representatives, or agents to appear for interviews, discovery, hearings, trials, and any other proceedings that a Commission representative may reasonably request upon 5 days written notice, or other reasonable notice, at such places and times as a Commission representative may designate, without the service of a subpoena.

X. 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 10 years after entry of this Order, each 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; (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 the Section titled Compliance Reporting. Delivery must occur within 7 days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

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

XI. COMPLIANCE REPORTING

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

A. One year 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 Defendants must describe if they know or should know due to their 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, each 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 20 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, each 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. WealthPress Holdings, Inc. X_____.

XII. RECORDKEEPING

IT IS FURTHER ORDERED that Defendants must create certain records for 20 years after entry of the Order and retain each such record for 5 years.

Specifically, Corporate Defendants and each 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, 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.

XIII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with this Order 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

Defendants, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

XIV. 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 _____, 2022.

UNITED STATES DISTRICT JUDGE

SO STIPULATED AND AGREED:

FEDERAL TRADE COMMISSION



Date: 12/20/2022

Andrew Hudson
ahudson@ftc.gov / (202) 326-2213
Ryan McAuliffe
rmcauliffe@ftc.gov / (202) 326-3404
Attorneys
Federal Trade Commission
600 Pennsylvania Ave NW
Mailstop CC-5201
Washington, DC 20580
Fax: (202) 326-3395

FOR DEFENDANTS:



Date: 10-25-2022

Ari N. Rothman, Esq.
Venable LLP
600 Massachusetts Ave. NW
Washington, DC 20001
(818) 925-6114
anrothman@venable.com

COUNSEL for WealthPress Holdings, LLC

Damon W.D. Wright
Gordon Rees Scully Mansukhani
1101 King Street, Suite 520
Alexandria, VA 22314
(703) 973-8776
dwright@grsm.com

Date: _____

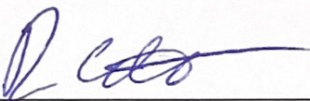
COUNSEL for Invest Pub, LLC

Karl S. Kronenberger
Kronenberger Rosenfeld, LLP
150 Post Street, Ste 520
San Francisco, CA 94108
(415) 955-115 Ext. 114
karl@krinternetlaw.com

Date: _____

COUNSEL for Roger Scott and Conor Lynch

**DEFENDANTS: WealthPress Holdings, LLC, Invest Pub, LLC, Roger Scott,
and Conor Lynch**



Roger Scott, individually
and as an officer of WealthPress Holdings, LLC

Date: 10/25/22

Conor Lynch, individually
and as an officer of WealthPress Holdings, LLC

Date: _____

Damon W.D. Wright

Date: 10/26/2022

Damon W.D. Wright
Gordon Rees Scully Mansukhani
1101 King Street, Suite 520
Alexandria, VA 22314
(703) 973-8776
dwright@grsm.com

COUNSEL for Invest Pub, LLC

Karl S. Kronenberger

Date: 10-24-22

Karl S. Kronenberger
Kronenberger Rosenfeld, LLP
150 Post Street, Ste 520
San Francisco, CA 94108
(415) 955-115 Ext. 114
karl@krinternetlaw.com

COUNSEL for Roger Scott and Conor Lynch

**DEFENDANTS: WealthPress Holdings, LLC, Invest Pub, LLC, Roger Scott,
and Conor Lynch**


Roger Scott, individually
and as an officer of WealthPress Holdings, LLC

Date: _____

Conor Lynch
Conor Lynch (Oct 24, 2022 16:37 EDT)

Date: Oct 24, 2022

Conor Lynch, individually
and as an officer of WealthPress Holdings, LLC



Morgan Busby
as an officer of Invest Pub, LLC

Date: 10-25-22

ATTACHMENT A

Subject: WealthPress Settlement of FTC Deception Case

Dear <Customer>:

Because our records show you've been a customer of our company, we're writing to let you know that the Federal Trade Commission, the nation's consumer protection agency, has sued and reached a settlement with WealthPress, Roger Scott, and others.

What happened?

The FTC sued us and said that our claims about how much people could earn using our programs were deceptive because we didn't have sufficient evidence that customers were likely to earn what we said they could.

What we're doing in response

To settle the lawsuit with the FTC

- **We won't make claims about earnings without written proof.** If we make claims about how much people can earn, we must have written proof that a typical customer is likely to get that kind of result. It also means we can't use testimonials or example trades, like those we have featured in our webinars, that would lead you to believe those experiences are typical unless we have written proof that they are.
- **We won't make claims about the typical experience our customers have without written proof.** That includes what you'd need to participate in our program, like the time commitment and the amount of money or experience required to be successful.

What you should know about investment-related offers

Before you pay for any investment-related service or any offer that includes claims about how much money you can make as a participant, we and the FTC encourage you to

- Take your time.
- Avoid high-pressure sales pitches that require you to act now or risk losing out.
- Be skeptical about success stories and testimonials.
- Do your research. Search online for the company's name plus words like "review," "scam," or "complaint."

We are pleased with the settlement with the FTC and are committed to follow its requirements. We believe that ultimately it will result in a better customer experience for all of our subscribers.

For more information about WealthPress's settlement with the FTC, visit [FTC URL].

Sincerely,

[signature for WealthPress]

WealthPress Holdings, LLC