

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

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMERICANA LIBERTY LLC, a limited liability company, also dba Stand Flag Poles, Stand, and www.standflagpoles.com;

THREE NATIONS CAPITAL LLC, a limited liability company, also dba Americana Flag Poles and www.americanaflagpoles.com;

MAXIMILIANO OJEDA, individually and as an officer of Americana Liberty LLC and Three Nations Capital LLC;

VIRGINIA HILFIGER, individually and as an officer and/or owner of Americana Liberty LLC and Three Nations Capital LLC; and

JULIAN GROVES, individually and as an officer and/or owner of Americana Liberty LLC and Three Nations Capital LLC.

Defendants.

Case No. 26-cv-61085-DSL

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

Plaintiff, the Federal Trade Commission (“Commission”), filed its Complaint for Permanent Injunction, Monetary Judgment, and Other Relief (“Complaint”), for a permanent injunction, monetary relief, and other relief in this matter, pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 53(b) & 57b. The Commission and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction, Monetary 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 in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), 15 U.S.C. § 45a (“Section 45a), the Made in USA Labeling Rule, 16 C.F.R. Part 323, the Textile Fiber Products Identification Act (“Textile Act”), 15 U.S.C. § 70 *et seq.*, and the Rules and Regulations Under the Textile Fiber Products Identification Act, 16 C.F.R. Part 303 (“Textile Rules”), in connection with the labeling and advertising of certain patriotic-themed products, including flagpole kits, flags, related parts and accessories, and fire pits as “Made in the USA,” the failure to provide mandatory country of origin disclosures in the advertising of certain Textile Fiber Products pursuant to Section 70b(i) of the Textile Act and Section 303.34 of the Textile Rules, and the failure to make mandatory labeling disclosures for certain Textile Fiber Products pursuant to Section 70b of the Textile Act and Section 303.16 of the Textile Rules.
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 purposes of this Order, the following definitions apply:

A. **“Clear(ly) and conspicuous(ly)”** means that a required disclosure is easily noticeable (i.e., difficult to miss) and easily understandable by reasonable 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 reasonable 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. On a product label, the disclosure must be presented on the principal display panel.

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

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

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

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

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

C. “**Corporate Defendants**” means Americana Liberty LLC, and Three Nations Capital LLC, and their successors and assigns.

D. “**Individual Defendants**” means Maximiliano Ojeda, Virginia Hilfiger, and Julian Groves.

E. “**Made in the United States**” means any representation, express or implied, that a product or service, or a specified component thereof, is of U.S.-origin, including, but not limited to, a representation that such product or service is “made,” “manufactured,” “built,” “produced,” or “crafted” in the United States or in America, or any other U.S. origin claim.

F. “**Textile Fiber Product**” means any product subject to the Textile Fiber Products Identification Act, 15 U.S.C. §§ 70-70k.

ORDER

I. PROHIBITION AGAINST MISREPRESENTATIONS REGARDING U.S. ORIGIN 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 representing or assisting others in representing, expressly or by implication, that a good or service is Made in the United States unless:

A. The final assembly or processing of the product occurs in the United States, all significant processing that goes into the product occurs in the United States, and all or virtually all ingredients or components of the product are made and sourced in the United States; or

B. A Clear and Conspicuous qualification appears immediately adjacent to the representation that accurately conveys the extent to which the product contains foreign parts, ingredients or components, and/or processing; or

C. For a claim that a product is assembled in the United States, the product is last substantially transformed in the United States, the product's principal assembly takes place in the United States, and United States assembly operations are substantial.

II. PROHIBITION AGAINST MISLEADING OR UNSUBSTANTIATED COUNTRY-OF-ORIGIN REPRESENTATIONS

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 promoting or offering for sale any good or service, are permanently restrained and enjoined from making any representation, expressly or by implication, regarding the country of origin of any product or service unless the representation is non-misleading, including that, at the time such representation is made, Defendants possess and rely upon a reasonable basis for the representation.

III. REQUIRED DISCLOSURE

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 Textile Fiber Product must:

A. If such Textile Fiber Product is imported, label such Textile Fiber Product with the name of the country where the imported product was processed or manufactured.

B. If such Textile Fiber Product is either (1) Made in the United States; (2) Made in the United States in whole or in part of imported materials; or (3) partially manufactured in a foreign country and partially manufactured in the United States, disclose those facts on the product label.

C. In any product description in any mail order catalog or mail order promotional material, Clearly and Conspicuously state whether the Textile Fiber Product is Made in the United States, imported, or both in a manner that is consistent with the origin labeling of the Textile Fiber Product advertised.

D. Label the Textile Fiber Products in accordance with requirements of Section 70b of the Textile Fiber Products Identification Act, 15 U.S.C. § 70b, and Section 303.16 of the Rules and Regulations Under the Textile Fiber Products Identification Act, 16 C.F.R. § 303.16.

**IV. MONETARY JUDGMENT AND PARTIAL
SUSPENSION**

IT IS FURTHER ORDERED that:

A. Judgment in the amount of two million dollars (\$2,000,000.00) is entered in favor of the Commission against Individual Defendants and Corporate Defendants, jointly and severally, as monetary relief.

B. Defendants are ordered to pay to the Commission \$167,743.15, which, as Defendants stipulate, their undersigned counsel holds in escrow for no purpose other than payment to the Commission. Such payment must be made within 14 days of entry of this Order by electronic funds transfer in accordance with instructions to be provided by a representative of the Commission. Upon such payment, the remainder of the judgment in Subsection A 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 representations") submitted to the Commission, namely:

1. the Financial Statement of Individual Defendant Maximiliano Ojeda signed on March 16, 2026, including the attachments;
2. the Financial Statement of Individual Defendant Virginia Hilfiger signed on March 15, 2026, including the attachments;
3. the Financial Statement of Individual Defendant Julian Groves signed on March 16, 2026, including the attachments.

4. the Financial Statement of Corporate Defendant Americana Liberty LLC signed by Maximiliano Ojeda, Virginia Hilfiger, and Julian Groves as Directors on March 16, 2026, including the attachments;

5. The Financial Statement of Corporate Defendant Three Nations Capital LLC signed by Maximiliano Ojeda, Virginia Hilfiger, and Julian Groves as Directors on March 16, 2026, including the attachment;

6. the additional documentation submitted by email from Defendants' counsel Roy Goldberg to Commission counsel Michelle Schaefer and Adrienne Jenkins dated March 18, 2026, attaching bank statements from the Individual Defendant Virginia Hilfiger.

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 representations 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.

V. 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. Each Defendant acknowledges that Defendant's Employer Identification Number, Social Security Number, or other Taxpayer Identification Number ("TIN"), including all TINs which Defendants must submit to the Commission, may be used by the Commission for reporting and other lawful purposes, including collecting 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 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 (including consumer information remedies) 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. Defendants have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

VI. 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, whether acting directly or indirectly, in connection with advertising, promoting, offering for sale, sale, or distribution of the any good or service, are permanently restrained and enjoined from 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.

VII. NOTICE TO CUSTOMERS

IT IS FURTHER ORDERED that Defendants must notify customers as follows:

A. Defendants must identify all consumers who purchased any flagpole kits, flags, or related parts and accessories between December 2024 and February 2026 ("Affected Customers").

1. Such Affected Customers, and their contact information, must be identified to the extent such information is in Defendants' possession, custody, or control;

2. Affected Customers include those identified at any time, including after Defendants' execution of the Agreement through the eligibility period, which runs for 1 year after the date the Order was entered.

B. Defendants must notify all identified Affected Customers by emailing each a notice in the form shown in Attachment A (for Affected Customers who ordered from Defendant Americana Liberty LLC) or Attachment B (for Affected Customers who ordered from Defendant

Three Nations LLC). The email containing the notice may contain a copy of this Order but no other documents or enclosures.

C. Defendants must notify all Affected Customers within 30 days after the date the Order was entered, and any Affected Customers identified thereafter within 30 days of their identification.

D. Defendants must report on their notification program under penalty of perjury:

1. Defendants must submit a report within 60 days of entry of this Order and at the conclusion of the program summarizing its compliance to date.

2. If a representative of the Commission requests any information regarding the program, including any of the underlying customer data, Defendants must submit it within 10 days of the request.

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, 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 country-of-origin claims, and all agents and representatives who participate in country-of-origin claims; 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.

IX. 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 Defendants; (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, any country-of-origin claims made in marketing, 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 Acknowledgement 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. Americana Liberty LLC.

X. 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 Defendant 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 concerning the subject matter of the 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, label, or other marketing material that includes any express or implied Made in the United States claim.

XI. 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 depositions by remote means), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission is authorized to communicate directly with each Defendant. Defendants 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).

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 _____, 2026.

UNITED STATES DISTRICT JUDGE

SO STIPULATED

**FOR PLAINTIFF
THE FEDERAL TRADE COMMISSION:**

/s/ Michelle Schaefer
Michelle Schaefer, Special Bar No. A5501956
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580
Phone: 202-326-3515
Email: mschaefer@ftc.gov

April 14, 2026

Date: _____

Adrienne Jenkins, Special Bar No. A5503483
Federal Trade Commission
1350 Euclid Ave., Suite 325
Cleveland, OH 44115
Phone: 202-326-2515
Email: ajenkins@ftc.gov

**FOR DEFENDANT AMERICANA
LIBERTY LLC, THREE NATIONS
CAPITAL LLC, MAXIMILIANO OJEDA,
VIRGINIA HILLFIGER, JULIAN
GROVES**

/s/ Roy Goldberg
Roy Goldberg
Member
Clark Hill
1001 Pennsylvania Ave. N.W.
Suite 1300 South
Washington, DC 20004
Phone: 202-552-2388
Email: rgoldberg@clarkhill.com

Date: April 6, 2026

Counsel for Americana Liberty LLC, Three
Nations Capital, LLC, Maximiliano Ojeda,
Virginia Hil
*Not admitted in Florida or SD Florida

**DEFENDANTS: AMERICANA LIBERTY
LLC, THREE NATIONS CAPITAL LLC,
AND MAXIMILIANO OJEDA**

Date: 04/06/2026



MAXIMILIANO OJEDA INDIVIDUALLY
AND AS OFFICER OF AMERICANA
LIBERTY LLC AND MANAGING
MEMBER OF THREE NATIONS CAPITAL
LLC

DEFENDANT: VIRGINIA HILFIGER

Date: 04/06/2026



VIRGINIA HILFIGER INDIVIDUALLY

DEFENDANT: JULIAN GROVES

Date: 04.06.2026



JULIAN GROVES INDIVIDUALLY

Attachment A: Notice to Customers

The notification email must be in the following form and from an authorized Americana Liberty LLC email address that contains an Americana Liberty LLC signature line with the sender's full contact information:

Subject: Settlement of FTC Deceptive Made in the USA Advertising and Labeling Case

Dear <Name of customer>:

Our records show that you bought a product from Americana Liberty LLC, that we labeled or advertised as "Made in the USA." We're writing to tell you that the Federal Trade Commission, the nation's consumer protection agency, has sued us for deceptive and false labeling and advertising. According to the FTC, our claim that your product was "Made in the USA" was misleading.

To settle the FTC's lawsuit, we're notifying you that the product you bought was not all or virtually all "Made in the USA." In fact, some of our products — including American Flags, Military Flags, and Flagpole Kits — are wholly-imported or contain significant imported components.

If you have questions about this lawsuit, visit www.standflagpoles.com. For more information about "Made in the USA" advertising and labeling, visit <https://www.ftc.gov/business-guidance/advertising-marketing/made-in-usa>.

Sincerely,

[signature]

[Americana Liberty LLC signature block]

Attachment B: Notice to Customers

The notification email must be in the following form and from an authorized Three Nations LLC email address that contains a Three Nations LLC signature line with the sender's full contact information:

Subject: Settlement of FTC Deceptive Made in the USA Advertising and Labeling Case

Dear <Name of customer>:

Our records show that you bought a product from Three Nations LLC, that we labeled or advertised as "Made in the USA." We're writing to tell you that the Federal Trade Commission, the nation's consumer protection agency, has sued us for deceptive and false labeling and advertising. According to the FTC, our claim that your product was "Made in the USA" was misleading.

To settle the FTC's lawsuit, we're notifying you that the product you bought was not all or virtually all "Made in the USA." In fact, our Americana Flagpole Kits contain significant imported components.

If you have questions about this lawsuit, visit www.americanaflagpoles.com. For more information about "Made in the USA" advertising and labeling, visit <https://www.ftc.gov/business-guidance/advertising-marketing/made-in-usa>.

Sincerely,

[signature]

[Three Nations signature block]

CERTIFICATE OF SERVICE

I, Michelle Schaefer, an attorney for Plaintiff Federal Trade Commission, hereby certify that, on April 14, 2026, I served a true and correct copy of the foregoing *Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief* and attachments on counsel for Defendants Americana Liberty LLC, Three Nations Capital, LLC, Maximiliano Ojeda, Virginia Hilfiger, and Julian Groves via electronic email on:

Roy Goldberg
Member
Clark Hill
1001 Pennsylvania Ave. N.W.
Suite 1300 South
Washington, DC 20004
Phone: 202-552-2388
Email: rgoldberg@clarkhill.com

Counsel for Defendants Americana Liberty LLC,
Three Nations Capital, LLC, Maximiliano Ojeda,
Virginia Hilfiger, and Julian Groves

Dated: April 14, 2026

/s/ Michelle Schaefer

Michelle Schaefer
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
Phone: 202-326-3515
Email: mschaefer@ftc.gov