

FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

## NOTICE OF APPEARANCE



<b>CASE NAME</b>	<b>FILE/DOCKET NUMBER</b>
In the Matter of Philip Serpe	D-9441

Pursuant to Section 4.1 of the Commission's Rules of Practice, I (we) am (are) entering in the above proceeding the appearance of

- ☐ counsel supporting the complaint (Complete Items 1, 3, 4, and 5 below)
- ☒ counsel or representative for the respondent (Complete Items 1, 2, 4, and 5 below)
- ☐ counsel or representative for a third party (Complete Items 1, 2, 4, and 5 below)

### 1. COUNSEL OR REPRESENTATIVE

Include the name, address, email address, and telephone number of each counsel or representative entering an appearance in the above proceeding,

Oliver J. Dunford  
Fla. Bar No. 1017791  
PACIFIC LEGAL FOUNDATION  
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Palm Beach Gardens, FL 33410  
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Christopher Condon  
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Ph: 202.670.3959  
Email: CCondon@pacificlegal.org

### 2. RESPONDENT(S) OR THIRD PARTY(IES)

Include the address and telephone numbers of all persons, partnerships, corporations, or associations on whose behalf this Notice of Appearance is being filed.

Philip Serpe (contacted through counsel)

### 3. ASSOCIATE/ASSISTANT DIRECTOR

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### 4. SIGNATURE OF SENIOR COUNSEL

/s/ Oliver Dunford

### 5. DATE SIGNED

12/4/2025

Return this form to: Federal Trade Commission  
Room H-113  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

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

COMMISSIONERS:     **Andrew N. Ferguson, Chairman**  
                              **Mark R. Meador**

**IN THE MATTER OF**

**PHILIP SERPE,**

**Appellant.**

**MATTER NO. D-9441**

**STATEMENT OF GOOD STANDING PURSUANT TO 16 C.F.R. § 4.1**

In connection with the Notice of Appearance filed on December 3, 2025, and pursuant to 16 C.F.R. § 4.1(d), I state that I am eligible to practice before the Commission as counsel for Philip Serpe.

I am admitted to practice law in the states of Florida (No. 1017791), Ohio (No. 0073933), and California (No. 320143).

I am also admitted to practice before the following federal courts:

- United States Supreme Court;
- United States Courts of Appeals for the Second, Fourth, Fifth, Sixth, Seventh, Ninth, Tenth, Eleventh, District of Columbia, and Federal Circuits;
- United States District Courts for the Central District of California, Northern District of California, District of Colorado, Middle District of Florida, Southern District of Florida, Northern District of Illinois, Northern District of Ohio, Southern District of Ohio, Southern District of Texas, and the United States Court of International Trade.

I remain a member of good standing in all courts identified here.

**PUBLIC**

As requested by 16 C.F.R. § 4.1 (d), I further state that I am a member of good standing within the legal profession.

DATED: December 4, 2025.

Respectfully submitted,

/s/ Oliver J. Dunford

OLIVER J. DUNFORD

Pacific Legal Foundation

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ODunford@pacifical.org

*Attorney for Philip Serpe*

**PUBLIC**

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

COMMISSIONERS:     **Andrew N. Ferguson, Chairman**  
                               **Mark R. Meador**

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In connection with the Notice of Appearance filed on December 3, 2025, and pursuant to 16 C.F.R. § 4.1(d), I state that I am eligible to practice before the Commission as counsel for Philip Serpe. I am admitted to practice before the Supreme Court of Virginia; the United States District Courts for the District of Columbia, Southern District of Texas, and Colorado; the U.S. Court of International Trade; the United States Courts of Appeals for the Third Circuit, Fourth Circuit, Fifth Circuit, Sixth Circuit, Eighth Circuit, Ninth Circuit, Eleventh Circuit, District of Columbia Circuit, and Federal Circuit; and the United States Supreme Court. I am a member in good standing with the Virginia Bar Association (VA No. 91020) and the District of Columbia Bar Association (D.C. No. 229540).

As requested by 16 C.F.R. § 4.1 (d), I further state that I am a member of good standing within the legal profession.

**PUBLIC**

DATED: December 4, 2025.

Respectfully submitted,

/s/ Joshua M. Robbins

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3100 Clarendon Boulevard  
Suite 1000  
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*Attorney for Philip Serpe*

**PUBLIC**

**UNITED STATES OF AMERICA  
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In connection with the Notice of Appearance filed on December 3, 2025, and pursuant to 16 C.F.R. § 4.1(d), I state that I am eligible to practice before the Commission as counsel for Philip Serpe. I am admitted to practice before the United States Court of Federal Claims. I am a member in good standing of the District of Columbia Bar Association (D.C. No. 90017688).

As requested by 16 C.F.R. § 4.1 (d), I further state that I am a member of good standing within the legal profession.

**PUBLIC**

Dated: December 4, 2025.

Respectfully submitted,

/s/ Christopher Condon

CHRISTOPHER CONDON

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Telephone: (202) 670-3959

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*Attorney for Philip Serpe*

**PUBLIC****CERTIFICATE OF SERVICE**

I certify that on December 4, 2025, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of the filing. A courtesy copy will be sent via email to the following:

<p>April Tabor Office of the Secretary Federal Trade Commission 600 Pennsylvania Avenue NW Suite CC-5610 Washington, DC 20580</p>	<p>Hon. D. Michael Chappell Office of Administrative Law Judges Federal Trade Commission 600 Pennsylvania Avenue NW Washington, DC 20580 oalj@ftc.gov electronicfilings@ftc.gov</p>
<p>James Bunting Tyr LLP 488 Wellington Street West, Suite 300-302 Toronto, ON M5V 1E3 jbunting@tyrllp.com</p> <p>John L. Forgy 830 Vermillion Peak Pass Lexington, KY 40515 johnnforgy1@gmail.com</p> <p><i>Counsel for HISA</i></p>	<p>Michelle C. Pujals Allison Farrell 4801 Main Street, Suite 350 Kansas City, MO 64112-2749 afarrell@hiwu.org</p> <p><i>Counsel for HIWU</i></p>
	<p>Bryan H. Beauman Rebecca C. Price Sturgill Turner Barker &amp; Moloney, PLLC 333 W. Vine St., Ste 1500 Lexington, KY 40507 bbeauman@sturgillturner.com rprice@sturgillturner.com</p> <p><i>HISA Enforcement Counsel</i></p>

/s/ Oliver J. Dunford

OLIVER J. DUNFORD