

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:25-cv-20973-LEIBOWITZ/TORRES

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CLICK PROFIT, LLC, *et al.*,

Defendants.

**STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY
JUDGMENT AS TO DEFENDANTS WILLIAM HOLTON AND ECOM DIRECT LLC**

Plaintiff, the Federal Trade Commission (“FTC”), and Defendants William Holton and Ecom Direct, LLC (collectively, “Stipulating Defendants”) have jointly moved this Court for a Stipulated Order for Permanent Injunction and Monetary Judgment (the “Motion”). [ECF No. 143]. Having considered the Motion, the relevant legal authorities, the other filings in this case, by stipulation of the parties and for other cause appearing, the Motion [ECF No. 143] is **GRANTED**. Further, the Court finds and **ORDERS** as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Stipulating 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), the Business Opportunity Rule, the CRFA, and the Impersonation Rule, in the marketing and promotion of their online e-commerce store business opportunities.

3. Stipulating 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, Stipulating Defendants admit the facts necessary to establish jurisdiction.

4. Stipulating 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. Stipulating Defendants and the FTC 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. “**Business Opportunity**” means a commercial arrangement in which:
1. A seller solicits a prospective purchaser to enter into a new business;
 2. The prospective purchaser makes a required payment; and
 3. The seller, expressly or by implication, orally or in writing, represents that the seller or one or more designated persons will:
 - i. Provide locations for the use or operation of equipment, displays, vending machines, or similar devices, owned, leased, controlled, or paid for by the purchaser;
 - ii. Provide outlets, accounts, or customers, including Internet outlets, accounts, or customers, for the purchaser’s goods or services; or
 - iii. Buy back any or all of the goods or services that the purchaser makes, produces, fabricates, grows, breeds, modifies, or provides, including providing payment for such services as, for example, stuffing envelopes from the purchaser’s home.

- B. **“Defendants”** means the Corporate Defendants and the Individual Defendants, individually, collectively, or in any combination.
1. **“Corporate Defendants”** means Click Profit, LLC, M23 Holdings, LLC, SA Automation Enterprise LLC, Click Profit Distribution, LLC, Automation Industries LLC, M7 Investments LLC, Express Ecom LLC, and Ecom Direct LLC, and each of their subsidiaries, affiliates, successors, and assigns.
 2. **“Individual Defendants”** means Craig Emslie, Patrick McGeoghean, Jason Masri, and William Holton.
- C. **“Earnings Claim(s)”** means any oral, written, or visual representation to a consumer that conveys, expressly or by implication, a specific level or range of actual or potential sales, or gross or net income or profits. Earnings Claims include: (1) any chart, table, or mathematical calculation that demonstrates possible results based upon a combination of variables; and (2) any statements from which a consumer can reasonably infer that he or she will earn a minimum level of income.
- D. **“Receiver”** means Maria Yip, the receiver appointed in Section XI of the Preliminary Injunctions entered as to each Defendant [ECF Nos. 81, 83, 85], and any deputy receivers that shall be named by the receiver.
- E. **“Receivership Entities”** means Corporate Defendants as well as any other entity that has conducted any business related to the marketing and sale of Defendants’ online services, including receipt of assets derived from any activity that is the subject of the Complaint in this matter, and that the Receiver determines is controlled or owned by any Defendant.
- F. **“Receivership Estate”** means the assets identified in Section IV.C-D of this Order and all assets of the Receivership Entities, including: (a) any assets of the Receivership

Entities currently in the possession of the Receiver; (b) all the funds, property, premises, accounts, documents, mail, and all other assets of, or in the possession or under the control of the Receivership Entities, wherever situated, the income and profits therefrom, all sums of money now or hereafter due or owing to the Receivership Entities, and any other assets or property belonging or owed to the Receivership Entities; (c) any assets of the Receivership Entities held in asset protection trusts; (d) any reserve funds or other accounts associated with any payments processed on behalf of any Receivership Entities, including such reserve funds held by a payment processor, credit card processor, or bank; and (e) all proceeds from the sale of such assets, except those assets the sale of which the Receiver determines will not add appreciably to the value of the estate.

- G. **“Stipulating Defendants”** means Stipulating Corporate Defendant and Stipulating Individual Defendant.
- H. **“Stipulating Corporate Defendant”** means Ecom Direct LLC and each of its subsidiaries, affiliates, successors, and assigns.
- I. **“Stipulating Individual Defendant”** means William Holton.

ORDER

I. BAN ON BUSINESS OPPORTUNITIES

IT IS ORDERED that Stipulating Defendants are permanently restrained and enjoined from advertising, marketing, promoting, distributing, or offering for sale, or assisting others in the advertising, marketing, promoting, distributing, or offering for sale of, any Business Opportunity.

II. PROHIBITED BUSINESS ACTIVITIES

IT IS FURTHER ORDERED that Stipulating Defendants and their 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, or offering for sale of any good or service, are permanently restrained and enjoined from:

A. Making any Earnings Claims, or assisting others in making any Earnings Claims, unless the Earnings Claim is non-misleading and Stipulating Defendants (1) at the time the Earnings Claims is made, (a) have a reasonable basis for the claim; and (b) have in their possession written materials that substantiate the Earnings Claims and that the Earnings Claims are typical for consumers similarly situated to those to whom the claim is made; and (2) make the written substantiation for Earnings Claims available upon request to a consumer or the FTC;

B. Misrepresenting or assisting others in misrepresenting, expressly or by implication, that:

1. Stipulating Defendants are affiliated with, or endorsed or sponsored by, any business; or
2. Any automated, algorithmic, artificial intelligence, or machine learning process is used for any purpose.

C. Misrepresenting or assisting others in misrepresenting, expressly or by implication, any other fact material to consumers concerning any good or service, such as: the total costs; the amount of time necessary to achieve any represented results; any material restrictions, limitations, or conditions; or any material aspect of its performance, efficacy, nature, or central characteristics.

III. PROHIBITED CONSUMER REVIEW PRACTICES

IT IS FURTHER ORDERED that Stipulating Defendants and their 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, or offering for sale of any good or service, are permanently restrained and enjoined from:

A. Prohibiting, restricting, or discouraging consumers from speaking or publishing truthful and non-defamatory comments about Stipulating Defendants and their goods or services; or imposing a penalty or fee against any consumer who engages in such communications; or

B. Offering form contracts containing provisions that prohibit or restrict the ability of an individual who is party to the form contract from engaging in written, oral, or pictorial review, performance assessment of, or other similar analysis of, including by electronic means, the goods, services or conduct of Stipulating Defendants.

IV. MONETARY JUDGMENT AND PARTIAL SUSPENSION

IT IS FURTHER ORDERED that:

A. Judgment in the amount of Thirteen Million, Six Hundred Twenty-Five Thousand, Seven Hundred Eighty Three Dollars (\$13,625,783) is entered in favor of the FTC against Stipulating Defendants as monetary relief. Stipulating Defendants' liability for the judgment shall be joint and several with one another and with any other Defendants to the extent separately ordered in the final order against Defendants Click Profit, LLC, M23 Holdings, LLC, SA Automation Enterprise LLC, M7 Investments LLC, Express Ecom LLC, Craig Emslie, and Patrick McGeoghean ("the Emslie and McGeoghean Defendants") and in the final order against Defendants Jason Masri, Automation Industries LLC, and Click Profit Distribution, LLC ("the Masri Defendants").

B. Stipulating Individual Defendant William Holton is ordered to pay to the Commission \$15,000, which, as Stipulating Defendants stipulate, his 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.

C. Immediately upon entry of this Order, Stipulating Defendants are ordered to surrender to the Receiver all control, title, dominion, and interest each has to the following assets:

- i. All interest the Stipulating Defendants have in funds in any accounts in the name of the Receivership Entities;
- ii. All cash held by the Receiver;
- iii. All assets owned by the Receivership Entities, including any real, personal, or intellectual property, chattel, goods, instruments, equipment, fixtures, general intangibles, effects, leaseholds, contracts, mail, or other deliveries, shares or stock, securities, inventory, checks, notes, accounts, credits, receivables, insurance policies, lines of credit, cash, trusts (including asset protection trusts), lists of consumer names and reserve funds or any other accounts associated with any payments processed by, or on behalf of the Receivership Entities.

D. Within 7 days after the entry of this Order, the Stipulating Defendants are ordered to transfer to the Receiver for sale the vehicle below. Immediately upon transfer, the Receiver shall assume the obligations under the subject loan, which include paying for any subsequent loan payments and selling the vehicle. The Stipulating Defendants shall cooperate with the Receiver to effectuate any sale, transfer, loan payoff, or assumption of loan.

- i. The 2020 Ford F-150 with Vehicle Identification Number 1FTEW1E40LFC56176.

E. Upon completion of the payment and all other asset transfers identified in Subsections B-D, the remainder of the judgment against Stipulating Defendants is suspended, subject to the Subsections below.

F. The FTC's agreement to the suspension of part of the judgment against Stipulating Defendants is expressly premised upon the truthfulness, accuracy, and completeness of Stipulating Defendants' sworn financial statements and related documents (collectively "financial attestations") submitted to the FTC, namely:

- i. Financial Statement of Stipulating Individual Defendant William Holton, dated March 17, 2025, including all attachments;
- ii. The revised Financial Statement of Stipulating Individual Defendant William Holton, dated March 27, 2025, including all attachments;
- iii. Financial Statement of Stipulating Corporate Defendant Ecom Direct LLC, dated March 17, 2025, including all attachments;
- iv. The additional information and documentation submitted by email from Stipulating Defendants' counsel to FTC counsel dated May 28, 2025, and attaching additional financial records;
- v. The additional information and documentation submitted by email from Stipulating Defendants' counsel to FTC counsel dated June 10, 2025, and attaching additional financial records;
- vi. The additional information and documentation submitted by email from Stipulating Defendants' counsel to FTC counsel dated June 19, 2025 and attaching additional financial records.

G. The suspension of the judgment will be lifted as to any Stipulating Defendant if, upon motion by the FTC, the Court finds that the Stipulating 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 attestations identified above.

H. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Stipulating 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.

I. Stipulating 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.

J. 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 FTC, 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.

K. The facts alleged in the Complaint establish all elements necessary to sustain an action by the FTC 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.

L. Each Stipulating Defendant acknowledges that the Stipulating Defendant's Employer Identification Number, Social Security Number, or other Taxpayer Identification Number ("TIN"), including all TINs that Stipulating Defendants previously provided, may be used by the FTC 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.

M. All money received by the FTC pursuant to this Order may be deposited into a fund administered by the FTC 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 FTC decides that direct redress to consumers is wholly or partially impracticable or money remains after such redress is completed, the FTC 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. Stipulating Defendants have no right to challenge any actions the FTC or its representatives may take pursuant to this Subsection.

N. The freeze of Stipulating Defendants' assets imposed under Section III of the Stipulated Preliminary Injunction dated April 18, 2025, and entered on April 21, 2025 [ECF No. 81], is modified to permit the payment and transfers identified in the section titled Monetary Judgment and Partial Suspension. Upon completion of such payments and transfers, the asset freeze imposed under the Preliminary Injunction is dissolved as to Stipulating Defendants.

O. Stipulating Defendants must fully cooperate with the FTC and the Receiver as to the asset freeze and receivership. Stipulating Defendants must take all steps reasonably necessary to assist in the transfer of each asset identified in the section titled Monetary Judgment and Partial Suspension. If requested to execute appropriate documents, such as to liquidate, transfer, or assign any frozen asset, Stipulating Defendants must execute such documents within 3 days of a written request from a representative of the Commission or the Receiver.

V. CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Stipulating Defendants, and their agents, officers, employees, and attorneys, and all other persons in active concert or participation with them are permanently restrained and enjoined from directly or indirectly:

A. Failing to provide sufficient customer information to enable the FTC to efficiently administer consumer redress. Stipulating Defendants represent that they have provided this redress information to the FTC. If a representative of the FTC requests in writing any information related to redress, Stipulating Defendants must provide it, in the form prescribed by the FTC, within 14 days;

B. Disclosing, using, or benefitting 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 prior to entry of this Order in connection with the marketing or sale of any good or service; and

C. Failing to 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 FTC.

Provided, however, that customer information need not be disposed of, and may be disclosed, to the extent requested by a government agency or required by law, regulation, or court order.

VI. COOPERATION

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

VII. RECEIVERSHIP

IT IS FURTHER ORDERED that the appointment and authority of the Receiver pursuant to the Preliminary Injunctions [ECF Nos. 81, 83, 85] are hereby continued in full force and effect until the termination of the Receivership pursuant to Section VIII. The Receiver shall also take the necessary steps to wind down the businesses of the Stipulating Corporate Defendant, liquidate assets,

and pay any net proceeds to the Commission to satisfy the monetary judgment in this Order. In carrying out these duties, the Receiver shall be the agent of this Court, shall be accountable directly to this Court, and is also authorized and directed to:

A. Take any and all steps that the Receiver concludes are appropriate to wind down the affairs of the Stipulating Corporate Defendant.

B. Continue to exercise full control over the Stipulating Corporate Defendant and continue to collect, marshal, and take custody, control, and possession of all the funds, property, premises, accounts, documents, mail, and other assets of, or in the possession or under the control of the Stipulating Corporate Defendant, wherever situated, the income and profits therefrom, and all sums of money now or hereafter due or owing to the Stipulating Corporate Defendants.

C. Continue to have full control over the management and personnel of the Stipulating Corporate Defendant.

D. Take all steps necessary or advisable, including issuing subpoenas, to locate and liquidate all other assets of the Stipulating Corporate Defendants, cancel the Receivership Entities' contracts, collect on amounts owed to the Stipulating Corporate Defendant, and take such other steps as may be necessary to wind-down the Stipulating Corporate Defendant efficiently.

E. To the extent not already completed, the Receiver shall as soon as practicable after the entry of this Order, take exclusive custody, control, and possession of all assets identified in Section IV.C-D of this Order.

F. Sell the nonliquidated assets of the Stipulating Corporate Defendant using commercially reasonable procedure without further order of the Court.

G. The Receiver shall give reasonable notice to the Commission of any settlements or compromises by the Receiver concerning the Receivership Estate, before the settlement or

compromise is consummated. Within 20 days of this notice, the FTC shall have the opportunity to object to any such settlement, by filing a motion with the Court.

H. Make payments and disbursements from the Receivership Estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order. The Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Stipulating Corporate Defendant prior to the date of entry of the temporary restraining order in this action, except payments that the Receiver deems necessary or advisable to ensure assets of the Stipulating Corporate Defendant are not lost, stolen, or dissipated.

I. Institute actions or proceedings in state, federal, or foreign courts as the Receiver deems necessary and advisable to preserve or recover the assets of the Stipulating Corporate Defendant, or that the Receiver deems necessary and advisable to carry out the Receiver's mandate under this Order, including actions challenging fraudulent or voidable transfers.

J. Defend any or all actions or proceedings instituted against the Stipulating Corporate Defendant, as the Receiver deems necessary and advisable to preserve the assets of the Stipulating Corporate Defendant.

K. Continue to maintain accurate records of all receipts and expenditures incurred as the Receiver.

L. Perform all acts necessary or advisable to complete an accurate accounting of assets of the Receivership Estate, and prevent unauthorized transfer, withdrawal, or misapplication of said assets.

M. Continue to be entitled to reasonable compensation for the performance of the Receiver's duties pursuant to this Order, including duties performed by the Receiver's agents, including accountants and lawyers, and for the cost of actual out-of-pocket expenses incurred by them, from the assets of the Receivership Estate, at the hourly rate previously agreed to by the Receiver.

VIII. RECEIVERSHIP TERMINATION

IT IS FURTHER ORDERED that the Receiver must complete all duties within 120 days after entry of this Order, but any party or the Receiver may request that the Court extend that Receiver's term for good cause. The Receiver shall also:

A. Prepare and submit a report describing the Receiver's activities pursuant to this Order, and a final application for compensation and expenses; and

B. Distribute to the Commission all remaining liquid assets at the conclusion of the Receiver's duties, in partial satisfaction of the monetary judgment set forth in this Order. Any and all uncollected judgments obtained for the benefit of the Receivership Entities shall be assigned to the FTC for further collection efforts.

Upon completion of the above tasks, the duties of the Receiver shall terminate, and the Receiver shall be discharged.

IX. ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that Stipulating Defendants obtain acknowledgments of receipt of this Order:

A. Each Stipulating Defendant, within 7 days of entry of this Order, must submit to the FTC an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For 10 years after entry of this Order, Stipulating 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 Stipulating 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 Stipulating Defendants delivered a copy of this Order, Stipulating Defendants must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

X. COMPLIANCE REPORTING

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

A. One year after entry of this Order, each Stipulating Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Stipulating 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 that Stipulating Defendant; (b) identify all of that Stipulating 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 Stipulating Individual Defendant must describe if they know or should know due to their own involvement); (d) describe in detail whether and how that Stipulating 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, Stipulating 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 10 years after entry of this Order, each Stipulating Defendant must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:

1. Each Stipulating 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, Stipulating 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 Stipulating Defendant must submit to the FTC notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against any such Stipulating Defendant within 14 days of its filing.

D. Any submission to the FTC 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 FTC representative in writing, all submissions to the FTC 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. Click Profit, LLC et al.*, No. 1:25-cv-20973 (S.D. Fla.) (FTC No. X250026).

XI. RECORD KEEPING

IT IS FURTHER ORDERED that Stipulating Defendants must create certain records for 10 years after entry of the Order, and retain each such records for 5 years. Specifically, Stipulating Corporate Defendant and Stipulating 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 FTC; and
- E. a copy of each unique advertisement or other marketing material.

XII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Stipulating Defendants' compliance with this Order, including the financial attestations upon which the judgment was suspended 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 FTC, each Stipulating 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 FTC 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 FTC is authorized to communicate directly with each Stipulating Defendant. Stipulating Defendants must permit representatives of the FTC to interview any employee or other person affiliated with any Stipulating Defendant who has agreed to such an interview. The person interviewed may have counsel present.


C. The FTC may use all other lawful means, including posing, through its representatives as consumers, suppliers, or other individuals or entities, to Stipulating Defendants or any individual or entity affiliated with them, without the necessity of identification or prior notice. Nothing in this Order limits the FTC'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 FTC, any consumer reporting agency must furnish consumer reports concerning Stipulating Individual Defendant, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

XIII. 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.

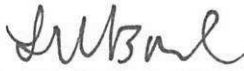
DONE AND ORDERED in the Southern District of Florida on August 25, 2025.



DAVID S. LEIBOWITZ
UNITED STATES DISTRICT JUDGE

cc: counsel of record

**SO STIPULATED AND AGREED:
FOR PLAINTIFF:
FEDERAL TRADE COMMISSION**



Lisa Bohl
Federal Trade Commission
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Chicago, IL 60604
(312) 960-5602; lbohl1@ftc.gov

Date: 08/22/2025

FOR DEFENDANT WILLIAM HOLTON:


William Holton

Date: 6/20/25

FOR DEFENDANT ECOM DIRECT LLC:


William Holton

Date: 6/20/25