

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**GLOBAL CIRCULATION, INC., et
al.,**

Defendants.

Civil Action No. 1:24-cv-04927-TRJ

**STIPULATED MOTION TO
ENTER INTO ORDER FOR
PERMANENT INJUNCTION AND
MONETARY JUDGMENT**

Plaintiff, the Federal Trade Commission (“FTC”), filed its Complaint for Permanent Injunction and Other Relief on October 29, 2024 (ECF No. 1), subsequently amended on April 30, 2025 as First Amended Complaint for Permanent Injunction and Other Relief (ECF No. 33) (“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) and 57b, Section 5581(b)(5)(C)(ii) of the Consumer Financial Protection Act, 12 U.S.C. § 5581(b)(5)(C)(ii), and Section 522(a) of the Gramm-Leach-Bliley Act (“GLB Act”), 15 U.S.C. § 6822(a). On October 29, 2024, on motion by the FTC, the Court entered an *ex parte* temporary restraining order with asset freeze, appointment of a receiver, and other equitable relief against Defendants (“TRO”) (ECF No. 7.). On November 26, 2024, the Court entered a Preliminary Injunction against Defendants. (ECF No. 24.)

Now, the FTC, Defendants, and the Court-appointed Receiver, by and through their undersigned counsel, have stipulated and agreed to the entry of a Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action between them. A proposed order has been filed herewith.

FINDINGS OF FACT

By stipulation of the parties, the Court finds as follows:

- A. This Court has jurisdiction over this matter.
- B. The Complaint charges that Defendants participated in deceptive and unlawful acts or practices that violate (1) Section 5(a) of the FTC Act, 15 U.S.C. § 45(a); (2) multiple provisions of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. §§ 1692–1692p, and its associated Regulation F, 12 C.F.R. Part 1006; (3) Section 521 of the Gramm-Leach-Bliley Act (“GLB Act”), 15 U.S.C. § 6821, and (4) Section 461.3(b) of the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses (“Impersonation Rule”), 16 C.F.R. Part 461.3(b), in connection with Defendants’ collection and attempted collection of purported debts.
- C. 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.

- D. 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.
- E. Defendants and the FTC waive all rights to appeal or otherwise challenge or contest the validity of this Order.
- F. Entry of this Order is in the public interest.

DEFINITIONS

For purposes of this Order, the following definitions shall apply:

- A. “**Consumer**” means any Person.
- B. “**Corporate Defendant**” means Global Circulation, Inc. and its subsidiaries, affiliates, successors, and assigns.
- C. “**Debt**” means any obligation or alleged obligation to pay money arising out of a transaction, whether or not such obligation has been reduced to judgment.
- D. “**Debt Collection Activity**” means any activity of a Debt Collector to collect or attempt to collect, directly or indirectly, a Debt owed or due, or asserted to be owed or due.
- E. “**Debt Collector**” means any Person who uses any instrumentality of interstate commerce or the mail in any business the principal purpose of which is the collection of Debts, or who regularly collects or attempts to collect, directly or indirectly, Debts owed or due, or asserted to be owed or due, to another. The

term also includes any creditor who, in the process of collecting its own Debts, uses any name other than its own which would indicate that a third Person is collecting or attempting to collect such Debts. The term also includes any Person to the extent such Person collects or attempts to collect any Debt that was in default at the time it was obtained by such Person.

- F. “**Defendants**” means Corporate Defendant and Individual Defendant.
- G. “**Individual Defendant**” means Kenneth Redon III and any other names by which he is known.
- H. “**Person**” means a natural person, an organization or other legal entity, including a corporation, partnership, sole proprietorship, limited liability company, association, cooperative, or any other group or combination acting as an entity.
- I. “**Receiver**” means Michael Fuqua.
- J. “**Receivership Entities**” means Corporate Defendant as well as any other entity that has conducted any business related to Defendants’ Debt Collection Activities or related business activities, 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 either Defendant, including but not limited to, Total Consumer Solutions LLC, Redon Consulting Services, Inc., Redon Consulting Services, LLC, Impact Credit Now LLC, Pro Asset

Processing LLC, Pro Asset Solutions LLC, Global Forex Mastery Inc., Talk N Business LLC, OPM Music Group LLC, Trap Stars, Inc., and Wholesale Minks LLC.

ORDER

BAN ON DEBT COLLECTION AND DEBT BROKERING ACTIVITIES

- I. IT IS THEREFORE ORDERED** that Defendants, whether acting directly or through any other Person, are permanently restrained and enjoined from:
- A. Participating in Debt Collection Activities; and
 - B. Advertising, marketing, promoting, offering for sale, selling, or buying any Consumer or commercial Debt or any information regarding a Consumer relating to a Debt.

PROHIBITION AGAINST MISREPRESENTATIONS

- II. IT IS FURTHER ORDERED** that that Defendants, Defendants' officers, agents, employees, and attorneys, and all other persons in active concert or participation with them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or indirectly, in connection with the advertising, marketing, promoting, or offering for sale of any goods or services, are permanently restrained and enjoined from misrepresenting or assisting others in misrepresenting, directly or indirectly, expressly or by implication:

- A. That any Person has a legal obligation to pay Defendants or any other Person;
- B. That any Person is an attorney or mediator or affiliated or associated with an attorney, law firm, mediator, or mediation firm;
- C. The nature or terms of any refund, cancellation, exchange, or repurchase policy, including, but not limited to, the likelihood of a Consumer obtaining a full or partial refund, or the circumstances in which a full or partial refund will be provided to the Consumer; and
- D. Any fact material to Consumers concerning any good or service, such as the total cost to purchase, receive, or use such good or service; any material restrictions, limitations, or conditions to purchase, receive, or use such good or service; or any material aspect of the performance, efficacy, nature, or central characteristic of such product or service.

INJUNCTION RELATING TO CONSUMER FINANCIAL INFORMATION

III. 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, are hereby permanently restrained and enjoined from:

- A. Making any false, fictitious, or fraudulent statement or representation to any Person to obtain or attempt to obtain information of a Consumer, including, but not limited to, credit or debit card numbers, bank account numbers and routing numbers, and consumer credit reports; and
- B. Violating the Gramm-Leach-Bliley Act, 15 U.S.C. §§ 6801-6809, §§ 6821-6827, a copy of which is attached as Attachment A.

INJUNCTION RELATING TO IMPERSONATING ANY BUSINESS OR PERSON

IV. 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, are hereby permanently restrained and enjoined from:

- A. Misrepresenting or assisting others in misrepresenting, expressly or by implication, that any Person is affiliated with, endorsed, sponsored by, or approved by, or otherwise connected to any other Person or business; and
- B. Violating the FTC's Impersonation Rule, 16 C.F.R. Part 461, a copy of which is attached as Attachment B.

CONTINUATION OF RECEIVERSHIP

V. **IT IS FURTHER ORDERED** that Michael Fuqua shall continue as a permanent receiver over the Receivership Entities with full powers of a permanent receiver, including but not limited to those powers set forth in the Stipulated Preliminary Injunction entered on November 26, 2024 (ECF No. 24), and including full liquidation powers. The Receiver is directed to wind up the Receivership Entities and liquidate all assets within 365 days after entry of this Order. Any party or the Receiver may request that the Court extend the Receiver's term for good cause. Upon termination of the receivership and final payment to the Receiver of all approved fees, costs, and expenses, the Receiver shall turn over to the FTC or its designated agent all remaining assets in the receivership estate.

MONETARY JUDGMENT AND PARTIAL SUSPENSION

VI. **IT IS FURTHER ORDERED** that:

- A. Judgment in the amount of NINE MILLION, SIX HUNDRED AND EIGHTY-FOUR THOUSAND, THREE HUNDRED, AND THIRTY-EIGHT Dollars (\$9,684,338) is entered in favor of the FTC against Defendants, jointly and severally, as monetary relief pursuant to Section 19 of the FTC Act, 15 U.S.C. § 57b, for Defendants' violations of the FDCA, Regulation F, Section 521(a) of the GLB Act, and the Impersonation Rule.

B. In partial satisfaction of the judgment set forth in Section VI.A:

1. All financial or other institutions holding accounts in the name of, on behalf of, or for the benefit of, any Receivership Entity shall, within ten (10) business days of receipt of a copy of this Order, transfer to the Receiver or his designated agent all funds, if any, in such accounts, including, but not limited to:
 - a. Wells Fargo Bank shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in (a) account number xxxx3445 in the name of Global Circulation; and (b) account number xxxx6082 in the name of Global Circulation;
 - b. JP Morgan Chase Bank shall, within 10 business days of receipt of a copy of this order, transfer to the Receiver all funds, if any, in (a) account number xxxx0837 in the name of Trap Stars; and (b) account number xxxx8167 in the name of Wholesale Minks;
 - c. Bank of America shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in account number xxxx8330 in the name of Global Circulation;
 - d. Navy Federal Credit Union shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in (a)

- account number xxxx6855 in the name of Global Circulation; and (b) account number xxxx4015 in the name of Global Circulation;
- e. Signature Federal Credit Union, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in account number xxxx3158 in the name of Global Circulation;
- f. PayArc shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in or associated with account number xxxx3475 in the name of Global Circulation;
- g. Maverick shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in or associated with account number xxxx3067 in the name of Global Circulation; and
- h. Bluevine shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in or associated with account number xxxx0772 in the name of Global Circulation.
2. Wells Fargo Bank shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in (a) account number xxxx3075 in the name of Kenneth Redon; and (b) account number xxxx3858 in the name of Kenneth Redon. Upon such transfer, the funds shall be an asset of the receivership estate, to be governed by Section V of this Order;

3. JP Morgan Chase Bank shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in account number xxxx3737 in the name of Kenneth Redon. Upon such transfer, the funds shall be an asset of the receivership estate, to be governed by Section V of this Order;
4. Navy Federal Credit Union shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in (a) account number xxxx4113 in the name of Kenneth Redon; and (b) account number xxxx6300 in the name of Kenneth Redon. Upon such transfer, the funds shall be an asset of the receivership estate, to be governed by Section V of this Order;
5. Signature Federal Credit Union shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in account number xxxx5157 in the name of Kenneth Redon. Upon such transfer, the funds shall be an asset of the receivership estate, to be governed by Section V of this Order;
6. Capital One Bank shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in (a) account number xxxx9719 in the name of Kenneth Redon; and (b) account number xxxx6329 in the name of Kenneth Redon. Upon such transfer,

the funds shall be an asset of the receivership estate, to be governed by Section V of this Order;

7. Robinhood Securities shall, within 10 business days of receipt of a copy of this Order, liquidate, and transfer the proceeds of such liquidation to the Receiver, all assets including all cryptocurrency in account number xxxx1973 in the name of Kenneth Redon or otherwise held in the name of Kenneth Redon. Upon such transfer, the proceeds shall be an asset of the receivership estate, to be governed by Section V of this Order;
8. Kot4X shall, within 10 business days of receipt of a copy of this Order, liquidate, and transfer the proceeds of such liquidation to the Receiver, all assets including all cryptocurrency in account number xxxx7151 in the name of Kenneth Redon or otherwise held in the name of Kenneth Redon. Upon such transfer, the proceeds shall be an asset of the receivership estate, to be governed by Section V of this Order;
9. Block shall, within 10 business days of receipt of a copy of this Order, transfer to the Receiver all funds, if any, in the name of Kenneth Redon. Upon such transfer, the funds shall be an asset of the receivership estate, to be governed by Section V of this Order;
10. Defendant Redon shall, within thirty (30) days after the date of entry of this Order, either (a) transfer to the Receiver cash in the amount of

\$10,000 or (b) transfer to the Receiver the 2023 Toyota Corolla identified on his financial statement, in which case Defendant Redon shall cooperate fully with the Receiver and shall execute any instrument or document presented by the Receiver, and do whatever else the Receiver deems necessary or desirable to effect such transfer. Upon such transfer, the vehicle shall be an asset of the receivership estate, to be governed by Section V of this Order, provided that Defendant Redon shall have the right of first offer on any sale of such vehicle;

11. Defendant Redon shall, within thirty (30) days after the date of entry of this Order, either (a) transfer to the Receiver cash in the amount of \$17,500 or (b) transfer to the Receiver the diamond chain identified on his financial statement. Upon such transfer, the jewelry shall be an asset of the receivership estate, to be governed by Section V of this Order, provided that Defendant Redon shall have the right of first offer on any sale of such jewelry;

C. Upon completion of the asset transfers set forth in Sections VI.B of this Order, the remainder of the judgment is suspended, subject to Subsections E, F, and G below.

- D. The asset freeze is modified to permit the transfers and liquidations identified in this Section. Upon completion of those transfers and liquidations, the asset freeze as to Defendants is dissolved.
- E. The FTC'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 FTC, namely: (1) the Financial Statement of Individual Defendant Kenneth Redon signed on November 11, 2024, including the attachments and including the email from Defendants' counsel dated January 24, 2025, and (2) the Financial Statement of Corporate Defendant Global Circulation signed by Kenneth Redon on November 11, 2024, including the attachments.
- F. The suspension of the judgment will be lifted as to a Defendant if, upon motion by the FTC, the Court finds that such 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.
- G. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Defendant in the amount specified in Subsection VI.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.

- H. 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.
- I. 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 Section VI.A of this Order, such as a nondischargeability complaint in any bankruptcy case.
- J. 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.
- K. Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Number or Employer Identification Number), which Defendants previously submitted to the FTC, may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

L. 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 such relief is to be deposited to the U.S. Treasury. Defendants have no right to challenge any actions the FTC or its representatives may take pursuant to this Subsection.

CUSTOMER INFORMATION

VII. 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 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. If a representative of the FTC requests in writing any information related to redress, 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 Defendants obtained prior to entry of this Order in connection with the collection or attempted collection of purported Debts; 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.
- D. 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.

ORDER ACKNOWLEDGMENTS

VIII. 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 FTC an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. For 5 years after entry of this Order, 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 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 specified in Sections I–IV and all agents and representatives who participate in conduct specified in Sections I–IV; 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, such Defendant must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

COMPLIANCE REPORTING

IX. IT IS FURTHER ORDERED that each Defendant make timely submissions to the FTC:

- 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 FTC may use to communicate with such

- Defendant; (b) identify all of such 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 the other Defendant (which Individual Defendant must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how such 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 FTC.
2. Additionally, 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 Individual Defendant performs services whether as an employee or otherwise and any entity in which Individual Defendant has any ownership interest; and (c) describe in detail Individual 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 Corporate Defendant or any entity that such 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, 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 Individual Defendant performs services whether as an employee or otherwise and any entity in which Individual 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 FTC 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 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. Global Circulation, Inc., Matter No. X250008.

RECORDKEEPING

X. IT IS FURTHER ORDERED that each Defendant must create certain records for 20 years after entry of the Order, and retain each such record for 5 years. Specifically, Corporate Defendant and Individual Defendant, for any business that Individual Defendant, individually or collectively with Corporate Defendant, 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.

COMPLIANCE MONITORING

XI. IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with this Order, including the financial representations upon which part of 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 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 Defendants. Defendants must permit representatives of the FTC to interview any employee or other person affiliated with Defendants 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 Defendants or any individual or entity affiliated with Defendants, 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 Individual Defendant, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

RETENTION OF JURISDICTION

XII. IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO STIPULATED AGREED.

Dated: February 11, 2025

Respectfully submitted,



GLOBAL CIRCULATION, INC.,
Defendant
By: Kenneth Redon, authorized
signatory



KENNETH REDON, Defendant



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 30, 2025, the foregoing **STIPULATED MOTION TO ENTER INTO ORDER FOR PERMANENT INJUNCTION AND MONETARY** and **[proposed] STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY** were filed via CM/ECF, which will automatically serve such filing to all parties of record registered with the court's electronic filing system.

/s/Gregory A. Ashe
Attorney for Plaintiff Federal Trade Commission