

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

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

FRANK ROMERO, individually and also
d/b/a Trend Deploy, Trendemploy, trendemploy,
trendemploy.com, Frank Romero Advertising,
and Uvenux,

Defendant,

CASE NO. 5:21-cv-343

**JOINT MOTION FOR ENTRY OF STIPULATED ORDER PARTIALLY
MODIFYING THE COURT’S ORDERS AT DOCKET ENTRIES 63 AND 104**

The Federal Trade Commission (“FTC” or “Commission”) and Defendant Frank Romero (“Romero”) jointly move the Court to enter a stipulated order partially modifying the Court’s orders at docket entries 63 and 104. The proposed order would resolve all outstanding matters in dispute between them in this action and the related fraudulent transfer action, Case No. 5:24-cv-00473.

LOCAL RULE 3.01(G) CERTIFICATION

The parties have conferred on this motion and jointly seek the relief sought herein.

Dated this 7th day of August, 2025.

Respectfully submitted,

/s/ Christopher J. Erickson

Christopher J. Erickson (cerickson@ftc.gov)

Brian M. Welke (bwelke@ftc.gov)

FEDERAL TRADE COMMISSION

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Attorneys for Plaintiff

FEDERAL TRADE COMMISSION

/s/ Frank Romero

Frank Romero

1827 NE 17th Street

Ocala, Florida 34470

CERTIFICATE OF SERVICE

I hereby certify that, on August 7, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I have also sent a copy of this filing to Frank Romero by email at adriel.romero2008@gmail.com and caused a copy of it to be sent by U.S. Mail to him at the following address:

Frank Romero
1827 NE 17th Street
Ocala, Florida 34470

I have also sent a copy of this filing to Patricia Martinez by email at angelesdelos133@gmail.com and caused a copy of it to be sent by U.S. Mail to her at the following address:

Patricia Martinez
1827 NE 17th Street
Ocala, Florida 34470

/s/ Christopher J. Erickson
Christopher J. Erickson