UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

FEDERAL TRADE COMMISSION, and STATE OF CONNECTICUT, Plaintiffs, v. CHASE NISSAN LLC, a limited liability company, also d/b/a MANCHESTER CITY NISSAN, and PATRICK DIBRE, individually and as an officer of CHASE NISSAN LLC, also d/b/a MANCHESTER CITY NISSAN, REFAAT SOBOH, aka BRIAN SOBOH, individually and as an officer of CHASE NISSAN LLC, also d/b/a MANCHESTER CITY NISSAN, MICHAEL HAMADI, AIHAM ALKHATIB, MATTHEW CHMIELINSKI, and FRED MOJICA, aka FREDDY MOJICA, Defendants.	Case No. 3:24-cv-00012-VDO **STIPULATED ORDER FOR PERMANENT INJUNCTION, MONETARY JUDGMENT, AND OTHER RELIEF**

Plaintiffs, the Federal Trade Commission ("Commission" or "FTC") and State of Connecticut ("State"), by William Tong, Connecticut Attorney General (together, "Plaintiffs") filed their Complaint for Permanent Injunction, Monetary Judgment, Civil Penalty Judgment, and Other Relief ("Complaint"), pursuant to Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b), and the Connecticut Unfair Trade Practices Act, Conn. Gen. Stat. § 42-110a *et seq.* ("CUTPA"). Plaintiffs and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief ("Order") to resolve and settle 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 of the FTC Act, 15 U.S.C. § 45, and Section 42-110a of CUTPA, Conn. Gen. Stat. § 42-110a *et seq.*, in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing, or financing of motor vehicles.

3. The Complaint charges that Defendants were at all times relevant to the Complaint engaged in trade and commerce in the State by advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles in and from the State.

4. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in the Order. Defendants enter into this Order to fully settle and resolve all of the claims asserted against them in the Complaint. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.

5. 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. The Plaintiffs waive any right to seek or request attorney fees and civil penalties against Defendants for the violations alleged in the Complaint through the date of this Order.

6. Defendants and Plaintiffs 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. "**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. 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.

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

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

8. When the representation or sales practice targets a specific audience, such as children, older adults, or the terminally ill, "reasonable consumers" includes reasonable members of that group.

D. "**Express, Informed Consent**" means an affirmative act communicating unambiguous assent to be charged, made after receiving, and in close proximity to, Clear and Conspicuous disclosure, orally and in writing, of the following:

1. the product or service associated with the charge;

2. all fees and costs to be charged to the consumer for the product or service; and

3. if the product or service is optional, that fact.

E. "**Defendants**" means all of the Individual and Corporate Defendants, individually, collectively, or in any combination.

1. "**Corporate Defendant**" means Chase Nissan LLC, also d/b/a Manchester City Nissan, and its successors and assigns.

2. "**Individual Defendants**" means Patrick Dibre, Refaat Soboh, aka Brian Soboh, Michael Hamadi, and Aiham Alkhatib.

F. **"Total Price"** means the maximum total price, including all mandatory fees or charges a consumer must pay for a motor vehicle, except that charges a Federal, State, or local government agency, unit, or department requires the consumer to pay may be excluded.

ORDER

I. PROHIBITION AGAINST MISREPRESENTATIONS

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, marketing, promoting, offering for sale, lease, or financing, or selling, leasing, or financing motor vehicles are permanently restrained and enjoined from misrepresenting, expressly or by implication:

A. the costs or terms of purchasing, financing, or leasing a vehicle;

B. the availability of vehicles at an advertised price;

C. whether vehicles are certified or include a limited manufacturer warranty;

D. whether charges, fees, taxes, products, or services are optional or required;

E. whether charges, products, or services are authorized by consumers;

F. the amount of any charge, fee, or tax;

G. any other fact material to consumers concerning any good or service, such as: any restrictions, limitations, or conditions; or any aspect of the benefits, performance, efficacy, nature, or central characteristics.

II. REQUIRED DISCLOSURES

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, marketing, promoting, offering for sale, lease, or financing, or selling, leasing, or financing motor vehicles, are permanently restrained and enjoined from representing, expressly or by implication, any information relating to any amount a consumer may pay to purchase, finance, or lease a motor vehicle without disclosing the Total Price, Clearly and Conspicuously, as the most prominently displayed item in any visual disclosure. Provided, however, that if Defendants charge a fee for processing documents (whether called a conveyance fee, document fee, or another term), Defendants shall, in addition to including the fee in the Total Price, for Connecticut-based dealerships and in any other state that has such a requirement, state the fee separately and adjacent to the Total Price.

Provided, further, that nothing in this provision shall prevent any party from moving to modify this Section II pursuant to Federal Rule of Civil Procedure 60(b), nor limit the parties' rights to contest such a motion.

III. OBTAINING EXPRESS, INFORMED CONSENT FOR ALL CHARGES

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, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles, are permanently restrained and enjoined from charging a consumer without having obtained the consumer's Express, Informed Consent.

IV. MONETARY JUDGMENT

IT IS FURTHER ORDERED that:

A. Judgment in the amount of Four Million Dollars ($4,000,000) is entered in favor of the State against Defendants, jointly and severally, as monetary relief.

B. Defendants are ordered to pay to the State $4,000,000, which, as Defendants stipulate, their undersigned counsel holds in escrow for no purpose other than payment to the

State. The first payment of $2,000,000.00 must be made within 7 days of entry of this Order by electronic fund transfer or other means in accordance with instructions provided by a representative of the State. The remaining balance of $2,000,000.00 shall be payable to the State in two equal payments of $1,000,000.00 in 5 months of entry of this Order and 10 months of entry of this Order.

C. All money received by the State pursuant to this Order shall be used for restitution, redress, remediation, payment for a claims administrator or to come into compliance with the law. The Attorney General shall have sole discretion as to the disposition of these funds consistent with this Subsection. Any unused funds shall be disbursed to the State's General Fund. Defendants have no right to challenge any actions the State or its representatives may take pursuant to this Subsection.

D. 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.

E. 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 Plaintiffs to enforce rights to any payment or monetary judgment pursuant to this Order or as a nondischargeability complaint in any bankruptcy case.

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

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

V. CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, employees, and all other persons in active concert or participation with any of them are permanently restrained and enjoined from directly or indirectly failing to provide sufficient customer information to enable the State to efficiently administer consumer redress. Defendants represent that they have provided this redress information to Plaintiffs. If a representative of the State requests in writing any information related to redress, Defendants must provide it, in the form prescribed by the State, within 14 days.

VI. 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 Plaintiffs 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 involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles that such Defendant, individually or collectively with any other Defendants, is the majority owner or controls directly or indirectly, and the Corporate Defendant, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, or representatives with managerial responsibilities for 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 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.

VII. COMPLIANCE REPORTING

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

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 Plaintiffs may use to communicate with Defendant; (b) identify all of that Defendant's businesses involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business identified in Subsection (b) above, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which Defendant 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 Acknowledgment obtained pursuant to this Order, unless previously submitted to Plaintiffs.

2. Additionally, each Individual Defendant must: (a) identify all telephone numbers and all physical, postal, and email addresses, including all residences; (b)

identify all business activities involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles, 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 6 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 the Corporate Defendant or any entity involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles 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 involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles, including any business for which such Defendant performs services whether as an employee or otherwise and any entity involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles 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 Plaintiffs 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 Plaintiffs 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 representative of Plaintiffs 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. All submissions to the State must be emailed to attorney.general@ct.gov or sent by overnight courier (not the U.S. Postal Service) to: Office of the Attorney General, Consumer Protection Section, 165 Capitol Avenue, Hartford, CT, 06106. The subject line must begin: FTC and State of Connecticut v. Chase Nissan LLC, X240018.

VIII. RECORDKEEPING

IT IS FURTHER ORDERED that Defendants must create certain records for 6 years after entry of the Order, and retain each such record for 5 years. Specifically, Corporate Defendant, for any business involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles, and each Individual Defendant for any business involved in the advertising, marketing, promoting, offering for sale, lease, or financing, or selling, leasing or financing motor vehicles 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 Plaintiffs;

E. a copy of each unique advertisement or other marketing material; and

F. a copy of any pencil, four square, or worksheet used to negotiate, desk, or pencil deals.

IX. 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 Plaintiffs, 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. Plaintiffs are 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, Plaintiffs are authorized to communicate directly with each Defendant. Defendant must permit representatives of the Plaintiffs to interview any employee or other person affiliated with Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. Plaintiffs 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 Plaintiffs, 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).

X. 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 19th **day of** August **, 202**6 **.**

/s/ Oliver, J.

THE HONORABLE VERNON D. OLIVER
UNITED STATES DISTRICT JUDGE

SO STIPULATED AND AGREED:

FOR PLAINTIFFS:

FEDERAL TRADE COMMISSION

/s/ Samuel Jacobson — Date: 8/14/26

Samuel Jacobson (phv207659)
Edward Smith (phv207656)
Paul Mezan (phv207738)
Daniel Hanks (phv208202)
Daniel Dwyer (phv208445)
Julia E. Heald (phv208446)
Federal Trade Commission
600 Pennsylvania Ave., NW
202-876-5590 (Jacobson)
202-326-3768 (fax)
sjacobson@ftc.gov
esmith2@ftc.gov
pmezan@ftc.gov
dhanks@ftc.gov
ddwyer@ftc.gov
jheald@ftc.gov

STATE OF CONNECTICUT

Allison Frisbee — Date: 8/14/26

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FOR DEFENDANTS CHASE NISSAN LLC, PATRICK DIBRE, REFAAT SOBOH, AND MICHAEL HAMADI:

Date: 7.15.26

Jonathan A. Kaplan (ct27126)
James T. Shearin (ct01326)
Meagan A. Cauda (ct31501)
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Telephone: 860-424-4379
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jtshearin@pullcom.com
mcauda@pullcom.com

FOR DEFENDANT AIHAM ALKHATIB:

Date: ____________________

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tmurphy@cmandh.com
jhealy@cmandh.com
awhite@cmandh.com

DEFENDANTS:

CHASE NISSAN LLC

Date: ____________________

PATRICK DIBRE, DULY AUTHORIZED
ON BEHALF OF OWNER SSS ROCKS, LLC

FOR DEFENDANTS CHASE NISSAN LLC, PATRICK DIBRE, REFAAT SOBOH, AND MICHAEL HAMADI:

________________________________ Date: _________________

Jonathan A. Kaplan (ct27126)
James T. Shearin (ct01326)
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FOR DEFENDANT AIHAM ALKHATIB:

________________________________ Date: 7/15/26

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awhite@cmandh.com

DEFENDANTS:

CHASE NISSAN LLC

________________________________ Date: _________________

PATRICK DIBRE, DULY AUTHORIZED
ON BEHALF OF OWNER SSS ROCKS, LLC

FOR DEFENDANTS CHASE NISSAN LLC, PATRICK DIBRE, REFAAT SOBOH, AND MICHAEL HAMADI:

______________________________ Date: ________________

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DEFENDANTS:

CHASE NISSAN LLC

______________________________ Date: 7/14/2026

PATRICK DIBRE, DULY AUTHORIZED
ON BEHALF OF OWNER SSS ROCKS, LLC

_______________________________ Date: ________________
REFAAT SOBOH, DULY AUTHORIZED
ON BEHALF OF OWNER REFAAT, LLC

_______________________________ Date: 7/14/2026
PATRICK DIBRE, INDIVIDUALLY

_______________________________ Date: ________________
REFAAT SOBOH, INDIVIDUALLY

_______________________________ Date: ________________
MICHAEL HAMADI, INDIVIDUALLY

_______________________________ Date: ________________
AIHAM ALKHATIB, INDIVIDUALLY

____
REFAAT SOBOH, DULY AUTHORIZED ON BEHALF OF OWNER REFAAT, LLC

Date: 07-13-2026

____
PATRICK DIBRE, INDIVIDUALLY

Date: ______________

____
REFAAT SOBOH, INDIVIDUALLY

Date: 07-13-2026

____
MICHAEL HAMADI, INDIVIDUALLY

Date: ______________

____
AIHAM ALKHATIB, INDIVIDUALLY

Date: ______________

______________________________ Date: ________________

REFAAT SOBOH, DULY AUTHORIZED
ON BEHALF OF OWNER REFAAT, LLC

______________________________ Date: ________________

PATRICK DIBRE, INDIVIDUALLY

______________________________ Date: ________________

REFAAT SOBOH, INDIVIDUALLY

______________________________ Date: 7-14-2026

MICHAEL HAMADI, INDIVIDUALLY

______________________________ Date: ________________

AIHAM ALKHATIB, INDIVIDUALLY

______________________________ Date: ______________

REFAAT SOBOH, DULY AUTHORIZED
ON BEHALF OF OWNER REFAAT, LLC

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REFAAT SOBOH, INDIVIDUALLY

______________________________ Date: ______________

MICHAEL HAMADI, INDIVIDUALLY

______________________________ Date: 07/15/2026

AIHAM ALKHATIB, INDIVIDUALLY