

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**FIRST AMERICAN PAYMENT SYSTEMS,  
LP**, a limited partnership, also d/b/a MERIMAC  
CAPITAL,

**ELIOT MANAGEMENT GROUP, LLC**, a  
limited liability company, also d/b/a SUNDANCE  
PAYMENT SOLUTIONS, and

**THINK POINT FINANCIAL, LLC**, a limited  
liability company, also d/b/a CYPRESS BAY  
SOLUTIONS and IMPULSE PAYMENTS,

Defendants.

Case No. \_\_\_\_\_

**JOINT MOTION TO ENTER STIPULATED  
ORDER FOR PERMANENT INJUNCTION,  
MONETARY JUDGMENT, AND OTHER RELIEF**

Plaintiff Federal Trade Commission (“Plaintiff”) and Defendants First American Payment Systems, LP, Eliot Management Group, LLC and Think Point Financial, LLC (“Defendants”) respectfully submit a proposed Stipulated Order For Permanent Injunction, Monetary Judgment, and Other Relief (“Stipulated Order”) attached hereto as Exhibit A, which has been signed by Plaintiff’s counsel and the Defendants. The Stipulated Order collectively resolves all matters in dispute between Plaintiff and Defendants in this action. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in the

Stipulated Order.

Plaintiff's counsel has presented the Stipulated Order to the full Federal Trade Commission, which has now approved it. Accordingly, Plaintiff and Defendants jointly move the Court to enter the Stipulated Order.

DATED this 29th day of July, 2022.

Respectfully submitted,

*/s/ Jason C. Moon*

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FEDERAL TRADE COMMISSION

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THINK POINT FINANCIAL, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on July 29th, 2022, a true and correct copy of the foregoing document was served through the CM/ECF system or electronic mail to the following parties or counsel:

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