

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

_____)
 FEDERAL TRADE COMMISSION,)
)
 Plaintiff,)
)
 v.)
)
 GOLDMAN SCHWARTZ INC, a corporation,)
 also d/b/a Goldman, Schwartz, Lieberman & Stein,)
)
 DEBTCOM, INC., a corporation, also d/b/a)
 Cole, Tanner, & Wright,)
)
 HARRIS COUNTY CHECK RECOVERY INC.,)
 a corporation,)
)
 THE G. WRIGHT GROUP INC., a corporation,)
 also d/b/a The Wright Group,)
)
 GERALD WRIGHT, a/k/a Barry Schwartz,)
)
 STARLETTE FOSTER, a/k/a Star Foster, and)
)
 JENNIFER ZAMORA,)
)
 Defendants.)
 _____)

Civil Action No. 4:13-cv-00106
Judge Gray H. Miller

**STIPULATED ORDER FOR PERMANENT INJUNCTION
AND MONETARY JUDGMENT**

Plaintiff, the Federal Trade Commission (Commission) filed its Complaint for Permanent Injunction and Other Equitable Relief (Complaint) in this matter, under Sections 13(b) and 19 of the Federal Trade Commission Act (FTC Act), 15 U.S.C. §§ 53(b) and 57b, and Section 814 of the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692l. The Commission and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction and Monetary Judgment (Order) by this Court to resolve 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 acts and practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and in deceptive, unfair, and abusive acts and practices in violation of the FDCPA, 15 U.S.C. § 1692-1692p, in connection with the collection of debts.
3. 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.
4. 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. Defendants waive and release any claims that they may have against the Commission, the Receiver, and their agents that relate to this action.
5. Defendants and the Commission waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

For purposes of this Order, the following definitions apply:

1. **“Corporate Defendants”** means Goldman Schwartz Inc, also d/b/a/ Goldman, Schwartz, Lieberman & Stein; Debtcom, Inc., also d/b/a/ Cole, Tanner, & Wright; Harris County Check Recovery Inc.; The G. Wright Group Inc., also d/b/a The Wright Group; and their successors and assigns.

2. **“Debt collection activities”** means any activities the principal purpose of which is to collect or attempt to collect, directly or indirectly, a debt owed or due, or asserted to be owed or due, another.

3. **“Defendants”** means all of the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination.

4. **“Financial-related product or service”** means any product or service represented, directly or by implication, to:

A. provide any consumer, arrange for any consumer to receive, or assist any consumer in receiving, credit, debit, or stored value cards;

B. improve, or arrange to improve, any consumer’s credit record, credit history, or credit rating;

C. provide advice or assistance to any consumer with regard to any activity or service the purpose of which is to improve a consumer’s credit record, credit history, or credit rating;

D. provide any consumer, arrange for any consumer to receive, or assist any consumer in receiving, a loan or other extension of credit; or

E. provide any consumer, arrange for any consumer to receive, or assist any consumer in receiving any service represented, expressly or by implication, to renegotiate, settle, or in any way alter the terms of payment or other terms of the debt between a consumer and one or more secured creditors, servicers, or debt collectors.

5. **“Individual Defendants”** means Gerald Wright, a/k/a Barry Schwartz; Starlette Foster, a/k/a Star Foster; and Jennifer Zamora.

6. **“Receiver”** means Charlene Koonce, of the law firm of Scheef & Stone, LLP, 500 N. Akard Street, Suite 2700, Dallas, Texas 75201.

7. **“Receivership Defendants”** means Goldman Schwartz Inc, also d/b/a/ Goldman, Schwartz, Lieberman & Stein; Debtcom, Inc., also d/b/a/ Cole, Tanner, & Wright; Harris County Check Recovery Inc.; The G. Wright Group Inc., also d/b/a The Wright Group, and IMG Capital Corporation.

ORDER

I. BAN ON DEBT COLLECTION ACTIVITIES

IT IS ORDERED that Defendants are permanently restrained and enjoined from engaging in any debt collection activities, whether directly or through an intermediary. Provided, however, that each Defendant may seek and receive payment for obligations incurred by persons who directly purchased goods or services from a business owned by that Defendant.

II. PROHIBITION AGAINST MISREPRESENTATIONS

IT IS FURTHER ORDERED that Defendants, Defendants’ officers, agents, servants, and employees, 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 promoting or offering for sale any financial-related product or service, are permanently restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication:

A. the terms or rates that are available for any loan or other extension of credit, including, but not limited to:

1. closing costs or other fees;

2. the payment schedule, the monthly payment amount(s), or other payment terms, or whether there is a balloon payment; interest rate(s), annual percentage rate(s), or finance charge(s); the loan amount, the amount of credit, the draw amount, or outstanding balance; the loan term, the draw period, or maturity; or any other term of credit;

3. the savings associated with the credit;

4. the amount of cash to be disbursed to the borrower out of the proceeds, or the amount of cash to be disbursed on behalf of the borrower to any third party;

5. whether the payment of the minimum amount specified each month covers both interest and principal, and whether the credit has or can result in negative amortization;

6. that the credit does not have a prepayment penalty or that no prepayment penalty and/or other fees or costs will be incurred if the consumer subsequently refinances; or

7. that the interest rate(s) or annual percentage rate(s) are fixed rather than adjustable or adjustable rather than fixed;

B. that a consumer will receive legal representation;

C. that any person is affiliated with, endorsed or approved by, or otherwise connected to any other person, government entity, or public, non-profit, or other non-commercial program, or any other program; or

D. any other fact material to consumers concerning a financial-related product or service.

III. MONETARY JUDGMENT AND PARTIAL SUSPENSION

IT IS FURTHER ORDERED that:

A. Judgment in the amount of ONE MILLION FOUR HUNDRED AND TWELVE THOUSAND EIGHT HUNDRED AND EIGHTY-EIGHT DOLLARS (\$1,412,888) is entered in favor of the Commission against Individual Defendants and Corporate Defendants, jointly and severally, as equitable monetary relief.

B. Corporate Defendants are ordered to, within 7 days of entry of this Order, take all necessary steps to transfer all Receivership Defendants' assets to the Receiver, including:

1. Transfer to the Receiver, by signing this Stipulated Order, all right, title, and interest, if any, in the contents of the receivership account at Amegy Bank N.A. (Central Receivership Account) described more fully in Attachment A to this Order. The Receiver is directed and authorized to distribute the remaining balance of the Central Receivership Account as provided for in the Section titled "Receivership Termination";

2. Execute the Deed, attached as Attachment B, transferring to the Receiver, or to her designated trust, all right, title, and interest that Corporate Defendants may have to the real property located at 2619 Hutchins, Houston, Texas (Hutchins Property), described more fully in Attachment A to this Order. The Receiver is directed and authorized to sell the Hutchins Property, subject to the provisions of 28 U.S.C. § 2001(b), and distribute the proceeds as provided for in the Section titled "Receivership Termination"; and

3. Transfer to the Receiver dominion, control, and legal and equitable title to the Purchased Debt Portfolios described more fully in Attachment C to this Order.

After the Corporate Defendants have made the payments and asset transfers required by this Subsection B., the remainder of the judgment against the Corporate Defendants is suspended, subject to the Subsections below.

C. Individual Defendant Wright is ordered to, within 7 days of entry of this Order:

1. Pay to the Receiver the full balance of the Member Source Credit Union account (Member Source Account) described more fully in Attachment A to this Order. Further, within 7 days of entry of this Order, Member Source Credit Union is ordered to transfer to the Receiver, solely from Individual Defendant Wright's account, the full balance of the Member Source Account. The proceeds of the Member Source Account shall be treated as an asset of the

Receivership for the purposes of this Order, and shall be distributed as provided for in the Section titled "Receivership Termination";

2. Pay to the Receiver the full balance of the TD Ameritrade account (Ameritrade Account) described more fully in Attachment A to this Order. Further, within 7 days of entry of this Order, TD Ameritrade is ordered to transfer to the Receiver, solely from Individual Defendant Wright's account, the full balance of the Ameritrade Account. The proceeds of the Ameritrade Account shall be treated as an asset of the Receivership for the purposes of this Order, and shall be distributed as provided for in the Section titled "Receivership Termination";

3. Pay to, endorse to, or take all necessary steps to transfer to the Receiver the full amount of the three Cashier's Checks now in the possession of the Receiver described more fully in Attachment A to this Order. The proceeds of the Cashier's Checks shall be treated as an asset of the Receivership for the purposes of this Order, and shall be distributed as provided for in the Section titled "Receivership Termination";

4. Execute the Quitclaim Deed, attached as Attachment D, transferring to the Receiver, or to her designated trust, all right, title, and interest that Individual Defendant Wright may have to the real property located at 5908 Bolivia Boulevard #4, Houston, Texas, described more fully in Attachment A to this Order. The Receiver is directed and authorized to sell this real property, subject to the provisions of 28 U.S.C. § 2001(b), and distribute the proceeds as provided for in the Section titled "Receivership Termination"; and

5. Transfer to the Receiver, or to her designated trust, all right, title, and interest that Individual Defendant Wright may have in: (1) the Central Receivership Account;

(2) the Hutchins Property; (3) the Purchased Debt Portfolios; and (4) any other assets of the Receivership Defendants.

After Individual Defendant Wright has made the payments and asset transfers required by this Subsection C., the remainder of the judgment against Individual Defendant Wright is suspended, subject to the Subsections below.

D. The judgment against Individual Defendants Foster and Zamora is suspended in its entirety, subject to the Subsections below.

E. The Commission's agreement to the suspension of all or part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of Defendants' sworn financial statements and related documents (collectively, Financial Attestations) submitted to the Commission, namely:

1. For Individual Defendant Gerald Wright: the Financial Statement of Gerald Wright, including attachments, signed on March 19, 2014;
2. For Individual Defendant Starlette Foster: the Financial Statement of Starlette Foster signed on January 22, 2013 and the Update of Financial Statement signed by Starlette Foster on March 20, 2014;
3. For Individual Defendant Jennifer Zamora: the Financial Statement of Jennifer Zamora, including attachments, signed on January 23, 2013 and the Update of Financial Statement signed by Jennifer Zamora on March 22, 2014;
4. For Corporate Defendant Goldman Schwartz Inc: the Financial Statement of Goldman Schwartz Inc, including attachments, signed by Gerald Wright as President on January 22, 2013 and the Update of Financial Statement signed by Gerald Wright on behalf of Goldman Schwartz Inc on March 19, 2014;

5. For Corporate Defendant Debtcom, Inc.: the Financial Statement of Debtcom, Inc., also d/b/a/ Cole, Tanner, & Wright, including attachments, signed by Gerald Wright as President on January 22, 2013 and the Update of Financial Statement signed by Gerald Wright on behalf of Debtcom, Inc. on March 19, 2014;

6. For Corporate Defendant Harris County Check Recovery Inc.: the Financial Statement of Harris County Check Recovery Inc., including attachments, signed by Gerald Wright as President on January 22, 2013 and the Update of Financial Statement signed by Gerald Wright on behalf of Harris County Check Recovery Inc. on March 19, 2014; and

7. For Corporate Defendant The G. Wright Group Inc.: the Financial Statement of The G. Wright Group Inc., including attachments, signed by Gerald Wright as President on January 22, 2013 and the Update of Financial Statement signed by Gerald Wright on behalf of The G. Wright Group Inc. on March 19, 2014.

F. The suspension of the judgment will be lifted as to any Defendant if, upon motion by the Commission, the Court finds that 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.

G. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Defendant in the amount specified in Subsection A. above (which the parties stipulate only for purposes of this Section represents the consumer injury or unjust enrichment alleged in the Complaint), less any payment previously made according 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 assets transferred under 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 civil litigation by or on behalf of the Commission, including in a proceeding to enforce its rights to any payment or monetary judgment under 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 Commission under Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order shall have collateral estoppel effect for such purposes.

K. Defendants acknowledge that their taxpayer identifying numbers (Social Security Numbers or Employer Identification Numbers), which Defendants previously submitted to the Commission, 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 paid to the Commission under this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress and any attendant expenses for any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining money for such other equitable 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 equitable relief is to be deposited to the U.S. Treasury as disgorgement. Defendants have no right to challenge any actions the Commission or its representatives may take under this Subsection.

M. The asset freeze imposed by the Amended Preliminary Injunction entered on February 6, 2013, is modified to permit the payments and transfers required by this Order. The

asset freeze on the assets of the Receivership Defendants shall remain in effect until the Receiver completes all duties, is paid all Court-approved fees and expenses, and is discharged under the Section titled "Receivership Termination." The asset freeze on the assets of Individual Defendant Wright shall remain in effect until Individual Defendant Wright has fully complied with the requirements of this Section, and thereafter the asset freeze is dissolved. The asset freeze on the assets of Individual Defendants Foster and Zamora is dissolved. Following entry of this Order, a financial institution may rely on a letter from the Commission stating that an asset freeze on a Defendant has been lifted.

IV. CONSUMER INFORMATION

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, servants, and employees, 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 consumer information to enable the Commission to efficiently administer consumer redress. If a representative of the Commission requests in writing any information related to redress, Defendants must provide it, in the form prescribed by the Commission, within 14 days;

B. disclosing, using, or benefitting from consumer information (including information contained in the Purchased Debt Portfolios described in Attachment C), including the name, address, telephone number, email address, Social Security Number, other identifying information, or any data that enables access to a consumer'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 engaging in, or assisting others engaged in, any debt collection activities; and

C. failing to destroy the consumer 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 Commission.

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

V. RECEIVERSHIP TERMINATION

IT IS FURTHER ORDERED that the appointment of Charlene Koonce as Receiver over the Receivership Defendants under Section XV of the Amended Preliminary Injunction entered on February 6, 2013 (DKT #49), is continued in full force and effect except as modified by this Section.

A. The Receiver is directed and authorized to accomplish the following:

1. Complete the liquidation or other disposition of the assets of the Receivership Defendants;
2. Complete the liquidation or other disposition of the other assets ordered to be transferred to the Receiver under the provisions of this Order. Provided, however, that, if a representative of the Commission estimates that liquidation of any such asset could result in a net loss, the representative, in writing, may direct the Receiver to decline to accept the asset transfer or to return the asset to the transferee, rather than liquidate it;
3. Within 14 days after Individual Defendant Wright has made the payments and asset transfers required by the Section titled "Monetary Judgment and Partial Suspension,"

pay, from these individual funds and assets, child support for the benefit of the minor child Jorton B. Wright, formerly known as Jorton B. Phlegm, that accrued January 14, 2013 through entry of this Order. Payments shall be made to Shwandra Y. Phlegm or the Office of the Attorney General State of Texas in accordance with Texas state law and the Order issued by the 312th Judicial District Court of Harris County, Texas in Cause Number 98-45399, OAG Number 0009211106.

4. Dissolve and wind-up the Receivership Defendants, including preparing and filing all necessary tax returns or reports, and settling and paying all necessary taxes and unemployment liabilities;

5. Prepare and file with the Court a final report describing the Receiver's activities under this Order and the Amended Preliminary Injunction, and provide a final application for compensation, expenses, and all other relief necessary to terminate the receivership estate and discharge the Receiver; and

6. Upon the Court's approval of the Receiver's final application for compensation and expenses, distribute to the Commission all remaining funds in partial satisfaction of the judgment. Such payment must be made by electric fund transfer in accordance with instructions previously provided by a representative of the Commission.

B. The Receiver must complete all duties within 180 days after the entry of this Order, but any party or the Receiver may request that the Court extend the Receiver's term for good cause. Upon completion of the above tasks, the duties of the Receivership shall terminate, and the Receiver shall be discharged.

C. Any money which the Court finds should be awarded to the Receiver may be paid only from the monies or other assets in the possession of, or under the control of, the Receiver.

No party shall have any obligation to pay any money to the Receiver for compensation or expenses.

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 Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. Individual Defendant Wright, for 15 years after entry of this Order, and Individual Defendants Foster and Zamora, for 10 years after entry of this Order, for any business that such Defendant, individually or collectively with any other Defendants, is the majority owner or controls directly or indirectly, and each Corporate Defendant, for 15 years after entry of this Order, must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, 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 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 Commission:

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 Commission may use to communicate with Defendant; (b) identify all of that 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 Individual Defendants 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 under this Order, unless previously submitted to the Commission.

2. Additionally, each 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. Individual Defendant Wright for 15 years after entry of this Order, and Individual Defendants Foster and Zamora for 10 years after entry of this Order, 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 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, 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, 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 Defendant must submit to the Commission 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 Commission 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 Commission representative in writing, all submissions to the Commission under 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. Goldman Schwartz* (X130029).

VIII. RECORDKEEPING

IT IS FURTHER ORDERED that, for 15 years after entry of this Order, Corporate Defendants and Individual Defendant Wright, and for 10 years after entry of this Order, Individual Defendants Foster and Zamora, must create certain records, and retain each such record for 5 years. Specifically, Corporate Defendants and each 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 Commission; and
- E. a copy of each unique advertisement or other marketing material.

IX. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with this Order, including the Financial Attestations 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 Commission, 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 Commission 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 telephonic depositions), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission is authorized to communicate directly with each Defendant. Defendant must permit representatives of the Commission to interview any employee or other person affiliated with any Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission 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, under Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-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.

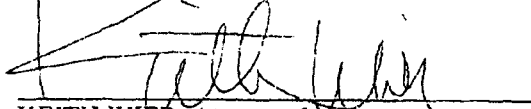
SO ORDERED this 28th day of MAY, 2014.



JUDGE GRAY H. MILLER
UNITED STATES DISTRICT JUDGE

SO STIPULATED AND AGREED:

FOR DEFENDANTS:



Date: 3/19/2014

KEITH WIER, Attorney-in-Charge
Tex. Bar No. 21436100, Southern District of Texas Bar No. 7930
W. ED WALTON,
Tex. Bar No. 20828550, Southern District of Texas Bar No. _____
Bush & Ramirez, P.L.L.C.
5615 Kirby Drive, Suite 900
Houston, TX 77005
(713) 626-1555 (Phone)
(713) 622-8077 (Fax)
kwier@bushramirez.com
COUNSEL for: Gerald Wright; Starlette Foster;
Jennifer Zamora; Goldman Schwartz Inc;
Debtcom, Inc.; Harris County Check Recovery Inc.;
and The G. Wright Group Inc.


DEFENDANTS:

GOLDMAN SCHWARTZ INC


By: GERALD WRIGHT, President of
Goldman Schwartz Inc

Date: 3/19/14

DEBTCOM, INC.


By: GERALD WRIGHT, President of
Debtcom, Inc.

Date: 3/19/14

HARRIS COUNTY CHECK RECOVERY INC.


By: GERALD WRIGHT, President of
Harris County Check Recovery Inc.

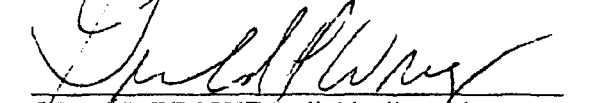
Date: 3/19/14

THE G. WRIGHT GROUP INC.


By: GERALD WRIGHT, President of
The G. Wright Group Inc.

Date: 3/19/14

GERALD WRIGHT


GERALD WRIGHT, Individually, and as
President of Goldman Schwartz Inc, Debtcom, Inc.,
Harris County Check Recovery Inc., and
The G. Wright Group Inc.

Date: 3/19/14

STARLETTE FOSTER


STARLETTE FOSTER, Individually

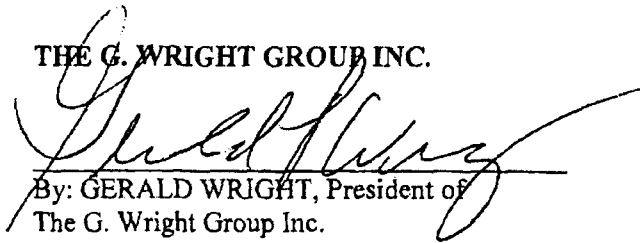
Date: 3-20-14

JENNIFER ZAMORA

JENNIFER ZAMORA, Individually

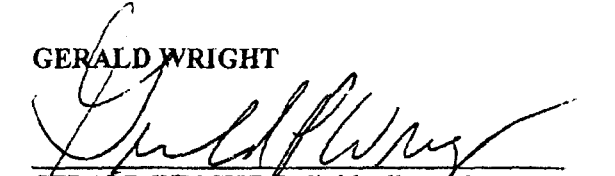
Date: _____

THE G. WRIGHT GROUP INC.


By: GERALD WRIGHT, President of
The G. Wright Group Inc.

Date: 3/19/14

GERALD WRIGHT


GERALD WRIGHT, Individually, and as
President of Goldman Schwartz Inc, Debtcom, Inc.,
Harris County Check Recovery Inc., and
The G. Wright Group Inc.

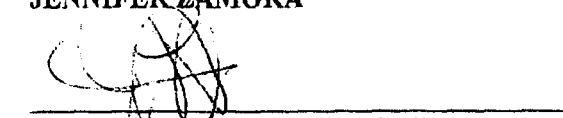
Date: 3/19/14

STARLETTE FOSTER


STARLETTE FOSTER, Individually

Date: 3-20-14

JENNIFER ZAMORA


JENNIFER ZAMORA, Individually

Date: 3/25/14
²⁴

FOR PLAINTIFF:

FEDERAL TRADE COMMISSION



Date: 5/16/14

THOMAS B. CARTER, Attorney-In-Charge,
Tex. Bar No. 03932300, Southern District of Texas Bar No. 239381

ERIC ROBERSON,
Tex. Bar No. 00792803, Southern District of Texas Bar No. 20890

LUIS H. GALLEGOS,
Okla. Bar No. 19098, Southern District of Texas *Pro Hac Vice*

Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

(214) 979-9372; tcarter@ftc.gov (Carter)
(214) 979-9362; eroberson@ftc.gov (Roberson)
(214) 979-9383; lgallegos@ftc.gov (Gallegos)
(214) 953-3079 (Fax)