UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

FEDERAL TRADE COMMISSION,

laintiff,

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THEFBAMACHINE INC., a corporation;

ASSIVE SCALING INC., a corporation;

SALES.SUPPORT NEW JERSEY INC., a corporation;

1HR DELIVERIES INC., a corporation;

HOURLY RELIEF INC., a corporation;

3PL LOGISTIC AUTOMATION INC., a corporation;

FBA SUPPORT NJ CORP., a corporation;

DAILY DISTRO LLC, a limited liability company;

CLOSTER GREEN CORP., doing business as WRAITH & CO., a corporation; and

BRATISLAV ROZENFELD, also known as Steven Rozenfeld and Steven Rozen, individually and as a officer or owner of THEFBAMACHINE INC., ASSIVE SCALING INC., SALES.SUPPORT NEW JERSEY INC., 1HR DELIVERIES INC., HOURLY RELIEF INC., 3PL OGISTIC AUTOMATION INC., FBA SUPPORT NJ CORP., DAILY DISTRO LLC, and CLOSTER GREEN CORP., doing business as WRAITH & CO., a corporation,

Defendants.

Civil Action No. 24-6635 (JXN) (LDW)

EX PARTE
TEMPORARY RESTRAINING ORDER
WITH ASSET FREEZE, APPOINTMENT
OF A TEMPORARY RECEIVER, AND
OTHER QUITABLE RELIEF, AND
OR R TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION SHOULD
NOT ISSUE

FILED UNDER SEAL

Plaintiff, the Federal Trade Commission, has filed its Complaint for Permanent Injunction, Monetary Judgment, and Other Equitable Relief pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b), 57b (Docket No. 1), and has moved, pursuant to Fed. R. Civ. P. 65(b), for a temporary restraining order, asset freeze, other equitable relief, and an order to show cause why a preliminary injunction should not issue against TheFBAMachine Inc.; Passive Scaling Inc.; Sales Support New Jersey Inc.; 1HR Deliveries Inc.; Hourly Relief Inc.; 3PL Logistic Automation Inc.; FBA Support NJ Corp.; Daily Distro LLC; Closter Green, doing business as Wraith & Co.; and Bratislav Rozenfeld, also known as Steven Rozenfeld and Steven Rozen (collectively, "Defendants") (Docket No.1-16).

FINDINGS OF FACT

The Court, having considered the Complaint, the Emergent *Ex Parte* Application for a Temporary Restraining Order, declarations, exhibits, and the memorandum of points and authorities filed in support thereof, and being otherwise advised, finds that:

- A. This Court has jurisdiction over the subject matter of this case, and there is good cause to believe that it will have jurisdiction over all parties hereto and that venue in this district is proper.
- B. In numerous instances, Defendants, in the marketing and selling of business opportunities and coaching services ("Defendants' Products"), have violated the FTC Act and rules governing their conduct. Specifically, Defendants have (1) made false or unsubstantiated earnings claims, (2) violated multiple trade regulation rule provisions in the selling of Defendants' Products, and (3) used threats and non-disparagement clauses to discourage purchasers from publishing truthful reviews about Defendants and their products or services.

- C. There is good cause to believe that Defendants have engaged in and are likely to engage in acts or practices that violate Section 5(a) of the FTC Act, 15 U.S.C. § 45(a); the FTC's Trade Regulation Rule entitled "Disclosure Requirements and Prohibitions Concerning Business Opportunities" ("Business Opportunity Rule" or "Rule"), 16 C.F.R. Part 437, as amended; and the Consumer Review Fairness Act ("CRFA"), 15 U.S.C. § 45b, and that Plaintiff is therefore likely to prevail on the merits of this action. As demonstrated by the declarations of consumers who purchased Defendants' Products, investigator declarations, transcripts of sales calls, and the additional evidence contained in the FTC's pages of exhibits, the FTC has established a likelihood of success in showing that, in numerous instances, Defendants have made false or unsubstantiated statements, and engaged in other unfair or deceptive acts or practices in the marketing of Defendants' Products.
- D. There is good cause to believe that Defendants have taken at least \$11.1 million from consumers in connection with their unlawful practices.
- E. There is good cause to believe that immediate and irreparable harm will result from Defendants' ongoing violations of the FTC Act, the Business Opportunity Rule, and the CRFA unless Defendants are restrained and enjoined by order of this Court.
- F. There is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief for consumers—including monetary restitution, rescission, or refunds—will occur from the sale, transfer, destruction, or other disposition or concealment by Defendants of their assets or records, unless Defendants are immediately restrained and enjoined by order of this Court; and that, in accordance with Fed. R. Civ. P. 65(b), the interests of justice require that this Order be granted without prior notice to Defendants.

Thus, there is good cause for relieving Plaintiff of the duty to provide Defendants with prior notice of its Application for a Temporary Restraining Order.

- G. Good cause exists for appointing a temporary receiver over the Receivership Entities, freezing Defendants' assets, permitting Plaintiff and the Receiver immediate access to the Defendants' business premises, and permitting Plaintiff and the Receiver to take expedited discovery.
- H. Weighing the equities and considering Plaintiff's likelihood of ultimate success on the merits, a temporary restraining order with an asset freeze, the appointment of a temporary receiver, immediate access to business premises, expedited discovery, and other equitable relief is in the public interest.
- I. This Court has authority to issue this Order pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b); Fed. R. Civ. P. 65; and the All Writs Act, 28 U.S.C. § 1651.
- J. No security is required of any agency of the United States for issuance of a temporary restraining order. Fed. R. Civ. P. 65(c).

DEFINITIONS

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

- A. "Asset" means any legal or equitable interest in, right to, or claim to, any property, wherever located and by whomever held.
- B. "Corporate Defendants" means TheFBAMachine Inc.; Passive Scaling Inc.; Sales Support New Jersey Inc.; 1HR Deliveries Inc.; Hourly Relief Inc.; 3PL Logistic Automation Inc.; FBA Support NJ Corp.; Daily Distro LLC; and Closter Green Corp., doing business as Wraith & Co.; and each of their subsidiaries, affiliates, successors, and assigns.

- C. "Defendants" means the Corporate Defendants and the Individual Defendant, individually, collectively, or in any combination.
- D. "Document" is synonymous in meaning and equal in scope to the usage of "document" and "electronically stored information" in Fed. R. Civ. P. 34(a) and includes writings, drawings, graphs, charts, photographs, sound and video recordings, images, Internet sites, web pages, websites, electronic correspondence, including e-mail and instant messages, contracts, accounting data, advertisements, FTP Logs, Server Access Logs, books, written or printed records, handwritten notes, telephone logs, telephone scripts, receipt books, ledgers, personal and business canceled checks and check registers, bank statements, appointment books, computer records, customer or sales databases and any other electronically stored information, including Documents located on remote servers or cloud computing systems, and other data or data compilations from which information can be obtained directly or, if necessary, after translation into a reasonably usable form. A draft or non-identical copy is a separate document within the meaning of the term.
- E. "Earnings Claim(s)" means any oral, written, or visual representation to a prospective purchaser that conveys, expressly or by implication, a specific level or range of actual or potential sales, or gross or net income or profits. Earnings Claims include, but are not limited to: (1) any chart, table, or mathematical calculation that demonstrates possible results based upon a combination of variables; and (2) any statements from which a prospective purchaser can reasonably infer that he or she will earn a minimum level of income.
- F. "Electronic Data Host" means any person or entity in the business of storing, hosting, or otherwise maintaining electronically stored information. This includes, but is not

limited to, any entity hosting a website or server, and any entity providing "cloud based" electronic storage.

- G. "General Media" means any instrumentality through which a person may communicate with the public, including, but not limited to, television, radio, print, Internet, billboard, website, commercial bulk email, and mobile communications.
 - H. "Individual Defendant" means Bratislav Rozenfeld.
- I. "Receiver" means the temporary receiver appointed in Section XI of this Order and any deputy receivers that shall be named by the temporary receiver.
- J. "Receivership Entities" means Corporate Defendants as well as any other entity that has conducted any business related to the marketing and sale of Defendants' Products, 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 any Defendant.

ORDER

I. PROHIBITED BUSINESS ACTIVITIES

IT IS THEREFORE ORDERED 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 temporarily restrained and enjoined from:

A. Making any Earnings Claims to a prospective purchaser, unless the Earnings Claim is non-misleading and, at the time the Earnings Claims is made, Defendants (1) have a reasonable basis for the claim; (2) have in their possession written materials that substantiate the claimed earnings; and (3) make the written substantiation for Earnings Claims available upon request to the consumer, potential purchaser or investor, the Receiver, and the FTC;

- B. Making any Earnings Claims in the General Media, unless the Earnings Claim is non-misleading and, at the time the Earnings Claims is made, Defendants (1) have a reasonable basis for the claim; (2) have in their possession written materials that substantiate the claimed earnings; and (3) state in immediate conjunction with the claim (a) the beginning and ending dates when the represented earnings were achieved and (b) the number and percentage of all persons who purchased Defendant's products or services prior to the ending date in Section I.B.3.a who achieved at least the stated level of earnings;
- C. Disseminating any industry financial, earnings, or performance information, unless Defendants have written substantiation demonstrating that the information reflects, or does not exceed, the typical or ordinary financial, earnings, or performance experience of purchasers of Defendants' products or services;
- D. Failing to provide any consumer, potential purchaser, or investor with disclosure documents in the form and manner required by 16 C.F.R. §§ 437.2, 437.3(a)(1)-(5), and 437.4;
- E. Misrepresenting or assisting others in misrepresenting, expressly or by implication, that Defendants' products or services:
 - 1. Will allow purchasers to earn a specific level or range of actual or potential sales, or gross or net income or profits, revenues, financial gains, percentage gains, or return on investment with little to no effort on their part; and
 - 2. Will use artificial intelligence to maximize revenues;
- F. Misrepresenting or assisting others in misrepresenting, expressly or by implication, any other fact material to consumers concerning any good or service, such as: the total costs; any material restrictions, limitations, or conditions; or any material aspect of its performance, efficacy, nature, or central characteristics; and

G. Prohibiting or restricting any consumer, potential purchaser, or investor from communicating reviews, performance assessments, and similar analyses about Defendants' products or services, or the conduct of Defendants; or that impose a penalty or fee against any consumer, potential purchaser, or investor who engages in such communications.

II. PROHIBITION ON RELEASE OF CUSTOMER INFORMATION

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 temporarily restrained and enjoined from:

- A. Selling, renting, leasing, transferring, or otherwise disclosing, the name, address, birth date, telephone number, email address, credit card number, bank account number, Social Security number, or other financial or identifying information of any person that any Defendant obtained in connection with any activity that pertains to the subject matter of this Order; and
- B. Benefitting from or using the name, address, birth date, telephone number, email address, credit card number, bank account number, Social Security number, or other financial or identifying information of any person that any Defendant obtained in connection with any activity that pertains to the subject matter of this Order.

Provided, however, that Defendants may disclose such identifying information to a law enforcement agency; to their attorneys as required for their defense; as required by any law, regulation, or court order; or in any filings, pleadings, or discovery in this action in the manner required by the Federal Rules of Civil Procedure and by any protective order in the case.

III. ASSET FREEZE

IT IS FURTHER ORDERED that Defendants and their 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 temporarily restrained and enjoined from:

- A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, relinquishing, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any Assets that are:
 - 1. owned or controlled, directly or indirectly, by any Defendant;
 - 2. held, in part or in whole, for the benefit of any Defendant;
 - 3. in the actual or constructive possession of any Defendant; or
 - owned or controlled by, in the actual or constructive possession of, or otherwise held for the benefit of, any corporation, partnership, asset protection trust, or other entity that is directly or indirectly owned, managed, or controlled by any Defendant.
- B. Opening or causing to be opened any safe deposit boxes, commercial mailboxes, or storage facilities titled in the name of any Defendant, or subject to access by any Defendant, except as necessary to comply with written requests from the Receiver acting pursuant to its authority under this Order;
- C. Incurring charges or cash advances on any credit, debit, or ATM card issued in the name, individually or jointly, of any Corporate Defendant or any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by any Defendant or of which any Defendant is an officer, director, member, or manager. This includes any corporate bankcard or corporate credit card account for which any Defendant is, or was on the date that this Order was signed, an authorized signor; or

D. Cashing any checks or depositing any money orders or cash received from consumers, clients, or customers of any Defendant.

The Assets affected by this Section shall include: (1) all Assets of Defendants as of the time this Order is entered; and (2) Assets obtained by Defendants after this Order is entered if those Assets are derived from any activity that is the subject of the Complaint in this matter or that is prohibited by this Order. This Section does not prohibit any transfers to the Receiver or repatriation of foreign Assets specifically required by this order.

IV. DUTIES OF ASSET HOLDERS AND OTHER THIRD PARTIES

IT IS FURTHER ORDERED that any financial or brokerage institution, Electronic Data Host, credit card processor, payment processor, merchant bank, acquiring bank, independent sales organization, third party processor, payment gateway, insurance company, business entity, or person who receives actual notice of this Order (by service or otherwise) that:

- (a) has held, controlled, or maintained custody, through an account or otherwise, of any Document on behalf of any Defendant or any Asset that has been owned or controlled, directly or indirectly, by any Defendant; held, in part or in whole, for the benefit of any Defendant; in the actual or constructive possession of any Defendant; or owned or controlled by, in the actual or constructive possession of, or otherwise held for the benefit of, any corporation, partnership, asset protection trust, or other entity that is directly or indirectly owned, managed or controlled by any Defendant;
- (b) has held, controlled, or maintained custody, through an account or otherwise, of any Document or Asset associated with credits, debits, or charges made on behalf of any Defendant, including reserve funds held by payment processors, credit card processors, merchant banks, acquiring banks, independent sales organizations, third party processors, payment gateways, insurance companies, or other entities; or

- (c) has extended credit to any Defendant, including through a credit card account, shall:
- A. Hold, preserve, and retain within its control and prohibit the withdrawal, removal, alteration, assignment, transfer, pledge, encumbrance, disbursement, dissipation, relinquishment, conversion, sale, or other disposal of any such Document or Asset, as well as all Documents or other property related to such Assets, except by further order of this Court; provided, however, that this provision does not prohibit Individual Defendant from incurring charges on a personal credit card established prior to entry of this Order, up to the pre-existing credit limit;
- B. Deny any person, except the Receiver, access to any safe deposit box, commercial mailbox, or storage facility that is titled in the name of any Defendant, either individually or jointly, or otherwise subject to access by any Defendant;
- C. Provide Plaintiff's counsel and the Receiver, within three (3) days of receiving a copy of this Order, a sworn statement setting forth, for each Asset or account covered by this Section:
 - 1. The identification number of each such account or Asset;
 - 2. The balance of each such account, or a description of the nature and value of each such Asset as of the close of business on the day on which this Order is served, and, if the account or other Asset has been closed or removed, the date closed or removed, the total funds removed in order to close the account, and the name of the person or entity to whom such account or other Asset was remitted; and
 - 3. The identification of any safe deposit box, commercial mailbox, or storage facility that is either titled in the name, individually or jointly, of any Defendant, or is otherwise subject to access by any; and

D. Upon the request of Plaintiff's counsel or the Receiver, promptly provide Plaintiff's counsel and the Receiver with copies of all records or other Documents pertaining to any account or Asset covered by this Section, including originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, including wire transfers and wire transfer instructions, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and all logs and records pertaining to safe deposit boxes, commercial mailboxes, and storage facilities.

Provided, however, that this Section does not prohibit any transfers to the Receiver or repatriation of foreign Assets specifically required by this order.

V. FINANCIAL DISCLOSURES

IT IS FURTHER ORDERED that each Defendant, within five (5) days of service of this Order upon them, shall prepare and deliver to Plaintiff's counsel and the Receiver:

- A. completed financial statements on the forms attached to this Order as **Attachment**A (Financial Statement of Individual Defendant) for Individual Defendant, and **Attachment B**(Financial Statement of Corporate Defendant) for each Corporate Defendant; and
- B. completed **Attachment C** (IRS Form 4506, Request for Copy of a Tax Return) for each Individual Defendant and Corporate Defendant.

VI. FOREIGN ASSET REPATRIATION

IT IS FURTHER ORDERED that within five (5) days following the service of this Order, each Defendant shall:

A. Provide Plaintiff's counsel and the Receiver with a full accounting, verified under oath and accurate as of the date of this Order, of all Assets, Documents, and accounts outside of the United States which are: (1) titled in the name, individually or jointly, of any Defendant; (2) held by any person or entity for the benefit of any Defendant, or for the benefit of any

corporation, partnership, asset protection trust, or other entity that is directly or indirectly owned, managed, or controlled by any Defendant; or (3) under the direct or indirect control, whether jointly or singly, of any Defendant;

- B. Take all steps necessary to provide Plaintiff's counsel and Receiver access to all Documents and records that may be held by third parties located outside of the territorial United States of America, including signing the Consent to Release of Financial Records appended to this Order as **Attachment D**;
- C. Transfer to the territory of the United States all Documents and Assets located in foreign countries which are: (1) titled in the name, individually or jointly, of any Defendant; (2) held by any person or entity for the benefit of any Defendant, or for the benefit of any corporation, partnership, asset protection trust, or other entity that is directly or indirectly owned, managed, or controlled by any Defendant; or (3) under the direct or indirect control, whether jointly or singly, of any Defendant; and
- D. The same business day as any repatriation, (1) notify the Receiver and counsel for Plaintiff of the name and location of the financial institution or other entity that is the recipient of such Documents or Assets; and (2) serve this Order on any such financial institution or other entity.

VII. NON-INTERFERENCE WITH REPATRIATION

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 temporarily restrained and enjoined from taking any action, directly or indirectly, which may result in the encumbrance or dissipation of foreign Assets, or in the hindrance of the repatriation required by this Order, including, but not limited to:

- A. Sending any communication or engaging in any other act, directly or indirectly, that results in a determination by a foreign trustee or other entity that a "duress" event has occurred under the terms of a foreign trust agreement until such time that all Defendants' Assets have been fully repatriated pursuant to this Order; or
- B. Notifying any trustee, protector, or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a court order, until such time that all Defendants' Assets have been fully repatriated pursuant to this Order.

VIII. CONSUMER CREDIT REPORTS

IT IS FURTHER ORDERED that Plaintiff may obtain credit reports concerning Individual Defendant pursuant to Section 604(a)(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)(1), and that, upon written request, any credit reporting agency from which such reports are requested shall provide them to Plaintiff.

IX. PRESERVATION OF RECORDS

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 temporarily restrained and enjoined from:

A. Destroying, erasing, falsifying, writing over, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, Documents that relate to: (1) the business, business practices, Assets, or business or personal finances of any Defendant; (2) the business practices or finances of entities directly or indirectly under the control of any Defendant; or (3) the business practices or finances of entities directly or indirectly under common control with any other Defendant; and

B. Failing to create and maintain Documents that, in reasonable detail, accurately, fairly, and completely reflect Defendants' incomes, disbursements, transactions, and use of Defendants' Assets.

X. REPORT OF NEW BUSINESS ACTIVITY

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 temporarily restrained and enjoined from creating, operating, or exercising any control over any business entity, whether newly formed or previously inactive, including any partnership, limited partnership, joint venture, sole proprietorship, or corporation, without first providing Plaintiff's counsel and the Receiver with a written statement disclosing: (1) the name of the business entity; (2) the address and telephone number of the business entity; (3) the names of the business entity's officers, directors, principals, managers, and employees; and (4) a detailed description of the business entity's intended activities.

XI. TEMPORARY RECEIVER

IT IS FURTHER ORDERED that <u>Anthony Sodono, III</u> is appointed as temporary receiver of the Receivership Entities with full powers of an equity receiver. The Receiver shall be solely the agent of this Court in acting as Receiver under this Order.

XII. DUTIES AND AUTHORITY OF RECEIVER

IT IS FURTHER ORDERED that the Receiver is directed and authorized to accomplish the following:

A. Assume full control of Receivership Entities by removing, as the Receiver deems necessary or advisable, any director, officer, independent contractor, employee, attorney, or

agent of any Receivership Entity from control of, management of, or participation in, the affairs of the Receivership Entity;

- B. Take exclusive custody, control, and possession of all Assets and Documents of, or in the possession, custody, or under the control of, any Receivership Entity, wherever situated;
- C. Take exclusive custody, control, and possession of all Documents or Assets associated with credits, debits, or charges made on behalf of any Receivership Entity, wherever situated, including reserve funds held by payment processors, credit card processors, merchant banks, acquiring banks, independent sales organizations, third party processors, payment gateways, insurance companies, or other entities;
- D: Conserve, hold, manage, and prevent the loss of all Assets of the Receivership Entities, and perform all acts necessary or advisable to preserve the value of those Assets. The Receiver shall assume control over the income and profits therefrom and all sums of money now or hereafter due or owing to the Receivership Entities. The Receiver shall have full power to sue for, collect, and receive, all Assets of the Receivership Entities and of other persons or entities whose interests are now under the direction, possession, custody, or control of the Receivership Entities. Provided, however, that the Receiver shall not attempt to collect any amount from a consumer if the Receiver believes the consumer's debt to the Receivership Entities has resulted from the deceptive acts or practices or other violations of law alleged in the Complaint in this matter, without prior Court approval;
- E. Obtain, conserve, hold, manage, and prevent the loss of all Documents of the Receivership Entities, and perform all acts necessary or advisable to preserve such Documents. The Receiver shall: divert mail; preserve all Documents of the Receivership Entities that are accessible via electronic means (such as online access to financial accounts and access to

electronic documents held onsite or by Electronic Data Hosts) by changing usernames, passwords, or other log-in credentials; take possession of all electronic Documents of the Receivership Entities stored onsite or remotely; take whatever steps necessary to preserve all such Documents; and obtain the assistance of the FTC's Digital Forensic Unit for the purpose of obtaining electronic documents stored onsite or remotely;

- F. Choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order;
- G. Make payments and disbursements from the receivership estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order, and to incur, or authorize the making of, such agreements as may be necessary and advisable in discharging his or her duties as Receiver. The Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Receivership Entities prior to the date of entry of this Order, except payments that the Receiver deems necessary or advisable to secure Assets of the Receivership Entities, such as rental payments;
- H. Take all steps necessary to secure and take exclusive custody of each location from which the Receivership Entities operate their businesses. Such steps may include, but are not limited to, any of the following, as the Receiver deems necessary or advisable: (1) securing the location by changing the locks and alarm codes and disconnecting any internet access or other means of access to the computers, servers, internal networks, or other records maintained at that location; and (2) requiring any persons present at the location to leave the premises, to provide the Receiver with proof of identification, and/or to demonstrate to the satisfaction of the Receiver that such persons are not removing from the premises Documents or Assets of the

Receivership Entities. Law enforcement personnel, including, but not limited to, police or sheriffs, may assist the Receiver in implementing these provisions in order to keep the peace and maintain security. If requested by the Receiver, the United States Marshal will provide appropriate and necessary assistance to the Receiver to implement this Order and is authorized to use any necessary and reasonable force to do so;

- I. Take all steps necessary to prevent the modification, destruction, or erasure of any web page or website registered to and operated, in whole or in part, by any Defendants, and to provide access to all such web pages or websites to Plaintiff's representatives, agents, and assistants, as well as Defendants and their representatives;
 - J. Enter into and cancel contracts and purchase insurance as advisable or necessary;
- K. Prevent the inequitable distribution of Assets and determine, adjust, and protect the interests of consumers who have transacted business with the Receivership Entities;
- L. Make an accounting, as soon as practicable, of the Assets and financial condition of the receivership and file the accounting with the Court and deliver copies thereof to all parties;
- M. Institute, compromise, adjust, appear in, intervene in, defend, dispose of, or otherwise become party to any legal action in state, federal, or foreign courts or arbitration proceedings as the Receiver deems necessary and advisable to preserve or recover the Assets of the Receivership Entities, or to carry out the Receiver's mandate under this Order, including but not limited to, actions challenging fraudulent or voidable transfers;
- N. Issue subpoenas to obtain Documents and records pertaining to the Receivership, and conduct discovery in this action on behalf of the receivership estate, in addition to obtaining other discovery as set forth in this Order;

- O. Open one or more bank accounts at designated depositories for funds of the Receivership Entities. The Receiver shall deposit all funds of the Receivership Entities in such designated accounts and shall make all payments and disbursements from the receivership estate from such accounts. The Receiver shall serve copies of monthly account statements on all parties;
 - P. Maintain accurate records of all receipts and expenditures incurred as Receiver;
- Q. Allow Plaintiff's representatives, agents, and assistants, as well as Defendants' representatives and Defendants themselves, reasonable access to the premises of the Receivership Entities, or any other premises where the Receivership Entities conduct business. The purpose of this access shall be to inspect and copy any and all books, records, Documents, accounts, and other property owned by, or in the possession of, the Receivership Entities or their agents. The Receiver shall have the discretion to determine the time, manner, and reasonable conditions of such access;
- R. Allow Plaintiff's representatives, agents, and assistants, as well as Defendants and their representatives, reasonable access to all Documents in the possession, custody, or control of the Receivership Entities;
- S. Cooperate with reasonable requests for information or assistance from any state or federal civil or criminal law enforcement agency;
- T. Suspend business operations of the Receivership Entities if in the judgment of the Receiver such operations cannot be continued legally and profitably;
- U. If the Receiver identifies a nonparty entity as a Receivership Entity, promptly notify the entity as well as the parties, and inform the entity that it can challenge the Receiver's determination by filing a motion with the Court. Provided, however, that the Receiver may delay

providing such notice until the Receiver has established control of the nonparty entity and its assets and records, if the Receiver determines that notice to the entity or the parties before the Receiver establishes control over the entity may result in the destruction of records, dissipation of assets, or any other obstruction of the Receiver's control of the entity;

- V. If in the Receiver's judgment the business operations cannot be continued legally and profitably, take all steps necessary to ensure that any of the Receivership Entities' web pages or websites relating to the activities alleged in the Complaint cannot be accessed by the public, or are modified for consumer education and/or informational purposes, and take all steps necessary to ensure that any telephone numbers associated with the Receivership Entities cannot be accessed by the public, or are answered solely to provide consumer education or information regarding the status of operations; and
- W. Prepare a written report at or before any hearing described in Section XXVI that describes (1) the steps taken by the Receiver to implement the terms of the Order; (2) the value of all assets and sum of all liabilities of the Receivership Entities; (3) the steps the Receiver intends to take in the future to protect receivership assets, recover receivership assets from third parties, and adjust receivership liabilities; (4) the Receiver's opinion on whether any portion of the business of any of the Receivership Entities can continue to operate legally and profitably; and (5) any other matters which the Receiver believes should be brought to the Court's attention.

XIII. TRANSFER OF RECEIVERSHIP PROPERTY TO RECEIVER

IT IS FURTHER ORDERED that Defendants and any other person with possession, custody, or control of property of, or records relating to, the Receivership Entities shall, upon notice of this Order by personal service or otherwise, fully cooperate with and assist the Receiver in taking and maintaining possession, custody, or control of the Assets and Documents of the

Receivership Entities and immediately transfer or deliver to the Receiver possession, custody, and control of, the following:

- A. All Assets held by or for the benefit of the Receivership Entities;
- B. All Documents or Assets associated with credits, debits, or charges made on behalf of any Receivership Entity, wherever situated, including reserve funds held by payment processors, credit card processors, merchant banks, acquiring banks, independent sales organizations, third party processors, payment gateways, insurance companies, or other entities;
 - C. All Documents of or pertaining to the Receivership Entities;
- D. All computers, electronic devices, mobile devices, and machines used to conduct the business of the Receivership Entities;
- E. All Assets and Documents belonging to other persons or entities whose interests are under the direction, possession, custody, or control of the Receivership Entities; and
- F. All keys, codes, user names, and passwords necessary to gain or to secure access to any Assets or Documents of or pertaining to the Receivership Entities, including access to their business premises, means of communication, accounts, computer systems (onsite and remote), Electronic Data Hosts, or other property.

In the event that any person or entity fails to deliver or transfer any Asset or Document, or otherwise fails to comply with any provision of this Section, the Receiver may file an Affidavit of Non-Compliance regarding the failure and a motion seeking compliance or a contempt citation.

XIV. PROVISION OF INFORMATION TO RECEIVER

IT IS FURTHER ORDERED that Defendants shall immediately provide to the Receiver:

- A. A list of all Assets and accounts of the Receivership Entities that are held in any name other than the name of a Receivership Entity, or by any person or entity other than a Receivership Entity;
- B. A list of all agents, employees, officers, attorneys, servants, and those persons in active concert and participation with the Receivership Entities, or who have been associated or done business with the Receivership Entities; and
- C. A description of any Documents covered by attorney-client privilege or attorney work product, including files where such Documents are likely to be located, authors or recipients of such Documents, and search terms likely to identify such electronic Documents.

XV. COOPERATION WITH THE RECEIVER

IT IS FURTHER ORDERED that Defendants; Receivership Entities; Defendants' or Receivership Entities' officers, agents, employees, and attorneys; all other persons in active concert or participation with any of them; and any other person with possession, custody, or control of property of or records relating to the Receivership Entities who receive actual notice of this Order shall fully cooperate with and assist the Receiver. This cooperation and assistance shall include, but is not limited to, providing information to the Receiver that the Receiver deems necessary to exercise the authority and discharge the responsibilities of the Receiver under this Order; providing any keys, codes, user names, and passwords required to access any computers, electronic devices, mobile devices, and machines (onsite or remotely) and any cloud account (including specific method to access account) or electronic file in any medium; advising all persons who owe money to any Receivership Entity that all debts should be paid directly to the Receiver; and transferring funds at the Receiver's direction and producing records related to the Assets and sales of the Receivership Entities.

XVI. NON-INTERFERENCE WITH THE RECEIVER

IT IS FURTHER ORDERED that Defendants; Receivership Entities; Defendants' or Receivership

Entities' 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, and any other person served with a copy of this Order, are hereby restrained and enjoined from directly or indirectly:

- A. Interfering with the Receiver's efforts to manage, or take custody, control, or possession of, the Assets or Documents subject to the receivership;
 - B. Transacting any of the business of the Receivership Entities;
- C. Transferring, receiving, altering, selling, encumbering, pledging, assigning, liquidating, or otherwise disposing of any Assets owned, controlled, or in the possession or custody of, or in which an interest is held or claimed by, the Receivership Entities; or
- D. Refusing to cooperate with the Receiver or the Receiver's duly authorized agents in the exercise of their duties or authority under any order of this Court.

XVII. STAY OF ACTIONS

IT IS FURTHER ORDERED that, except by leave of this Court, during the pendency of the receivership ordered herein, Defendants; Defendants' officers, agents, employees, attorneys; and all other persons in active concert or participation with any of them, who receive actual notice of this Order; and their corporations, subsidiaries, divisions, or affiliates; and all investors, creditors, stockholders, lessors, customers, and other persons seeking to establish or enforce any claim, right, or interest against or on behalf of Defendants, and all others acting for or on behalf of such persons, are hereby enjoined from taking action that would interfere with the exclusive jurisdiction of this Court over the Assets or Documents of the Receivership Entities, including, but not limited to:

- A. Filing or assisting in the filing of a petition for relief under the Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, or of any similar insolvency proceeding on behalf of the Receivership Entities;
- B. Commencing, prosecuting, or continuing a judicial, administrative, or other action or proceeding against the Receivership Entities, including the issuance or employment of process against the Receivership Entities, except that such actions may be commenced if necessary to toll any applicable statute of limitations; or
- C. Filing or enforcing any lien on any asset of the Receivership Entities; taking or attempting to take possession, custody, or control of any Asset of the Receivership Entities; or attempting to foreclose, forfeit, alter, or terminate any interest in any Asset of the Receivership Entities, whether such acts are part of a judicial proceeding, acts of self-help, or otherwise.

Provided, however, that this Order does not stay: (1) the commencement or continuation of a criminal action or proceeding; (2) the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or (3) the enforcement of a judgment, other than a money judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power.

XVIII. COMPENSATION OF RECEIVER

IT IS FURTHER ORDERED that the Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the Assets now held by, in the possession or control of, or which may be received by, the Receivership Entities. The Receiver shall file with the Court and serve on the parties periodic requests for the payment of such reasonable

compensation, with the first such request filed no more than sixty (60) days after the date of entry of this Order. The Receiver shall not increase the hourly rates used as the bases for such fee applications without prior approval of the Court.

XIX. RECEIVER'S BOND

IT IS FURTHER ORDERED that the Receiver shall file with the Clerk of this Court a bond in the sum of \$35,000 with sureties to be approved by the Court, conditioned that the Receiver will well and truly perform the duties of the office and abide by and perform all acts the Court directs. 28 U.S.C. § 754.

XX. IMMEDIATE PRODUCTION OF BUSINESS RECORDS

IT IS FURTHER ORDERED that that the Corporate Defendants shall allow the Receiver and FTC's employees and agents access to the Corporate Defendants' business records to inspect and copy Documents in preparation for the preliminary injunction hearing and to identify and locate assets.

The Corporate Defendants shall, immediately upon receiving notice of this Order, produce to the FTC for inspection, inventory, and copying, at a location designated by FTC, the following materials: (1) all customer information, including names, phone numbers, addresses, e-mail addresses, customer complaints, and payment information for all consumers who have purchased Corporate Defendants' business opportunities and coaching services; (2) all contracts, including settlement agreements with customers; (3) any correspondence, including electronic correspondence, that refers or relates to the Corporate Defendants' business opportunities and coaching services; (4) an electronic copy of all advertisements for the Corporate Defendants' business opportunities and coaching services; (5) all telephone and videoconferencing scripts used during the sales process; (6) all slide decks, sales projections, charts, and spreadsheets used during the sales process; (7) all Documents pertaining to Earnings Claims and other

representations related to the marketing, advertising, promotion, offer for sale, or sale of Defendants' business opportunities and coaching services, including substantiation for any Earnings Claims; and (8) accounting information, including profit and loss statements, annual reports, receipt books, ledgers, personal and business canceled checks and check registers, bank statements, appointment books, copies of federal, state or local business or personal income or property tax returns, and 1099 forms. The FTC shall return any materials produced pursuant to this Section within seven (7) days of the Corporate Defendants' production.

XXI. IMMEDIATE ACCESS TO BUSINESS PREMISES AND RECORDS IT IS FURTHER ORDERED that:

- A. In order to allow Plaintiff and the Receiver to preserve Assets and evidence relevant to this action and to expedite discovery, Plaintiff and the Receiver, and their representatives, agents, contractors, and assistants, shall have immediate access to the business premises and storage facilities owned, controlled, or used by the Receivership Entities. Such locations include, but are not limited to, 78 John Miller Way, #2111, Kearney, NJ, and 2011 8th St., North Bergen, NJ; and any offsite location or commercial mailbox used by the Receivership Entities. The Receiver may exclude Defendants, Receivership Entities, and their employees from the business premises during the immediate access;
- B. Plaintiff and the Receiver, and their representatives, agents, contractors, and assistants, are authorized to remove Documents from the Receivership Entities' premises in order that they may be inspected, inventoried, and copied. Plaintiff shall return any removed materials to the Receiver within five (5) business days of completing inventorying and copying, or such time as is agreed upon by Plaintiff and the Receiver;

- C. Plaintiff's access to the Receivership Entities' documents pursuant to this Section shall not provide grounds for any Defendant to object to any subsequent request for documents served by Plaintiff;
- D. Plaintiff and the Receiver, and their representatives, agents, contractors, and assistants, are authorized to obtain the assistance of federal, state, and local law enforcement officers as they deem necessary to effect service and to implement peacefully the provisions of this Order;
- E. If any Documents, computers, or electronic storage devices containing information related to the business practices or finances of the Receivership Entities are at a location other than those listed herein, including personal residence(s) of any Defendant, then, immediately upon receiving notice of this order, Defendants and Receivership Entities shall produce to the Receiver all such Documents, computers, and electronic storage devices, along with any codes or passwords needed for access. In order to prevent the destruction of computer data, upon service of this Order, any such computers or electronic storage devices shall be powered down in the normal course of the operating system used on such devices and shall not be powered up or used until produced for copying and inspection; and
- F. If any communications or records of any Receivership Entity are stored with an Electronic Data Host, such Receivership Entity shall, immediately upon receiving notice of this order, provide the Receiver with the username, passwords, and any other login credential needed to access the communications and records, and shall not attempt to access, or cause a third-party to attempt to access, the communications or records.

XXII. DISTRIBUTION OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that Defendants shall immediately provide a copy of this Order to each affiliate, telemarketer, marketer, sales entity, successor, assign, member, officer,

director, employee, agent, independent contractor, client, attorney, spouse, subsidiary, division, and representative of any Defendant, and shall, within ten (10) days from the date of entry of this Order, provide Plaintiff and the Receiver with a sworn statement that this provision of the Order has been satisfied, which statement shall include the names, physical addresses, phone number, and email addresses of each such person or entity who received a copy of the Order.

Furthermore, Defendants shall not take any action that would encourage officers, agents, members, directors, employees, salespersons, independent contractors, attorneys, subsidiaries, affiliates, successors, assigns, or other persons or entities in active concert or participation with

XXIII. EXPEDITED DISCOVERY

them to disregard this Order or believe that they are not bound by its provisions.

IT IS FURTHER ORDERED that, notwithstanding the provisions of the Fed. R. Civ. P. 26(d) and (f) and 30(a)(2)(A)(iii), and pursuant to Fed. R. Civ. P. 30(a), 33, 34, and 45, Plaintiff and the Receiver are granted leave, at any time after service of this Order, to conduct limited expedited discovery for the purpose of discovering: (1) the nature, location, status, and extent of Defendants' Assets; (2) the nature, location, and extent of Defendants' business transactions and operations; (3) Documents reflecting Defendants' business transactions and operations; or (4) compliance with this Order. The limited expedited discovery set forth in this Section shall proceed as follows:

A. Plaintiff and the Receiver may take the deposition of parties and non-parties. Forty-eight (48) hours' notice shall be sufficient notice for such depositions. The limitations and conditions set forth in Rules 30(a)(2)(A) and 31(a)(2)(A) of the Federal Rules of Civil Procedure regarding subsequent depositions of an individual shall not apply to depositions taken pursuant to this Section. Any such deposition taken pursuant to this Section shall not be counted towards

the deposition limit set forth in Rules 30(a)(2)(A) and 31(a)(2)(A), and depositions may be taken by telephone or other remote electronic means;

- B. Plaintiff and the Receiver may serve upon parties requests for production of Documents or inspection that require production or inspection within five (5) days of service, provided, however, that three (3) days of notice shall be deemed sufficient for the production of any such Documents that are maintained or stored only in an electronic format;
- C. Plaintiff and the Receiver may serve upon parties interrogatories that require response within five (5) days after Plaintiff serves such interrogatories;
- D. Plaintiff and the Receiver may serve subpoenas upon non-parties that direct production or inspection within five (5) days of service;
- E. Service of discovery upon a party to this action, taken pursuant to this Section, shall be sufficient if made by facsimile, email, or by overnight delivery;
- F. Any expedited discovery taken pursuant to this Section is in addition to, and is not subject to, the limits on discovery set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court. The expedited discovery permitted by this Section does not require a meeting or conference of the parties, pursuant to Rules 26(d) and (f) of the Federal Rules of Civil Procedure;
- G. The Parties are exempted from making initial disclosures under Fed. R. Civ. Procedure 26(a)(1) until further order of this Court.

XXIV. SERVICE OF THIS ORDER

IT IS FURTHER ORDERED that copies of this Order as well as the Application for Temporary Restraining Order and all other pleadings, Documents, and exhibits filed contemporaneously with that Application (other than the complaint and summons), may be served by any means, including facsimile transmission, email, or other electronic messaging,

personal or overnight delivery, U.S. Mail or FedEx, by agents and employees of Plaintiff, by any law enforcement agency, or by private process server, upon any Defendant, or any person (including any financial institution) that may have possession, custody, or control of any Asset or Document of any Defendant, or that may be subject to any provision of this Order pursuant to Rule 65(d)(2) of the Federal Rules of Civil Procedure. For purposes of this Section, service upon any branch, subsidiary, affiliate, or office of any entity shall effect service upon the entire entity.

XXV. CORRESPONDENCE AND SERVICE ON PLAINTIFF

IT IS FURTHER ORDERED that, for the purpose of this Order, all correspondence and service of pleadings on Plaintiff shall be addressed via email to Frances Kern (fkern@ftc.gov) and Colleen Robbins (crobbins@ftc.gov).

XXVI. PRELIMINARY INJUNCTION HEARING

appear before this Court on the 17th day of June , 2024, at 9:30 a.m., to show cause, if there is any, why this Court should not enter a preliminary injunction, pending final ruling on the Complaint against Defendants, enjoining the violations of the law alleged in the Complaint, continuing the freeze of their Assets, continuing the receivership, and imposing such additional relief as may be appropriate.

XXVII. BRIEFS AND AFFIDAVITS CONCERNING PRELIMINARY INJUNCTION

IT IS FURTHER ORDERED that:

A. Defendants shall file with the Court and serve on Plaintiff's counsel any answering pleadings, affidavits, motions, expert reports or declarations, or legal memoranda no later than four (4) days prior to the order to show cause hearing scheduled pursuant to this Order. Plaintiff may file responsive or supplemental pleadings, materials, affidavits, or memoranda with

the Court and serve the same on counsel for Defendants no later than one (1) day prior to the order to show Cause hearing. Provided that such affidavits, pleadings, motions, expert reports, declarations, legal memoranda, or oppositions must be served by personal or overnight delivery, facsimile, or email, and be received by the other party or parties no later than 5:00 p.m. (Eastern) on the appropriate dates set forth in this Section.

B. An evidentiary hearing on Plaintiff's request for a preliminary injunction is not necessary unless Defendants demonstrate that they have, and intend to introduce, evidence that raises a genuine and material factual issue. The question of whether this Court should enter a preliminary injunction shall be resolved on the pleadings, declarations, exhibits, and memoranda filed by, and oral argument of, the parties. Live testimony shall be heard only on further order of this Court. Any motion to permit such testimony shall be filed with the Court and served on counsel for the other parties at least five (5) days prior to the preliminary injunction hearing in this matter. Such motion shall set forth the name, address, and telephone number of each proposed witness, a detailed summary or affidavit revealing the substance of each proposed witness's expected testimony, and an explanation of why the taking of live testimony would be helpful to this Court. Any papers opposing a timely motion to present live testimony or to present live testimony in response to another party's timely motion to present live testimony shall be filed with this Court and served on the other parties at least three (3) days prior to the order to show cause hearing.

Provided, however, that service shall be performed by personal or overnight delivery, facsimile, or email, and Documents shall be delivered so that they shall be received by the other parties no later than 5:00 p.m. (Eastern) on the appropriate dates provided in this Section.

XXVIII. DURATION OF THE ORDER

IT IS FURTHER ORDERED that this Order shall expire fourteen (14) days from the date of entry noted below, unless within such time, the Order is extended for an additional period pursuant to Fed. R. Civ. P. 65(b)(2).

IT IS FURTHER ORDERED that Defendants may move to dissolve or modify the Temporary Restraints on two (2) days advance notice to Plaintiff and the Court.

XXIX. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

SO ORDERED, this 3rd day of June, 2024, at 12:20 p.m.

JULAEN XAVIER NEALS Upited States District Judge

FEDERAL TRADE COMMISSION

FINANCIAL STATEMENT OF INDIVIDUAL DEFENDANT

Definitions and Instructions:

- 1. Complete all items. Enter "None" or "N/A" ("Not Applicable") in the first field only of any item that does not apply to you. If you cannot fully answer a question, explain why.
- "Dependents" include your spouse, live-in companion, dependent children, or any other person, whom you or your spouse (or your children's other parent) claimed or could have claimed as a dependent for tax purposes at any time during the past five years.
- 3. "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or any foreign country or territory, whether held individually or jointly and whether held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.
- 4. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number(s) being continued.
- 5. Type or print legibly.
- 6. Initial each page in the space provided in the lower right corner.
- 7. Sign and date the completed financial statement on the last page.

Penalty for False Information:

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

- (1) "in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or devise a material fact; makes any materially false, fictitious or fraudulent statement or representation; or makes or uses any false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);
- (2) "in any . . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or
- (3) "in any (... statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information . . . knowing the same to contain any false material declaration" (18 U.S.C. § 1623).

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

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BACKGROUN	ID INFORMATIO	N		
Item 1. Information About You				
Full Name	Social Security No.			
Current Address of Primary Residence	Driver's License No. State Issued		State Issued	
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	Phone Numbers Home: ()	Date of Birth: / / (mm/dd/yy	уу)	
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☐Rent ☐Own From (Date): / / (mm/dd/yyyy)	E-Mail Address			
Internet Home Page				
Previous Addresses for past five years (if required, use additional	I pages at end of form)			
Address		From: / / Until: / / (mm/dd/yyyy) (mm/dd/yyyy)		
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apouse/Companion's Name	Social Security No.	/ / (mm/dd/yyyy)		
Address (if different from yours)	Phone Number	Place of Birth		
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Identify any other name(s) and/or social security number(s) you have use	d, and the time period(s) d	(mm/dd/yyyy uring which they were used:	/)	
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Employer's Name and Address	Job Title			
	Years in Present Job	Annual Gross Salary/Wages \$		
Item 3. Information About Your Previous Spouse				
Name and Address		Social Security No.		
		Date of Birth		
		(mm/dd/yyyy)		
Item 4. Contact Information (name and address of closest living	relative other than your s	oouse)		
Name and Address		Phone Number		
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Item 5. Information About Dependents (whether	ner or not		- 1, 17 11.1	Pala de Designataria de la	
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		Relationship)		
Name and Address		Social Secu	rily No.	Date of Birth	
				(mm/dd/yyyy)	
		Relationship	•		
Item 6. Employment Information/Employment I Provide the following information for this year-to-date and for ear officer, member, partner, employee (including self-employment) period. "Income" includes, but is not limited to, any salary, com royalties, and benefits for which you did not pay (e.g., health inson your behalf.	ach of the), agent, or imissions.	wner, shareho distributions	older, contractor, partici draws, consulting fees,	pant or consultant at al loans, loan payments,	ny time during that dividends.
Company Name and Address		Dates E	mployed	Income Received: Y	-T-D & 5 Prior Yrs.
	From (N	/lonth/Year)	To (Month/Year)	Year	Income
Ownership Interest? ☐ Yes ☐ No		1	1	20	\$ \$
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Caption of Proceeding	Court or Agency and Location	Case No.	Nature of Proceeding	Relief Requested	Status or Disposition

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st all safe deposit boxes. located	within the United States or in any foreign	n country or terri efit of you, your :	tory, whether held ind spouse, or any of you	ividually or jointly and who dependents.	ther held by
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ou, your spouse, or any of your de	within the United States or in any foreig ependents, or held by others for the ben	efit of you, your	spouse, or any of you	dependents.	

FINANCIAL INFORMATION REMINDER: When an item asks for information regarding your "assets" and "liabilities" include ALL assets and liabilities, located we the United States or in any foreign country or territory, or institution, whether held individually or jointly, and whether held by you, you spouse, or any of your dependents, or held by others for the benefit of you, your spouse, or any of your dependents. In addition, provable all documents requested in Item 24 with your completed Financial Statement.									
	A	ASSETS							
Item 9. Cash, Bank, and Mor List cash on hand (as opposed to cash accounts, including but not limited to c limited to cash in the form of currency,	n in bank accounts or other financ hecking accounts, savings accou	nts, and certificates of	ink accoun deposit. Ti	ts, money ne term "ca	market accor ash on hand"	unts, or other financial includes but is not			
a. Amount of Cash on Hand \$	-	Form of Cash on Hand							
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Item 10. Publicly Traded Sec List all publicly traded securities, include but not limited to treasury bills and trea	ding but not limited to, stocks, stock	ck options, corporate b ipal bonds. Also list ar	onds, mutu ny U.S. sav	ial funds, l ings bonds	J.S. governm s.	ent securities (including			
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Broker House, Address		Broker Account	No.						
		Current Fair Ma	rket Value		Loan(s) Ag	gainst Security			
Owner of Security		Issuer		Type of	Security	No. of Units Owned			
Broker House, Address	-	Broker Account	No.	<u> </u>					
		Current Fair Ma	rket Value		Loan(s) Ag	gainst Security			
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		Current Fair Ma \$	rket Value		Loan(s) Ag \$	gainst Security			

Initials: __

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Item 11. Non-Public Business and Fin List all non-public business and financial interests, liability corporation ("LLC"), general or limited parti- corporation, and oil or mineral lease.	including but r	not limited to	any interest in a no proprietorship, inter	on-public national i	corporation, s business corpo	ubchapter-S oration or pe	s corporation, limited ersonal investment	
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Item 12. Amounts Owed to You, Your					14 14 17 18 18 41 14 14 14			
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	Current Amo	unt Owed	Payment Schedule \$			an bory		
Debtor's Telephone	Debtor's Relationship to You							
Item 13. Life Insurance Policies List all life insurance policies (including endowmen	t policies) with	any cash su	ırrender value.					
Insurance Company's Name, Address, & Telephor		Beneficiary			Policy No.		Face Value \$	
		Insured			Loans Against Policy \$		Surrender Value \$	
Insurance Company's Name, Address, & Telephor	ne No.	Beneficiary			Policy No.		Face Value \$	
	Insured		***************************************	Loans Against Policy \$		Surrender Value \$		
Item 14. Deferred Income Arrangeme List all deferred income arrangements, including b other retirement accounts, and college savings pla	ut not limited to	o, deferred a	nnuities, pensions p	olans, pro	ofit-sharing pla	ns, 401(k) p	lans, IRAs, Keoghs,	
Trustee or Administrator's Name, Address & Telep	hone No.		Name on Account			Account N	O.	
			Date Established	Туре	of Plan		der Value before and Penalties	
Trustee or Administrator's Name, Address & Telep	bone No		(mm/dd/yyyy) Name on Account			\$ Account N	ο.	
Tradice of Administrator & Humo, Addices & Foley			Date Established		of Plan	Surren Taxes	der Value before and Penalties	
						\$		

Initials:

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Item 15. Pe	nding Ins	urance Payments or Inheri	tances ou,				
Туре				Amount E	xpected [Pate Expected (mm/dd/yyyy)	
-71				\$	•	1 1	
				\$		1 1	
				\$		1 1	
Item 16. Vel		cles, boats, airplanes, and other vel	nicles.				
Vehicle Type	Year	Registered Owner's Name	Purchase Price			Current Balance	
Make		Registration State & No.	Account/Loan No.	Current \	√alue	Monthly Payment \$	
Model		Address of Vehicle's Location	Lender's Name and Addi	ess			
Vehicle Type	Year	Registered Owner's Name	Purchase Price	Original \$	Loan Amount	Current Balance \$	
Make	<u> </u>	Registration State & No.	Account/Loan No.	Current \	√alue	Monthly Payment	
Model Address of Vehicle's Location Lender's Name and Address					Ψ		
Vehicle Type	Year	Registered Owner's Name	Purchase Price	Original Loan	Amount	Current Balance	
Make		Registration State & No.	Account/Loan No.	Current Value	3	Monthly Payment	
Model		Address of Vehicle's Location	Lender's Name and Addr	Lender's Name and Address		Ţ	
Vehicle Type	Year	Registered Owner's Name	Purchase Price \$	Original Loan \$	Amount	Current Balance	
Make		Registration State & No.	Account/Loan No.	Current Value)	Monthly Payment	
Model		Address of Vehicle's Location	Lender's Name and Addr	ess		\$	
List all other per	sonal proper	nal Property ty not listed in Items 9-16 by catego work, gemstones, jewelry, bullion, ot	ory, whether held for personal her collectibles, copyrights, pa	use, investment o Itents, and other in	r any other rea ntellectual pro	ason, including but not perty.	
Property Category (e.g., artwork, jewelry) Name of Owner		Property Location	วก	Acquisition (Cost Current Value		
					\$	\$	
					\$	\$	
			***************************************		\$	\$	

Ini	tia	ls:	

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Item 18. Real Property						
List all real property interests (including Property's Location	ng any land contract) Type of Property	Namo(e) on Title or Contrac	e(s) on Title or Contract and Ownership Percentages			
Property's Location	Type of Froperty		Name(s) on Title of Contrac	a and Ownership	reicemages	
riogolotton bato (minioary)	Purchase Price	Cu S	irrent Value	Basis of Valuati	on	
Lender's Name and Address		an or Accour	it No.	Contract	e On First Mortgage or	
				\$ Monthly Payme	nt	
Other Mortgage Loan(s) (describe)		Monthly Pa	ayment	☐ Rental Unit		
		\$ Current Ba	alance	Monthly Rent R	ecelved	
		\$	1	\$		
Property's Location	Type of Property		Name(s) on Title or Contrac	t and Ownership	Percentages	
Acquisition Date (mm/dd/yyyy)	 Purchase Price	Cu	l rrent Value	Basis of Valuati	on	
/ / s Lender's Name and Address		s an or Accoun	t No.	Current Balance	e On First Mortgage or	
relidel 2 Maille and Address	Loc	all of Accoun	1140,	Contract	: Off First Wortgage of	
				\$ Monthly Payme	nf	
				\$	11(
Other Mortgage Loan(s) (describe)		Monthly Payment \$ Current Balance		☐ Rental Unit Monthly Rent Received		
		\$		\$		
		LIABI	LITIES			
Item 19. Credit Cards List each credit card account held by whether issued by a United States or	you, your spouse, or your foreign financial institutior	dependents,	and any other credit cards that	at you, your spous	e, or your dependents use,	
Name of Credit Card (e.g., Visa, MasterCard, Department Store)	Account No.		Name(s) on Acc	ount	Current Balance	
					\$	
					\$	
					\$	
					\$	
Item 20. Taxes Payable List all taxes, such as income taxes o	r real estate taxes, owed t	by you, your	spouse, or your dependents,			
Type of Tax	ζ		Amount Owed		Year Incurred	
		\$				
		\$				
		\$				

Initials:		Į	lni	tia	s:	
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Item 21. Other Amounts Ov List all other amounts, not listed else								lents.	
Lender/Creditor's Name, Address, and Telephone No.			Nature of De number)	ebt (if th	e resu	llt of a court judg	ment or settl	ement, pro	ovide court name and docket
			Lender/Cred	ditor's R	elatior	nship to You			
Date Liability Was Incurred	1 1		Owed Current Amount Owed \$			Payment Schedule			
(mm/dd/yyyy) Lender/Creditor's Name, Address, ar	e No.	number)	Nature of Debt (if the result of a court judgment or settlement, provide court name and docket						
			Lender/Cred	ditor's R	elatior	nship to You			
Date Liability Was Incurred / / (mm/dd/yyyy)	Original A	mount	Owed		Curre \$	ent Amount Owe	d	Paymen	t Schedule
		ОТ	HER FINA	ANCIA	LIN	IFORMATIC	N		
Item 22. Trusts and Escrow List all funds and other assets that ar retainers being held on your behalf by dependents, for any person or entity.	e beina hel	d in trus isel. Al:	t or escrow by so list all fund	y any pe Is or othe	rson (er ass	or entity for you, ets that are being	your spouse g held in trus	or your d t or escrov	ependents. Include any legal w by you, your spouse, or your
Frietaa or Hecrowi Adant'e Nama X. Addrage I		te Established mm/dd/yyyy)		rantor Beneficiaries		laries	Present Market Value of Assets*		
		1	/		***************************************			(\$	
4. 4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.		1	/					\$	
		ſ	1					\$	
*If the market value of any asset is ur	nknown, de	scribe th	ne asset and s	state its	cost, i	f you know it.			
Item 23. Transfers of Asset List each person or entity to whom yo loan, gift, sale, or other transfer (exclu- entity, state the total amount transfer	s ou have tran ude ordinar	sferred and ne	in the aggree	gate, mo	ore tha	ın \$5,000 in fund	s or other as to unrelated	sets durin third parti	g the previous five years by es). For each such person or
Transferee's Name, Address, & Rela	ransferee's Name, Address, & Relationship Pro		perty Transfe	rred	Agg	regate Value*	Transfer (mm/dd/		Type of Transfer (e.g., Loan, Gift)
					\$		/ /		
					\$		1 1		
					\$		/ /		
*If the market value of any asset is ur	nknown, de:	scribe th	ne asset and s	state its	cost, i	f you know it.			

Initials: __

			100						
	Occument Requests so of the following documents with your c	ompleted	Financial Statement.						
	Federal tax returns filed during the	e last thr	ree years by or on behalf of you, your spouse, or your depender	nts.					
	All applications for bank loans or other extensions of credit (other than credit cards) that you, your spouse, or your dependents have submitted within the last two years, including by obtaining copies from lenders if necessary.								
Item 9	For each bank account listed in I	in Item 9, all account statements for the past 3 years.							
7(4) (1990, 1990) (1990) 10			provide (including by causing to be generated from accounting	records) the					
item 11	most recent balance sheet, tax return, annual income statement, the most recent year-to-date income statem general ledger files from account records.								
Item 17		e been prepared for any property listed in Item 17, including appraisals done for insurance xclude any category of property where the total appraised value of all property in that category is							
Item 18	All appraisals that have been pre	pared for	d for real property listed in Item 18.						
ltem 21	Documentation for all debts listed								
Item 22	All executed documents for any trust or escrow listed in Item 22. Also provide any appraisals, including insurance appraisals that have been done for any assets held by any such trust or in any such escrow.								
	SUN	IMAR	/ FINANCIAL SCHEDULES						
ltem 25. C	Combined Balance Sheet for Yo	u, You	r Spouse, and Your Dependents						
Assets			Liabilities						
Cash on Hand	d (Item 9)	\$	Loans Against Publicly Traded Securities (Item 10)	\$					
unds Held ir	n Financial Institutions (Item 9)	\$	Vehicles - Liens (Item 16)	\$					
J.S. Governn	nent Securities (Item 10)	\$	Real Property – Encumbrances (Item 18)	\$					
Publicly Trade	ed Securities (Item 10)	\$	Credit Cards (Item 19)	\$					
Von-Public B	usiness and Financial Interests (Item 11)	\$	Taxes Payable (Item 20)	\$					
Amounts Owe	ed to You (Item 12)	\$	Amounts Owed by You (Item 21)	\$					
ife Insurance	e Policies (Item 13)	\$	Other Liabilities (Itemize)						
Deferred Inco	me Arrangements (Item 14)	\$		\$					
Vehicles (Iten	n 16)	\$		\$					
Other Person	al Property (Item 17)	\$		\$					
Real Property	/ (Item 18)	\$		\$					
Other Assets	s (Itemize)			\$					
		\$		\$					
		\$		\$					
		\$		\$					
	Total Assets	\$	Total Liabilities	\$					
Provide the cuinclude credit		you, your	d Expenses for You, Your Spouse, and Your Depende spouse, and your dependents. Do not include credit card payments sep Expenses						
Salary - After	Taxes	\$	Mortgage or Rental Payments for Residence(s)	\$					
Source:	enione and Daystites	~	Proporty Toyon for Decidence (s)	-					
	ssions, and Royalties	\$	Property Taxes for Residence(s)	\$					
Source: Interest			Rental Property Expenses, Including Mortgage Payments, Taxes,						
Source:		\$	and Insurance	\$					
	d Capital Gains	\$	Car or Other Vehicle Lease or Loan Payments	\$					
Source: Gross Rental	Income		Food Expenses						
Source:	moonto.	\$	To a Emporitor	\$					
Profits from S Source:	iole Proprietorships	\$	Clothing Expenses	\$					
Distributions f and LLCs	from Partnerships, S-Corporations,	\$	Utilities	\$					

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Source:

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	ncome a	and Expenses for You, Your Spouse, and Your Dep	endents (cont.)
Distributions from Trusts and Estates	\$	Medical Expenses, Including Insurance	\$
Source: Distributions from Deferred Income Arrangements	<u> </u>	Other Insurance Premiums	T
Source:	\$	Other medianes i fernance	\$
Social Security Payments	\$	Other Transportation Expenses	\$
Alimony/Child Support Received	\$	Other Expenses (Itemize)	
Gambling Income	\$		\$
Other Income (Itemize)			\$
	\$		\$
	\$		\$
	\$		\$
Total incom	e \$	Total Expenses	\$
		ATTACHMENTS	
Item 27. Documents Attached to this List all documents that are being submitted with thi		al Statement statement. For any Item 24 documents that are not attached, explai	in why.
Item No. Document Relates To		Description of Document	
	· ·		
			
4 . 560 - 61 - 65		20. 40	and a seed Property
Commission or a federal court. I have us responses I have provided to the items a notice or knowledge. I have provided all penalties for false statements under 18 U	sed my b bove are requeste J.S.C. §	with the understanding that it may affect action by the Frest efforts to obtain the information requested in this start and contain all the requested facts and information documents in my custody, possession, or control. I 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five yearlier the laws of the United States that the foregoing is	tatement. The on of which I have know of the ars imprisonment
Executed on:			
(Date)		Signature	

FEDERAL TRADE COMMISSION

FINANCIAL STATEMENT OF CORPORATE DEFENDANT

Instructions:

- 1. Complete all items. Enter "None" or "N/A" ("Not Applicable") where appropriate. If you cannot fully answer a question, explain why.
- 2. The font size within each field will adjust automatically as you type to accommodate longer responses.
- 3. In completing this financial statement, "the corporation" refers not only to this corporation but also to each of its predecessors that are not named defendants in this action.
- 4. When an Item asks for information about assets or liabilities "held by the corporation," include <u>ALL</u> such assets and liabilities, located within the United States or elsewhere, held by the corporation or held by others for the benefit of the corporation.
- 5. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number being continued.
- 6. Type or print legibly.
- 7. An officer of the corporation must sign and date the completed financial statement on the last page and initial each page in the space provided in the lower right corner.

Penalty for False Information:

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

- (1) "in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing the same to contain any false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);
- (2) "in any . . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or
- (3) "in any (... statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information . . . knowing the same to contain any false material declaration." (18 U.S.C. § 1623)

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

BACKGROUND INFORMATION

Item 1.	General Information		
Corporation	's Full Name		
Primary Bus	siness Address		From (Date)
Telephone 1	No	Fax No.	
E-Mail Add	ress	Internet Home Page	
All other cu	rrent addresses & previous addres	ses for past five years, including	g post office boxes and mail drops:
Address			From/Until
Address			From/Until
Address			From/Until
All predeces	ssor companies for past five years:	:	
Name & Ad	dress		From/Until
Name & Ad	dress		From/Until
Name & Ad	dress	· 	From/Until
Item 2.	Legal Information		
Federal Tax	payer ID No	State & Date of Inco	orporation
State Tax ID) No Sta	nte Profit or	· Not For Profit
Corporation	's Present Status: Active	Inactive	Dissolved If
Dissolved:	Date dissolved	By Whom	
Reasons			
Fiscal Year-	End (Mo./Day)	Corporation's Business Activ	vities
Item 3.	Registered Agent		
Name of Re	gistered Agent		
Address			Telephone No.

Page 2

<u>Item 4.</u>	Principal Stockholders		
List all perso	ons and entities that own at least 5% of the corporation's stock.		
	Name & Address		% Owned
Item 5.	Board Members		
List all meml	bers of the corporation's Board of Directors.		
	Name & Address % Ov	wned Te	erm (From/Until)
		·	
<u>Item 6.</u>	Officers		
	corporation's officers, including <i>de facto</i> officers (individuals with significant lo not reflect the nature of their positions).	managem	ent responsibility
	Name & Address		% Owned
	·		

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Item 7.	Businesses Rela	nted to the Corporation				
List all corpor	rations, partnership	s, and other business entition	es in which this co	orporation has an	ownership inte	erest.
		Name & Address		Busin	ess Activities	% Owned
		if any, has ever transacted				
Item 8.	Businesses Rela	nted to Individuals				
		s, and other business entiti dividuals listed in Items 4 -				ers, board
<u>Individual's</u>	<u>Name</u>	Business Name &	Address	Busine	ss Activities	% Owned
						<u></u>
						
		if any, have ever transacted				
Item 9.	Related Individ	uals				
years and curre	ent fiscal year-to-c	whom the corporation has hate. A "related individual" d officers (i.e., the individual	' is a spouse, sibli	ng, parent, or chil		
	Name	and Address	<u>R</u>	elationship	Business A	ctivities
				-		

Page 4

Item 10. Outside	Accountants		
List all outside accountan	ats retained by the corporation dur	ring the last three years.	
<u>Name</u>	Firm Name	Address	CPA/PA?
Item 11. Corpora	tion's Recordkeeping		
List all individuals within the last three years.	the corporation with responsibil	ity for keeping the corporation's finan	icial books and records for
	Name, Address, & Telephone	Number	Position(s) Held
Item 12. Attorney	78		
List all attorneys retained	by the corporation during the las	at three years.	
<u>Name</u>	<u>Firm Name</u>	<u>Address</u>	
		-,	

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Item 13. Pending Lawsuits Filed by the Corporation

List all pending lawsuits that have been filed by the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments or settlements in favor of the corporation in Item 25).

Opposing Party's Nan	ne & Address		
Court's Name & Addi	'ess		
Docket No.	Relief Requested	Nature of Lawsuit	
	Status		•
		Nature of Lawsuit	
		Nature of Lawsuit	
	ess		
		Nature of Lawsuit	
	ress		
	Relief Requested		
	ne & Address		
Court's Name & Addr	ess		
Docket No	Relief Requested	Nature of Lawsuit	
	Status		

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<u>Item 14.</u> Current Lawsuits Filed Against the Corporation

List all pending lawsuits that have been filed against the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments, settlements, or orders in Items 26 - 27). Opposing Party's Name & Address Court's Name & Address Docket No. Relief Requested Nature of Lawsuit Status Opposing Party's Name & Address Court's Name & Address Docket No. _____ Relief Requested _____ Nature of Lawsuit ____ Status Opposing Party's Name & Address Court's Name & Address Docket No. Relief Requested Nature of Lawsuit_ Status Opposing Party's Name & Address Court's Name & Address Docket No. _____ Relief Requested _____ Nature of Lawsuit _____ Status Opposing Party's Name & Address Court's Name & Address Docket No. Relief Requested Nature of Lawsuit Status Opposing Party's Name & Address Court's Name & Address Docket No. Relief Requested Nature of Lawsuit

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Initials

Status

<u>Item 15.</u>	Bankrup	tcy Informat	ion					
List all state i	nsolvency ar	ıd federal ban	kruptcy proc	eedings in	wolving the	e corporat	ion,	
Commenceme	ent Date		Termina	tion Date	,		Docket No.	
If State Court	: Court & Co	ounty		I	f Federal C	ourt: Dist	rict	
Disposition _								
Item 16.	S	afe Deposit B	Soxes					
List all safe do							he corporation, or held by o	others for the
Owner's Nam	<u>ne</u> <u>N</u>	ame & Addre	ss of Deposi	tory Institu	<u>ation</u>			Box No.
			<u>FINAN</u>	CIAL IN	FORMAT	<u>ION</u>		
	sets and liab	ilities, locate	d within the				neld by the corporation," held by the corporation o	
<u>Item 17.</u>	Tax Retu	rns						
List all federa	l and state co	orporate tax re	eturns filed fo	or the last	three comp	lete fiscal	years. Attach copies of all	l returns.
Federal/ State/Both	Tax Year	Tax Due Federal	<u>Tax Paid</u> <u>Federal</u>	<u>Tax I</u> <u>Sta</u>		x Paid State	Preparer's Name	
		\$. \$	\$	\$			
		\$. \$. \$	\$.
		\$	\$	\$	\$			

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tem 18.	Fmancia	1 Statements					
		its that were prepared fo h copies of all statement				rs and for tl	ne current
Year	Balance She	et Profit & Loss State	<u>ment</u>	Cash Flow Statement	Changes in Owne	er's Equity	Audited?
					-		
<u>item 19.</u>	Financia	l Summary					
	profit and loss	complete fiscal years an statement in accordance					
		Current Year-to-Date		1 Year Ago	2 Years Ago	3 Yea	urs Ago
Gross Rev	<u>renue</u>	\$	\$	\$		\$	
<u>Expenses</u>		\$	\$_	\$,	\$	
Net Profit	After Taxes	\$	\$			\$	
<u>Payables</u>		\$					
Receivabl	<u>es</u>	\$					
tem 20.	Cash, Ba	nk, and Money Marke	t Acc	ounts			
		money market accounted by the corporation. The					ccounts, and
Cash on Ha	nd \$	C	ash H	eld for the Corporation'	s Benefit \$		
Name &		inancial Institution		Signator(s) on Account	Account		Current Balance
						\$\$	
						\$	
	····					\$	

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Item 21. Government Obligations and Publicly Traded Securities

List all U.S. Government obligations, including but not limited to, savings bonds, treasury bills, or treasury notes, held by the corporation. Also list all publicly traded securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by the corporation.

Issuer	Type of Security/0	Obligation
No. of Units Owned	_ Current Fair Market Value \$	Maturity Date
Issuer	Type of Security/0	Obligation
No. of Units Owned	_ Current Fair Market Value \$	Maturity Date
Item 22. Real Estate		
List all real estate, including lea	seholds in excess of five years, hel-	d by the corporation.
Type of Property	Property	's Location
Name(s) on Title and Ownership	o Percentages	
Current Value \$	Loan or Account No.	
Lender's Name and Address		
Current Balance On First Mortg	age \$ Monthly I	Payment \$
Other Loan(s) (describe)		Current Balance \$
Monthly Payment \$	Rental Unit?	Monthly Rent Received \$
Type of Property	Property	's Location
Name(s) on Title and Ownership	Percentages	
Current Value \$	Loan or Account No.	
Lender's Name and Address		
	age \$ Monthly I	
Other Loan(s) (describe)		Current Balance \$
Monthly Payment \$	Rental Unit?	Monthly Rent Received \$

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Item 23. Other Assets

List all other property, by category, with an estimated value of \$2,500 or more, held by the corporation, including but not limited to, inventory, machinery, equipment, furniture, vehicles, customer lists, computer software, patents, and other intellectual property.

Property Category	Property Location	Acquisition Cost	<u>Current</u> <u>Value</u>
		\$	\$
		\$	\$
		\$	\$
		\$	\$
		\$	\$
		\$	\$
		.\$	\$
		\$	\$
		\$	\$

Item 24. Trusts and Escrows

List all persons and other entities holding funds or other assets that are in escrow or in trust for the corporation.

Trustee or Escrow Agent's Name & Address	Description and Location of Assets	<u>Present Market</u> Value of Assets
		<u>\$</u> \$
		\$\$
		\$
		\$
		\$
		\$
		\$

Page 11

Monetary Judgments and Settlements Owed To the Corporation Item 25. List all monetary judgments and settlements, recorded and unrecorded, owed to the corporation. Opposing Party's Name & Address Court's Name & Address Docket No. Nature of Lawsuit _____ Date of Judgment _____ Amount \$____ Opposing Party's Name & Address Court's Name & Address Docket No. Nature of Lawsuit _____ Date of Judgment _____ Amount \$____ Item 26. Monetary Judgments and Settlements Owed By the Corporation List all monetary judgments and settlements, recorded and unrecorded, owed by the corporation. Opposing Party's Name & Address Court's Name & Address _____ Docket No.__ Nature of Lawsuit Date Amount \$_____ Opposing Party's Name & Address_____ Court's Name & Address Docket No. Nature of Lawsuit Date of Judgment Amount \$ Opposing Party's Name & Address____ Docket No. Court's Name & Address Date of Judgment Amount \$ Nature of Lawsuit Opposing Party's Name & Address Court's Name & Address Docket No. Nature of Lawsuit Date of Judgment Amount \$ Opposing Party's Name & Address Court's Name & Address Docket No. Nature of Lawsuit _____ Date of Judgment _____ Amount \$

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Item 27.	Government Orde	rs and Settlemer	nts		
List all existing	g orders and settlemen	nts between the co	orporation and a	any federal or state	e government entities.
Name of Agen	cy			Contact Person	1
Address					elephone No
Agreement Da	te1	Vature of Agreem	ent		
<u>Item 28.</u> List all of the c	Credit Cards	urds and store cha	irge accounts ar	nd the individuals	authorized to use them.
	me of Credit Card or		-		Isers and Positions Held
independent co fiscal years and consulting fees but are not limi	ntractors, and consul i current fiscal year-to , bonuses, dividends,	efits received from tants (other than to date. "Compendistributions, roy yments, rent, car	those individual sation" include valties, pensions	s listed in Items 5 es, but is not limite s, and profit sharir	at highly compensated employees, and 6 above), for the two previous ed to, salaries, commissions, ag plans. "Other benefits" include, ms, whether paid directly to the
Nan	ne/Position	Current Fiscal Year-to-Date	1 Year Ago	2 Years Ago	Compensation or Type of Benefits
		. \$	\$. \$	
		\$	\$	\$	
		\$	\$		
		.\$. \$		
		d)	Ф	Φ.	

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Item 30. Compensation of Board Members and Officers

List all compensation and other benefits received from the corporation by each person listed in Items 5 and 6, for the current fiscal year-to-date and the two previous fiscal years. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

Name/Position	Current Fisca Year-to-Date		2 Years Ago	Compensation or Type of Benefits
	\$	\$	\$	
	<u> </u>	\$	\$	
	\$	_ \$	\$	
	\$	\$\$	\$	
	\$	\$	\$	
	\$	\$	_\$	
	\$\$	\$\$	\$	
	\$	\$	\$	·

Item 31. Transfers of Assets Including Cash and Property

List all transfers of assets over \$2,500 made by the corporation, other than in the ordinary course of business, during the previous three years, by loan, gift, sale, or other transfer.

Transferee's Name, Address, & Relationship	<u>Property</u> <u>Transferred</u>	Aggregate <u>Value</u>	<u>Transfer</u> <u>Date</u>	Type of Transfer (e.g., Loan, Gift)
		\$	-	
		. \$	-	
		\$	•	
		_\$		
		\$\$		

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Initials

Item 32. Docum	nents Attached to the Financial Statement
List all documents that	are being submitted with the financial statement.
Item No. Document Relates To	Description of Document
7.	
Commission or a federa responses I have provid notice or knowledge. I penalties for false stater	It this financial statement with the understanding that it may affect action by the Federal Trade all court. I have used my best efforts to obtain the information requested in this statement. The ed to the items above are true and contain all the requested facts and information of which I have have provided all requested documents in my custody, possession, or control. I know of the ments under 18 U.S.C. § 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five years imprisonment under penalty of perjury under the laws of the United States that the foregoing is true and correct.
Executed on:	
(Date)	Signature
	Corporate Position

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Form 4506

(January 2024)

Department of the Treasury Internal Revenue Service

Request for Copy of Tax Return

▶ Do not sign this form unless all applicable lines have been completed.

► Request may be rejected if the form is incomplete or illegible.

Tip: Get faster service: Online at www.irs.gov, Get Your Tax Record (Get Transcript) or by calling 1-800-908-9946 for specialized assistance. We have teams available to assist. Note: Taxpayers may register to use <u>Get Transcript</u> to view, print, or download the following transcript types: Tax Return Transcript (shows most line items including Adjusted Gross Income (AGI) from your original Form 1040-series tax return as filed, along with any forms and schedules), Tax Account Transcript (shows basic data such as return type, marital status, AGI, taxable income and all payment types), Record of Account Transcript (combines the tax return and tax account transcripts into one complete transcript), Wage and Income Transcript

For more information about Form 4506, visit www.irs.gov/form4506.

OMB No. 1545-0429

	s data from information returns we receive such as Forms W-2, 1099, 1098 hat the IRS has no record of a filed Form 1040-series tax return for the year yo		f Non-filing Letter (provides			
1a	a Name shown on tax return. If a joint return, enter the name shown first. 1b First social security number on tax return, individual taxpayer identification number, or employer identification number (see instructions)					
2a	lf a joint return, enter spouse's name shown on tax return.	2b Second social security r taxpayer identification n				
3 (Current name, address (including apt., room, or suite no.), city, state, and ZIP c	ode (see instructions).				
4 F	Previous address shown on the last return filed if different from line 3 (see instru	uctions),				
5	f the tax return is to be mailed to a third party (such as a mortgage company), o	enter the third party's name, address,	and telephone number.			
Cautio	on: If the tax return is being sent to the third party, ensure that lines 5 through 7	7 are completed before signing, (see i	nstructions).			
6	Tax return requested. Form 1040, 1120, 941, etc. and all attachmen schedules, or amended returns. Copies of Forms 1040, 1040A, and 1040B destroyed by law. Other returns may be available for a longer period of t type of return, you must complete another Form 4506. ▶	EZ are generally available for 7 year	s from filing before they are			
	Note: If the copies must be certified for court or administrative proceedings,	check here				
7	Year or period requested. Enter the ending date of the tax year or period us	ing the mm/dd/yyyy format (see instr //	uctions).			
	/	/	//			
8	Fee. There is a \$30 fee for each return requested. Full payment must be in be rejected. Make your check or money order payable to "United States or EIN and "Form 4506 request" on your check or money order					
а	Cost for each return		\$ 30.00			
b	Number of returns requested on line 7					
c	Total cost. Multiply line 8a by line 8b		\$			
9 Coutio	If we cannot find the tax return, we will refund the fee. If the refund should go n: Do not sign this form unless all applicable lines have been complete	to the third party listed on line 5, che	ck nere , , , , , []			
Signatu request managi	are of taxpayer(s). I declare that I am either the taxpayer whose name is shown on red. If the request applies to a joint return, at least one spouse must sign. If signed by a member, guardian, tax matters partner, executor, receiver, administrator, trusted Form 4506 on behalf of the taxpayer. Note: This form must be received by IRS with	by a corporate officer, 1 percent or more b, or party other than the taxpayer, I cert hin 120 days of the signature date.	shareholder, partner, ify that I have the authority to			
	gnatory attests that he/she has read the attestation clause and up clares that he/she has the authority to sign the Form 4506. See in	1011 30 Teauring	number of taxpayer on line a			
	Signature (see instructions)	Date				
Sign	A manual designation of the second of the se					
Here	Print/Type name	Title (if line 1a above is a corporation,	partnership, estate, or trust)			
	Spouse's signature	Date				
	Print/Type name					

Form 4506 (Rev. 1-2024) Page 2

Section references are to the Internal Revenue Code unless otherwise noted.

Future Developments

For the latest information about Form 4506 and its instructions, go to www.irs.gov/form4506.

General Instructions

Caution: Do not sign this form unless all applicable lines, including lines 5 through 7, have been completed.

Designated Recipient Notification. Internal Revenue Code, Section 6103(c), limits disclosure and use of return information received pursuant to the taxpayer's consent and holds the recipient subject to penalties for any unauthorized access, other use, or redisclosure without the taxpayer's express permission or request.

Taxpayer Notification. Internal Revenue Code, Section 6103(c), limits disclosure and use of return information provided pursuant to your consent and holds the recipient subject to penalties, brought by private right of action, for any unauthorized access, other use, or redisclosure without your express permission or request.

Purpose of form. Use Form 4506 to request a copy of your tax return. You can also designate (on line 5) a third party to receive the tax return.

How long will it take? It may take up to 75 calendar days for us to process your request.

Where to file. Attach payment and mail Form 4506 to the address below for the state you lived in, or the state your business was in, when that return was filed. There are two address charts: one for individual returns (Form 1040 series) and one for all other returns.

If you are requesting a return for more than one year or period and the chart below shows two different addresses, send your request based on the address of your most recent return.

Chart for individual returns (Form 1040 series)

If you filed an individual return and lived in:

Mail to:

Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, a foreign country, American Samoa, Puerto Rico, Guam, the Commonwealth of the Northern Mariana Islands, the U.S. Virgin Islands, or A.P.O. or F.P.O. address

Internal Revenue Service RAIVS Team Stop 6716 AUSC Austin, TX 73301

Delaware, Illinols, Indiana, łowa, Kentucky, Maine, Massachusetts, Minnesota, Missouri, New Hampshire, New Jersey, New York, Vermont, Virginia, Wisconsin

internal Revenue Service RAIVS Team Stop 6705 S-2 Kansas City, MO 64999

Alaska, Arizona,
California, Colorado,
Connecticut, District of
Columbia, Haweii, Idaho,
Kansas, Maryland,
Michigan, Montana,
Nebraska, Nevada, New
Mexico, North Dakota,
Ohlo, Oregon,
Pennsylvania, Rhode
Island, South Dakota,
Utah, Washington, West
Virginia, Wyorning

Internal Revenue Service RAIVS Team P.O. Box 9941 Mail Stop 6734 Ogden, UT 84409

Chart for all other returns

For returns not in Form 1040 series, if the address on the return was in:

Mail to:

Connecticut, Delaware, District of Columbia, Georgia, Illinois, Indiana, Kentucky, Maine, Maryland, Massachusetts, Michigan, New Jersey, New York, North Carolina, Ohlo, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, West Virginia, Wisconsin

Internal Revenue Service RAIVS Team Stop 6705 S-2 Kansas City, MO 64999

Alabama, Alaska, Arizona, Arkansas California, Colorado, Florida, Hawaii, Idaho, lowa, Kansas, Louisiana, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, Wyoming, a foreign country, American Samoa, Puerto Rico, Guarn, the Commonwealth of the Northern Mariana Islands, the U.S. Virgin Islands, or A.P.O. or F.P.O. address

Internal Revenue Service RAIVS Team P.O. Box 9941 Mail Stop 6734 Ogden, UT 84409

Specific Instructions

Line 1b. Enter the social security number (SSN) or individual taxpayer identification number (ITIN) for the individual listed on line 1a, or enter the employer identification number (EIN) for the business listed on line 1a. For example, if you are requesting Form 1040 that includes Schedule C (Form 1040), enter your SSN.

Line 3. Enter your current address. If you use a P.O. box, please include it on this line 3.

Line 4. Enter the address shown on the last return filed if different from the address entered on line 3.

Note. If the addresses on lines 3 and 4 are different and you have not changed your address with the IRS, file Form 8822, Change of Address, or Form 8822-B, Change of Address or Responsible Party — Business, with Form 4506.

Line 7. Enter the end date of the tax year or period requested in mm/dd/yyyy format. This may be a calendar year, fiscal year or quarter. Enter each quarter requested for quarterly returns. Example: Enter 12/31/2018 for a calendar year 2018 Form 1040 return, or 03/31/2017 for a first quarter Form 941 return.

Signature and date. Form 4506 must be signed and dated by the taxpayer listed on line 1a or 2a. The IRS must receive Form 4506 within 120 days of the date signed by the taxpayer or it will be rejected. Ensure that all applicable lines, *including lines 5 through 7*, are completed before signing.



You must check the box in the signature area to acknowledge you have the authority to sign and request the information. The form will not be

processed and returned to you if the box is unchecked.

Individuals. Copies of jointly filed tax returns may be furnished to either spouse. Only one signature is required. Sign Form 4506 exactly as your name appeared on the original return. If you changed your name, also sign your current name.

Corporations. Generally, Form 4506 can be signed by: (1) an officer having legal authority to bind the corporation, (2) any person designated by the board of directors or other governing body, or (3) any officer or employee on written request by any principal officer and attested to by the secretary or other officer. A bona fide shareholder of record owning 1 percent or more of the outstanding stock of the corporation may submit a Form 4506 but must provide documentation to support the requester's right to receive the information.

Partnerships. Generally, Form 4506 can be signed by any person who was a member of the partnership during any part of the tax period requested on line 7.

All others. See section 6103(e) if the taxpayer has dled, is insolvent, is a dissolved corporation, or if a trustee, guardian, executor, receiver, or administrator is acting for the taxpayer.

Note: If you are Heir at law, Next of kin, or Beneficiary you must be able to establish a material interest in the estate or trust.

Documentation. For entitles other than individuals, you must attach the authorization document. For example, this could be the letter from the principal officer authorizing an employee of the corporation or the letters testamentary authorizing an individual to act for an estate.

Signature by a representative. A representative can sign Form 4506 for a taxpayer only if this authority has been specifically delegated to the representative on Form 2848, line 5a. Form 2848 showing the delegation must be attached to Form 4506,

Privacy Act and Paperwork Reduction Act Notice. We ask for the information on this form to establish your right to gain access to the requested return(s) under the Internal Revenue Code. We need this information to properly identify the return(s) and respond to your request. If you request a copy of a tax return, sections 6103 and 6109 require you to provide this information, including your SSN or EIN, to process your request. If you do not provide this information, we may not be able to process your request. Providing false or fraudulent information may subject you to penalties.

Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation, and cities, states, the District of Columbia, and U.S. commonwealths and possessions for use in administering their tax laws. We may also disclose this information to other countries under a tax treaty, to federal and state agencies to enforce federal nontax criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file Form 4506 will vary depending on individual circumstances. The estimated average time is: Learning about the law or the form, 10 min.; Preparing the form, 16 min.; and Copying, assembling, and sending the form to the IRS, 20 min.

If you have comments concerning the accuracy of these time estimates or suggestions for making Form 4506 simpler, we would be happy to hear from you. You can write to:

Internal Revenue Service Tax Forms and Publications Division 1111 Constitution Ave. NW, IR-6526 Washington, DC 20224.

Do not send the form to this address. Instead, see Where to file on this page.

CONSENT TO RELEASE FINANCIAL RECORDS

I,	of	, (City,
	ct any bank, saving and loan associa	
institution, finance co	mpany, commercial lending compa	ny, credit card processor,
credit card processing	g entity, automated clearing house, r	network transaction processor,
bank debit processing	g entity, brokerage house, escrow ag	gent, money market or mutual
fund, title company, o	commodity trading company, trustee	e, or person that holds,
controls, or maintains	custody of assets, wherever located	d,
which I am authorize information and deliv control which relate t Commission, and to g	trolled by me or at which there is and to draw, and its officers, employed er copies of all documents of every to the said accounts to any attorney of the evidence relevant thereto, in the exict Court of [], and this	es, and agents, to disclose all nature in its possession or of the Federal Trade
United States of Ame financial information construed as consent	n is intended to apply to the laws of rica which restrict or prohibit discles without the consent of the holder of with respect hereto, and the same shown be a relevant principal.	osure of bank or other fthe account, and shall be
Dated:	Signature:Printed Name:	