

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

Case No. 6:23-cv-1041-WWB-DCI

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

VISION ONLINE, INC., a Florida corporation,  
et al.

Defendants.

**JOINT APPLICATION FOR  
ENTRY OF STIPULATED  
ORDERS FOR PERMANENT  
INJUNCTION AND MONETARY  
JUDGMENT AS TO THE THE  
CORPORATE DEFENDANTS  
AND ALVAREZ DEFENDANTS  
AND DEFENDANT  
CHAMBERLAIN**

Plaintiff Federal Trade Commission (“FTC”) and Defendants Vision Online, Inc., Ganadores IBR, Inc., Vision Online Digital, LLC, Vision Online English, LLC, Vision Online Latino, LLC, Richard Alvarez, and Sara Alvarez (“Corporate Defendants and Alvarez Defendants”) and Defendant Bryce Chamberlain respectfully submit this Joint Application for Entry of Stipulated Orders for Permanent Injunction and Monetary Judgment as to the Corporate Defendants and Alvarez Defendants (“Corporate Defendants and Alvarez Stipulated Final Order”) and Defendant Chamberlain (“Chamberlain Stipulated Final Order”)(collectively “Stipulated Final Orders”). The Corporate Defendants and Alvarez Stipulated Final Order is signed by the FTC, the Alvarez Defendants and their counsel, and the Court-appointed Receiver on behalf of the Corporate Defendants. The Chamberlain Stipulated Final Order is signed by the FTC and Defendant Chamberlain.

The Chamberlain Stipulated Final Order, if approved and entered by the Court, will resolve all allegations in this matter as to Defendant Chamberlain.

The Corporate Defendants and Alvarez Stipulated Final Order, if approved and entered by the Court, will resolve all allegations in this matter as to the Corporate Defendants and Alvarez Defendants, leaving outstanding the Corporate Defendants and Alvarez Defendants' fully briefed Fee Motion (ECF 80) pending before the Court. By stipulating to the aforementioned Final Order, the Corporate Defendants and Alvarez Defendants do not hereby withdraw their Fee Motion and look forward to the Court's ruling on the same.

Pursuant to Local Rule 3.01(g), FTC counsel certifies that they conferred via email on January 12, 2024, with counsel for defendant Robert Shemin, and the Receiver. Neither oppose the filing of the Joint Application for Entry of Stipulated Orders for Permanent Injunction and Monetary Judgment by the FTC, the Corporate Defendants and Alvarez Defendants, and Defendant Chamberlain.

WHEREFORE, the FTC and the Corporate Defendants, the Alvarez Defendants, and Defendant Chamberlain jointly request that the Court enter the attached Stipulated Final Orders.

Respectfully submitted.

Date: January 17, 2024

/s/ Meghan Stoppel

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2024, a copy of the foregoing document was served on the following counsel of record via the CM/ECF system and on the Mr. Chamberlain, the *pro se* defendant, via email:

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