

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FEDERAL TRADE COMMISSION and
OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiffs,

v.

AMERICAN VETERANS FOUNDATION, INC.,
a corporation, and

PAUL K. MONVILLE, individually and as an
officer of AMERICAN VETERANS
FOUNDATION, INC.,

Defendants.

Case No. 8:19-cv-744-T-33TGW

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

Plaintiffs, the Federal Trade Commission (“FTC”) and the Office of the Attorney General, State of Florida, Department of Legal Affairs (“Florida Attorney General”) (collectively referred to as “Plaintiffs”), filed their Complaint for Permanent Injunction and Other Equitable Relief (“Complaint”) in this matter against Defendants American Veterans Foundation, Inc., and Paul K. Monville (collectively referred to as “Defendants”), alleging that Defendants violated the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 45, Section 310.3(b) of the Telemarketing Sales Rule (“TSR”), 16 C.F.R. Part 310.3(b), the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes

("FDUTPA"), and Florida's Solicitation of Contributions Act, Chapter 496, Florida Statutes. Plaintiffs and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction and Monetary Judgment against American Veterans Foundation, Inc., and Paul K. Monville ("Order"). This Order resolves all matters in dispute in this action between Plaintiffs and Defendants.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter. This Court has supplemental jurisdiction over the subject matter of the state law claims pursuant to 28 U.S.C. § 1367.
2. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.
3. Defendants' activities are in or affecting commerce as respectively defined in Section 4 of the FTC Act, 15 U.S.C. § 44, and Section 501.203(8), Florida Statutes.
4. The Complaint charges that Defendants participated in deceptive acts or practices by making false or misleading claims in charitable solicitations in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a). The Complaint further charges that Defendants' practices violated the FDUTPA and Florida's Solicitation of Contributions Act. The Complaint also charges that Defendants violated Section 310.3(b) of the TSR, 16 C.F.R. Part 310.3(b), by assisting and facilitating for-profit fundraisers in making charitable solicitations that violated Sections 310.3(a)(4) and 310.3(d)(1), (3), and (4) of the TSR.

5. Defendants waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to bear their own costs and attorney's fees.

6. Defendants waive all rights to appeal or otherwise challenge or contest the validity of this Order.

7. Defendants waive and release any claims that they may have against the FTC or the Florida Attorney General.

8. Entry of this Order is in the public interest.

DEFINITIONS

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

1. "American Veterans Foundation" means corporate defendant American Veterans Foundation, Inc., and its successors and assigns.

2. "Charitable Contribution" means any donation or gift of money or any other thing of value.

3. "Defendants" means corporate defendant, American Veterans Foundation, Inc., and individual defendant Paul K. Monville individually, collectively, or in any combination.

4. "Donor" means any Person solicited to make a Charitable Contribution.

5. "Fundraising" means a plan, program, or campaign that is conducted to induce Charitable Contributions by mail, telephone, electronic mail, social media, or any other means.

6. "Monville" means individual defendant Paul K. Monville.

7. "Nonprofit Organization" means any Person that is, or is represented to be, a nonprofit entity, or that has, or is represented to have, a charitable purpose.

8. "Person" means a natural person, an organization, or other legal entity, including a corporation, partnership, sole proprietorship, limited liability company, association, cooperative, or any other group or combination acting as an entity.

9. "Telemarketing" means any plan, program, or campaign which is conducted to induce the purchase of goods or services or a charitable contribution, by use of one or more telephones, and which involves more than one interstate telephone call, whether or not covered by the TSR.

ORDER

I. BAN ON SOLICITING CHARITABLE CONTRIBUTIONS

IT IS ORDERED that:

A. American Veterans Foundation is permanently restrained and enjoined from receiving any payment or other financial benefit from engaging, participating, or assisting in the solicitation of Charitable Contributions.

B. Monville is permanently restrained and enjoined from:

1. Receiving any payment or other financial benefit from (a) engaging in, Fundraising or participating in, or assisting in the solicitation of Charitable Contributions, directly or indirectly, including by advising, acting as an independent contractor or as a Fundraising consultant, supplying contact or Donor lists, or providing caging, mail processing, or fulfillment services; or (b) controlling, directly or indirectly, or holding a majority ownership interest in, any entity engaged in the

business of Fundraising;

2. Establishing, operating, controlling, or managing any Nonprofit Organization or other entity that holds charitable assets, or any program thereof, directly or indirectly, whether compensated or not, including by serving as an officer, director, trustee, chief executive, manager, supervisor, incorporator, or other fiduciary; and

3. Managing, controlling, directing, distributing, or accounting for the use or application of any charitable asset, or engaging, participating or assisting in managing, controlling, directing, distributing, or accounting for the use or application of any charitable asset, directly or indirectly, whether compensated or not, including by acting as an independent contractor, advisor, or consultant.

Provided that, subject to the limitations of Paragraphs I.B.1, I.B.2, and I.B.3, Monville may be employed by or volunteer for any Nonprofit Organization in any capacity not prohibited by the above, such as working in a non-supervisory role unrelated to the solicitation, management, custody, control, or distribution of any charitable asset.

Provided further that, notwithstanding the limitations of Paragraphs I.B.2 and I.B.3, within 180 days of entry of this Order, Monville may take whatever actions are required by law to wind up and dissolve American Veterans Foundation.

II. PROHIBITION AGAINST MISREPRESENTATIONS

IT IS FURTHER ORDERED that Defendants, Defendants' officers, directors, agents, employees, independent contractors, and attorneys, and all other Persons in active concert or participation with any of them who receive actual notice of this Order, whether acting directly or indirectly, in connection with Telemarketing or the advertising, marketing, promotion, offering for sale, selling, or distribution of any good, or service, are permanently restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication, any material fact.

III. TELEMARKETING SALES RULE COMPLIANCE

IT IS FURTHER ORDERED that Defendants, Defendants' officers, directors, agents, employees, independent contractors, 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 permanently restrained and enjoined from violating, or assisting others in violating, the TSR, 16 C.F.R. Part 310, a copy of which is attached.

IV. COMPLIANCE WITH STATE LAW

IT IS FURTHER ORDERED that Defendants, Defendants' officers, directors, agents, employees, independent contractors, and attorneys, whether acting directly or indirectly, are hereby permanently restrained and enjoined from violating, or assisting others in violating, any provision of the FDUTPA, or Florida's Solicitation of Contributions Act, Chapter 496, Florida Statutes.

V. COOPERATION

IT IS FURTHER ORDERED that Defendants must cooperate fully with Plaintiffs' representatives in this case and in any investigation related to or associated with the transactions or occurrences that are the subject of the Complaint. Defendants must provide truthful and complete information, evidence, and testimony. Monville must appear, and American Veterans Foundation must cause its officers, employees, representatives, or agents to appear for interviews, discovery, hearings, trials, and any other proceedings that either Plaintiff's representative may reasonably request upon five (5) days' written notice, or other reasonable notice, at such places and times as either Plaintiff's representative may designate, without the service of a subpoena.

VI. DONOR INFORMATION

IT IS FURTHER ORDERED that Defendants, Defendants' officers, directors, agents, independent contractors, 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:

A. Are permanently restrained and enjoined from disclosing, using, or benefitting from any information about or list of Donors to American Veterans Foundation, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a Donor's account (including a credit card, bank account, or other financial account), that was obtained prior to entry of this Order;

B. Shall destroy, or cause to be destroyed, all information related to Donors, including any list of Donors to American Veterans Foundation, in their possession, custody or control, in all forms within ten (10) days after entry of this Order, and,

C. Shall, within seven (7) days after entry of this Order:

1. Send a copy of this Order and provide clear and conspicuous notice of the prohibitions in this Section to each fundraiser, telemarketer, independent contractor, list management company, escrow agent, or other third party with possession, custody, or control of any such information about Donors to American Veterans Foundation; and

2. Direct that each such fundraiser, telemarketer, independent contractor, list management company, escrow agent, or other third party immediately destroy, or cause to be destroyed, all such Donor information in its possession, custody, or control and provide a sworn notice to American Veterans Foundation within thirty (30) days of receipt of the Order attesting to its destruction.

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

VII. MONETARY JUDGMENT AND PARTIAL SUSPENSION

IT IS FURTHER ORDERED that judgment is hereby entered against Defendants as follows:

A. Judgment in the amount of Six Million Five Hundred Eighty-Four Thousand Two Hundred Eighty-Two Dollars and No Cents (\$6,584,282.00) is entered in favor of Plaintiffs against Defendants, jointly and severally, as equitable monetary relief.

B. Defendants are ordered to pay One Hundred and Five Thousand Dollars and No Cents (\$105,000.00). This sum will be paid to a Nonprofit Organization as a Charitable Contribution as set forth below, following subsequent motion by the Florida Attorney General and order of this Court.

C. Defendants stipulate that their undersigned counsel holds the monies owed pursuant to Paragraph VII.B in a client trust account for no purpose other than payment to the Florida Department of Legal Affairs Escrow Fund ("Florida Escrow Fund").

D. The monies owed by Defendants and held in a client trust account by their undersigned counsel shall be transferred within three (3) days of entry of this Order to the Florida Escrow Fund, which shall hold this amount for no purpose other than future payment as a Charitable Contribution. This transfer shall be made by wire transfer, cashier's check, or other certified funds made payable to the Florida Department of Legal Affairs Escrow Fund.

E. American Veterans Foundation releases any interest in and directs that all remaining monies held in the attorney retainer, escrow, or trust account of undersigned counsel on behalf of American Veterans Foundation after all reasonable costs and attorney's fees have been paid, shall be paid to the Florida Escrow Fund which shall hold this amount for no purpose other than future payment as a Charitable Contribution. This amount shall be determined and paid within thirty (30) days after entry of this Order. All such payments shall be made by wire transfer, cashier's check, or other certified funds made payable to the Florida Department of Legal Affairs Escrow Fund.

F. Upon completion of the payments described in Paragraphs VII.D and VII.E, the remainder of the judgment is suspended, subject to Paragraphs VII.H and VIII.E.

G. Plaintiffs' agreement to the suspension of part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of Defendants' sworn financial statements and related documents (collectively referred to as "Financial Representations") submitted to the Plaintiffs, namely:

1. Financial statement of American Veterans Foundation, signed by Monville on June 29, 2018, including the attachments;
2. Financial statement of Monville, signed on August 1, 2018, including the attachments; and
3. 2017 IRS Form 990 of American Veterans Foundation, signed by Monville on August 25, 2018, under penalty of perjury.

H. The suspension of the judgment will be lifted as to either Defendant if, upon motion by either Plaintiff, the Court finds that such Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the Financial Representations identified above.

I. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Defendant in the amount specified in Paragraph VII.A (which the parties stipulate only for purposes of this Section represents the consumer injury alleged in the Complaint), less any payment previously made pursuant to this Section, plus interest computed from the date of entry of this Order. Payments on the judgment shall be made to the Florida Escrow Fund if the Court has not yet approved a Nonprofit Organization to receive the Charitable Contribution pursuant to Paragraph VII.J. Such payments shall be made by wire transfer, cashier's check, or other certified funds made payable to the Florida

Department of Legal Affairs Escrow Fund. If the Court has approved a Nonprofit Organization to receive a Charitable Contribution pursuant to Paragraph VII.J, then any such payments shall be made to the approved Nonprofit Organization.

J. A Nonprofit Organization shall be identified by the Florida Attorney General as a suitable recipient of the Charitable Contribution. The Florida Attorney General shall submit to this Court a motion and proposed order recommending a proposed recipient for the Charitable Contribution, the amount to be paid to the proposed recipient, and the manner and timeframe for payment. All monies paid by Defendants and held in the Florida Escrow Fund shall be distributed only as authorized and directed by this Court. Defendants shall have no right to challenge any recommendations regarding any Charitable Contribution or monetary distribution made by the Florida Attorney General.

K. Defendants understand that any Charitable Contribution described herein is being made in lieu of consumer restitution and not on behalf of either Defendant. Therefore, Defendants stipulate that neither of them will claim any tax deduction, credit, or other benefit related to any Charitable Contribution discussed in this Order.

VIII. ADDITIONAL MONETARY PROVISIONS

IT IS FURTHER ORDERED that:

A. Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order and may not seek the return of any assets.

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of any Plaintiff, including in a proceeding to

enforce the right to any payment or monetary judgment pursuant to this Order, such as a nondischargeability complaint in any bankruptcy case.

C. The facts alleged in the Complaint establish all elements necessary to sustain an action by either Plaintiff pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order will have collateral estoppel effect for such purposes.

D. Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Numbers and/or Employer Identification Numbers), which Defendants previously submitted to Plaintiffs, may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

E. If American Veterans Foundation has or receives any funds after wind up of its affairs and before the Court has entered an order approving payment of a Charitable Contribution to a Nonprofit Organization, then American Veterans Foundation shall pay its remaining funds to the Florida Escrow Fund, which shall hold this amount for no purpose other than future payment as a Charitable Contribution as provided for in Paragraph VII.J. All such payments shall be made by wire transfer, cashier's check, or other certified funds made payable to the Florida Department of Legal Affairs Escrow Fund. If American Veterans Foundation has or receives any funds after wind up of its affairs and after the Court has entered an order approving payment of a Charitable Contribution to a Nonprofit Organization, then American Veterans Foundation shall pay any such funds directly to the approved Nonprofit Organization and provide notice to the Florida Attorney General of such payment in the manner provided for in Paragraph X.F.

IX. ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that Defendants obtain acknowledgments of receipt of this Order:

A. Each Defendant, within seven (7) days of entry of this Order, must submit to the FTC an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For three (3) years after entry of this Order, Monville, for any business that he, individually or collectively with American Veterans Foundation is the majority owner, or that he controls directly or indirectly, and American Veterans Foundation must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for conduct related to the subject matter of the Order and all agents and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within seven (7) days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which a Defendant delivers a copy of this Order, that Defendant must obtain, within thirty (30) days, a signed and dated acknowledgment of receipt of this Order.

X. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Defendants make timely submissions to the FTC and the Florida Attorney General:

A. One (1) year after entry of this Order, each Defendant must submit a

compliance report, sworn under penalty of perjury:

1. Each Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Plaintiffs may use to communicate with Defendant; (b) identify all of that Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which Monville must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how that Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order acknowledgment obtained pursuant to this Order, unless previously submitted to the FTC and the Florida Attorney General;

2. Additionally, Monville must: (a) identify all telephone numbers and all physical, postal, email, and Internet addresses, including all residences; (b) identify all his business activities, including any business for which he performs services whether as an employee or otherwise and any entity in which he has any ownership interest; and (c) describe in detail his involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership; and

3. For any activity with any Nonprofit Organization, Monville must: (a) identify each such Nonprofit Organization by all of its names, telephone number(s), and physical, postal, email, and Internet addresses; (b) describe in detail his involvement in each such Nonprofit Organization, including any title, role,

responsibilities, participation, authority, and control; and (c) describe in detail whether and how Monville is in compliance with each Section of this Order.

B. For ten (10) years after entry of this Order, each Defendant must submit a compliance notice, sworn under penalty of perjury, within fourteen (14) days of any change in the following:

1. Each Defendant must report any change in (a) any designated point of contact or (b) the structure of American Veterans Foundation or any entity that Monville has any ownership interest in or controls, directly or indirectly, that may affect compliance obligations arising under this Order, including creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order; and

2. Monville must report any change in (a) name, including aliases or fictitious names, or residence address or (b) title or role in any business activity, including any business for which he performs services whether as an employee or otherwise, and any entity in which he has any ownership interest or which he controls, directly or indirectly, and identify the name, physical address, and any Internet address of the business or entity.

C. Each Defendant must submit to the FTC and Florida Attorney General notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such Defendant within fourteen (14) days of its filing.

D. Any submission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: "I

declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: [date] at [location]" and supplying the signatory's full name, title (if applicable), and signature.

E. Unless otherwise directed by a FTC representative in writing, all submissions to the FTC pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not U.S. Postal Service) to:

Associate Director for Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

The subject line must begin: FTC et al. v. American Veterans Foundation, Inc., Matter No. 1723163.

F. Unless otherwise directed by a representative of the Florida Attorney General in writing, all submissions to the Florida Attorney General pursuant to this Order must be emailed to oag.ec.ori@myfloridalegal.com or sent to:

Florida Office of the Attorney General
Consumer Protection Division
135 W. Central Blvd., Suite 1000
Orlando, FL 32801

The subject line must begin: FTC et al. v. American Veterans Foundation, Inc.

XI. RECORDKEEPING

IT IS FURTHER ORDERED that Defendants must create certain records for ten (10) years after entry of this Order, and retain each such record for five (5) years. Specifically, for any business or Nonprofit Organization of which they are a majority owner or control directly or indirectly, Defendants must create and retain the following records:

- A. Accounting records showing the revenues from all goods or services sold or billed or received through Charitable Contributions;
- B. Personnel records showing, for each Person providing services, whether as an employee or otherwise, that Person's name; address; telephone number; job title or position; dates of service; and reason for termination (if applicable);
- C. Records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response;
- D. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to Plaintiffs; and
- E. A copy of each unique advertisement, charitable solicitation, or other marketing material.

XII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants' compliance with this Order, including the financial representations upon which part of the judgment was suspended:

- A. Within fourteen (14) days of receipt of a written request from a representative of either Plaintiff, each Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. Both Plaintiffs are also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

B.e For matters concerning this Order, both Plaintiffs are authorized to communicate directly with each Defendant. Defendants must permit representatives of either Plaintiff to interview any employee or other Person affiliated with any Defendant who has agreed to such an interview. The Person interviewed may have counsel present.

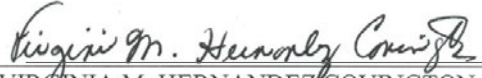
C.e Both Plaintiffs may use all other lawful means, including posing, through their representatives as consumers, suppliers, or other individuals or entities, to Defendants or any individual or entity affiliated with Defendants, without the necessity of identification or prior notice. Nothing in this Order limits the FTC's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

D.e Upon written request from a representative of either Plaintiff, any consumer reporting agency must furnish a report concerning Monville pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)(1).

XIII. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

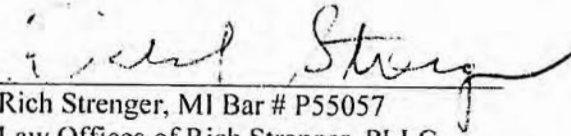
SO ORDERED this 28th day of March, 2019.


VIRGINIA M. HERNANDEZ COVINGTON
UNITED STATES DISTRICT JUDGE

SO STIPULATED AND AGREED:

FOR DEFENDANTS:

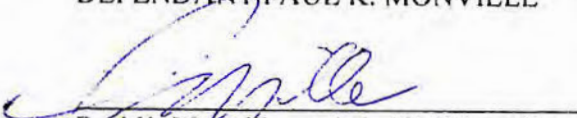
DEFENDANT AMERICAN VETERANS
FOUNDATION, INC.



Rich Strenger, MI Bar # P55057
Law Offices of Rich Strenger, PLLC
1064 Arbroak Way
Lake Orion, MI 48362
*Application for *pro hac vice* pending
Attorney for Defendant American Veterans
Foundation, Inc.

Date: 1/2/19

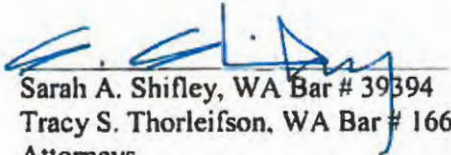
DEFENDANT PAUL K. MONVILLE



Paul K. Monville, on behalf of himself
individually and on behalf of American
Veterans Foundation, Inc.

Date: 12/16/2018

FOR PLAINTIFF FEDERAL TRADE
COMMISSION:



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Date: MARCH 25, 2019

FOR PLAINTIFF OFFICE OF THE ATTORNEY
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DEPARTMENT OF LEGAL AFFAIRS:

ASHLEY MOODY
Attorney General



Donna Cecilia Valin, FL Bar # 96687
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Date: 03/27/19



Patricia Conners, FL Bar # 361275
Deputy Attorney General

Date: 3/27/19

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