## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff.

v.

CONSUMER EDUCATION.INFO, INC. also d/b/a Consumer Education Outreach, a Missouri corporation;

EPATH LIVE LLC, a Missouri limited liability corporation;

WEBNET CONSULTING INC. also d/b/a ePath Media, a California corporation;

DHM MEDIA CORP., a Colorado corporation;

WILLIAM R. BASKIN, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach, ePath Live LLC and WebNet Consulting Inc. also d/b/a ePath Media, JEREMY BUTTKE, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach, ePath Live LLC and WebNet Consulting Inc. also d/b/a ePath Media, TETSUYA KOSAKA, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach, ePath Live LLC and WebNet Consulting Inc. also d/b/a ePath Media and

JEFFREY L. RANDOL, individually and as an officer of Consumer Education.info, Inc. also d/b/a Consumer Outreach and of ePath Live LLC and as an officer and sole shareholder of DHM Media Corp.

Defendants.

## UNITED STATES OF AMERICA'S UNOPPOSED MOTION REQUESTING ENTRY OF STIPULATED FINAL ORDER FOR PERMANENT INJUNCTION AND CIVIL PENALTY JUDGMENT

Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission ("FTC" or "Commission"), pursuant to Section 16(a)(1) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 56(a)(1), respectfully moves for entry of the proposed Stipulated Final Order For Permanent Injunction and Civil Penalty Judgment ("Stipulated Final Order and Judgment"). The proposed Stipulated

Final Order and Judgment is attached as Exhibit "A" and may be entered at this time without further hearing.

The parties to this matter have agreed to settle the case and stipulated to entry of the proposed Stipulated Final Order and Judgment without further notice to any party or other proceedings. No party has requested a hearing.

As counsel for the United States, I have conferred with all parties. I hereby certify in accordance with Local Rule 7.1(a) of the United States District Court for the District of Colorado that the attorneys of record and parties have agreed to this motion and the relief sought.

WHEREFORE, the United States moves for this Court's entry of the proposed Stipulated Final Order and Judgment.

Dated: November 1, 2016

FEDERAL TRADE COMMISSION

OF COUNSEL:

CHARLES A. HARWOOD
Regional Director
Northwest Region
Jennifer Larabee, CA #163989
Nadine Samter. WA #23881
Attorneys
Federal Trade Commission
Northwest Region
915 Second Avenue, Suite 2896
Seattle, Washington 98174
(206) 220-6350 (main)
(206) 220 6366 (facsimile)
jlarabee@ftc.gov, nsamter@ftc.gov

Respectfully submitted,

FOR THE UNITED STATES OF AMERICA

BENJAMIN C. MIZER Principal Deputy Assistant Attorney General Civil Division U.S. DEPARTMENT OF JUSTICE

BOB TROYER Acting United States Attorney

MICHAEL S. BLUME
Director
Consumer Protection Branch
U.S. DEPARTMENT OF JUSTICE

Raquel Toledo, PA #321175

Trial Attorney

Consumer Protection Branch U.S. Department of Justice

P.O. Box 386

Washington, DC 20044

(202) 532-4719 (direct)

(202) 514-8742 (facsimile)

Raquel.Toledo@usdoj.gov