

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FEDERAL TRADE COMMISSION

Plaintiff,

v.

GLOBAL PROCESSING
SOLUTIONS, LLC, et al.

Defendants.

Case No. 1:17-cv-4192-MHC

**DEFAULT JUDGMENT AND
FINAL ORDER FOR
PERMANENT INJUNCTION
AND OTHER MONETARY
RELIEF AGAINST
DEFENDANTS ADVANCED
MEDIATION GROUP, LLC,
APEX NATIONAL SERVICES,
LLC, MITCHELL &
MAXWELL, LLC, AND
MIRAGE DISTRIBUTION**

Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed a Complaint on October 23, 2017, seeking a permanent injunction and other equitable relief, (“Complaint”), pursuant to Section 13(b) of the Federal Trade Commission Act, 15 U.S.C. § 53(b) and Section 814 of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692l. The FTC’s Complaint and summons was properly served on Advanced Mediation Group, LLC, Apex National Services, LLC, Mitchell & Maxwell, LLC, and Mirage Distribution (collectively, “Unrepresented Corporate Defendants”). Unrepresented Corporate Defendants did not file either an Answer or a Motion to Dismiss the Complaint within 21 days of service with the Complaint. Accordingly, the

Clerk entered default against Unrepresented Corporate Defendants, pursuant to Federal Rule of Civil Procedure 55(a), on July 17, 2018. The FTC now moves this Court for entry of a judgment by default and permanent injunction, pursuant to Federal Rule of Civil Procedure 55(b)(2), against Unrepresented Corporate Defendants. The Court, having considered the memoranda and exhibits filed in support of said motion, and all other pleadings and filings in this action, **GRANTS** the FTC's Motion and **HEREBY ORDERS, ADJUDGES, AND DECREES** as follows:

FINDINGS

This Court, having considered the pleadings in the record, declarations, exhibits, memoranda, and arguments presented, finds that:

1. This is an action by the FTC instituted under Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and Section 814(a) of the FDCPA, 15 U.S.C. § 1692l(a). The Complaint seeks both permanent injunctive relief and equitable monetary relief for the Defendants' alleged deceptive acts or practices as alleged therein.
2. The FTC has the authority under Section 13(b) of the FTC Act, and Section 814 of the FDCPA, to seek the relief it has requested, and the Complaint states a claim upon which relief can be granted against Defendants.

3. This Court has jurisdiction over the subject matter of this case and has jurisdiction over all the parties hereto, and venue in this district is proper.
4. The activities of Unrepresented Corporate Defendants, as alleged in the Complaint, were in or affecting commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
5. Each Unrepresented Corporate Defendant is a “debt collector” collecting “debts,” as those terms are defined by the FDCPA, 15 U.S.C. §§ 1692a(6) & (5).
6. Process and service of process as to each Unrepresented Corporate Defendant is proper.
7. Unrepresented Corporate Defendants have failed to answer or otherwise file any response to the Complaint. Accordingly, each Unrepresented Corporate Defendant is in default for failure to plead or otherwise defend in this action.
8. Because of Unrepresented Corporate Defendants’ default, the factual allegations in the Complaint are taken as true.
9. As alleged in the Complaint, the Unrepresented Corporate Defendants formed a common enterprise with corporate defendants Global Processing Solutions, LLC, Intrinsic Solutions, LLC, North Center Collections, Inc, Capital Security Investments, LLC, Diverse Financial

Enterprises, Inc., and American Credit Adjusters, LLC.

10. As alleged in Counts I and III of the Complaint, in numerous instances each Unrepresented Corporate Defendant, directly or indirectly, used false and misleading representations to collect debts. These false and misleading representations were likely to mislead consumers acting reasonably under the circumstances. Therefore, the Unrepresented Corporate Defendants' practices constitute deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a). In making these representations, each Unrepresented Corporate Defendant also (a) falsely represented or implied that nonpayment of a debt would result in the arrest or imprisonment of a person, in violation of Section 807(4) of the FDCPA, 15 U.S.C. § 1692e(4); and (b) falsely threatened to take an action that Unrepresented Corporate Defendants did not intend to take, such as filing a lawsuit, in violation of Section 807(5) of the FDCPA, 15 U.S.C. § 1692e(5).
11. As alleged in Counts II and III of the Complaint, in numerous instances each Unrepresented Corporate Defendant, directly or indirectly, made false or unsubstantiated representations that consumers owed purported debts. These false or unsubstantiated representations were likely to mislead consumers acting reasonably under the circumstances. Therefore, the Unrepresented Corporate Defendants' practices

constitute deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a). In making these representations, each Unrepresented Corporate Defendant also falsely represented the character or legal status of a debt, in violation of Section 807(2)(A) of the FDCPA, 15 U.S.C. § 1692e(2)(1).

12. As alleged in Count III of the Complaint, in numerous instances, each Unrepresented Corporate Defendant, directly or indirectly, failed to disclose in the initial communication with a consumer that the Unrepresented Corporate Defendant was a debt collector attempting to collect a debt and that any information obtained would be used for that purpose, or failed to disclose in subsequent communications that the communication is from a debt collector, in violation of Section 807(11) of the FDCPA, 15 U.S.C. § 1692e(11).
13. As alleged in Count IV of the Complaint, in numerous instances each Unrepresented Corporate Defendant, directly or indirectly, communicated with third parties for purposes other than acquiring location information about a consumer, without having obtained directly the prior consent of the consumer or the express permission of a court of competent jurisdiction, and when not reasonably necessary to effectuate a post judgment judicial remedy, in violation of Section 805(b) of the FDCPA, 15 U.S.C. § 1692c(b).

14. As alleged in Count V of the Complaint, in numerous instances each Unrepresented Corporate Defendant, directly or indirectly, failed to provide a consumer, either in an initial communication or a written notice sent within five days after the initial communication, with information about the debt and the right to dispute the debt, in violation of Section 809(a) of the FDCPA, 15 U.S.C. § 1692g(a).
15. Plaintiff FTC has provided a reasonable basis for calculating Defendants' revenues from their collection activity between January 2, 2015 and April 3, 2017 as Three Million Four Hundred Sixty-Two Thousand Six Hundred Sixty-Four Dollars (\$3,462,664.00).
16. Absent a permanent injunction, there is a reasonable likelihood that each Unrepresented Corporate Defendant will continue to engage in the unlawful conduct alleged in the Complaint or similar misconduct. Unrepresented Corporate Defendants' misconduct presents a proper case for permanent injunctive relief under 15 U.S.C. § 53(b), and an injunction to prevent future misconduct by each Unrepresented Corporate Defendant is in the public interest. It is proper in this case to issue a permanent injunction that: (a) bans each Unrepresented Corporate Defendant from (i) participating in debt collection activities and (ii) advertising, marketing, promoting, offering for sale, processing payments for, selling, or buying any consumer or commercial debt or

any consumer information relating to a debt; (b) prohibits each Unrepresented Corporate Defendant from making certain misrepresentations concerning financial-related products and services, including misrepresenting any material fact in connection with the advertising, marketing, promotion, or sale of a financial-related product or service, such as the terms or rates available for a loan, or the savings a consumer will receive from purchasing a debt relief service; (c) prohibits each Unrepresented Corporate Defendant from disclosing, using, or benefitting from previously obtained consumer information, such as a consumer's name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a customer's account (including a credit card, bank account, or other financial account); and (d) provides for monitoring by the FTC of each Unrepresented Corporate Defendant's compliance with such a permanent injunction.

17. Because Unrepresented Corporate Defendants have operated as a common enterprise with the other corporate defendants, each Unrepresented Corporate Defendant is jointly and severally liable for the acts and practices alleged in the Complaint. It is proper in this case to enter an equitable monetary judgment against Unrepresented Corporate Defendants for their violations of Section 5 of the FTC Act

and the FDCA. The FTC is entitled to judgment against Unrepresented Corporate Defendants, jointly and severally, in the amount of Three Million Four Hundred Sixty-Two Thousand Six Hundred Sixty-Four Dollars (\$3,462,664.00), the injury caused to consumers by Unrepresented Corporate Defendants.

18. This Order is in addition to, and not in lieu of, any other civil or criminal remedies that may be provided by law.
19. Entry of this Order is in the public interest.

DEFINITIONS

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

1. **“Credit repair services”** means using any instrumentality of interstate commerce or the mails to sell, provide, or perform any service, in return for the payment of money or other valuable consideration, for the express or implied purpose of (i) improving any consumer’s credit record, credit history, or credit rating, or (ii) providing advice or assistance to any consumer with regard to any activity or service described in clause (i).
2. **“Debt”** means any obligation or alleged obligation to pay money arising out of a transaction, whether or not such obligation has been reduced to judgment.
3. **“Debt collection activities”** mean any activities of a debt collector to

collect or attempt to collect, directly or indirectly, a debt owed or due, or asserted to be owed or due.

4. **“Debt collector”** means any person who uses any instrumentality of interstate commerce or the mails in any business the principal purpose of which is the collection of any debts, or who regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another. The term also includes any creditor who, in the process of collecting its own debts, uses any name other than its own which would indicate that a third person is collecting or attempting to collect such debts. The term also includes any person to the extent such person collects or attempts to collect any debt that was in default at the time it was obtained by such person.

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

A. **“Corporate Defendants”** means Global Processing Solutions, LLC, Intrinsic Solutions, LLC, North Center Collections, Inc., Advanced Mediation Group, LLC, Apex National Services, LLC, Capital Security Investments, LLC, Mitchell & Maxwell, LLC, Mirage Distribution, LLC, Diverse Financial Enterprises, Inc., American Credit Adjusters, LLC, and their successors and assigns.

B. **“Individual Defendants”** means Lamar Snow, Jahaan McDuffie, and Glentis Wallace.

6. **“Financial-related product or service”** means any product, service, plan, or program represented, expressly or by implication, to:

A. Provide to any consumer, arrange for any consumer to receive, or assist any consumer in receiving, an extension of consumer credit;

B. Provide to any consumer, arrange for any consumer to receive, or assist any consumer in receiving, credit repair services; or

C. Provide to any consumer, arrange for any consumer to receive, or assist any consumer in receiving, any secured or unsecured debt relief product or service.

7. **“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.

8. **“Secured or unsecured debt relief product or service”** means, with respect to any mortgage, loan, or obligation between a person and one or more secured or unsecured creditors or debt collectors, any product, service, plan, or program represented, expressly or by implication, to:

- A. Negotiate, settle, or in any way alter the terms of payment or other terms of the mortgage, loan, debt, or obligation, including but not limited to, a reduction in the amount of interest, principal balance, monthly payments, or fees owed by a person to a secured or unsecured creditor or debt collector;
- B. Stop, prevent or postpone any mortgage or deed of foreclosure sale for a person's dwelling, any other sale of collateral, any repossession of a person's dwelling or other collateral, or otherwise save a person's dwelling or other collateral from foreclosure or repossession;
- C. Obtain any forbearance or modification in the timing of payments from any secured or unsecured holder of any mortgage, loan, debt, or obligation;
- D. Negotiate, obtain, or arrange any extension of the period of time within which the person may (i) cure his or her default on the mortgage, loan, debt, or obligation, (ii) reinstate his or her mortgage, loan, debt, or obligation, (iii) redeem a dwelling or other collateral, or (iv) exercise any right to reinstate the mortgage, loan, debt, or obligation or redeem a dwelling or other collateral; or
- E. Negotiate, obtain, or arrange (i) a short sale of a dwelling or other

collateral, (ii) a deed-in-lieu of foreclosure, or (iii) any other disposition of a mortgage, loan, debt, or obligation other than a sale to a third party that is not the secured or unsecured loan holder.

The foregoing shall include any manner of claimed assistance, including, but not limited to, auditing or examining a person's application for the mortgage, loan, debt, or obligation.

9. **“Unrepresented Corporate Defendants”** means Advanced Mediation Group, LLC, Apex National Services, LLC, Mitchell & Maxwell, LLC, and Mirage Distribution, LLC.

ORDER

BAN ON DEBT COLLECTION ACTIVITIES

I. **IT IS ORDERED** that Unrepresented Corporate Defendants, whether acting directly or through an intermediary, are permanently restrained and enjoined from:

- A. Participating in debt collection activities; and
- B. Advertising, marketing, promoting, offering for sale, processing payments for, selling, or buying, any debt or any information regarding a consumer relating to a debt.

**PROHIBITED MISREPRESENTATIONS RELATING TO
FINANCIAL-RELATED PRODUCTS OR SERVICES**

II. IT IS FURTHER ORDERED that Unrepresented Corporate Defendants, Unrepresented Corporate 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, in connection with the advertising, marketing, promotion, offering for sale or sale of any financial-related product or service, are permanently restrained and enjoined from:

- A. Misrepresenting or assisting others in misrepresenting, expressly or by implication, any material fact, including but not limited to:
1. The terms or rates that are available for any loan or other extension of credit;
 2. Any person's ability to improve or otherwise affect a consumer's credit record, credit history, or credit rating or ability to obtain credit;
 3. That any person can improve any consumer's credit record, credit history, or credit rating by permanently removing negative information from the consumer's credit record, credit history, or credit rating, even where such information is accurate and not obsolete;

4. Any aspect of any secured or unsecured debt relief product or service, including but not limited to, the amount of savings a consumer will receive from purchasing, using, or enrolling in such secured or unsecured debt relief product or service; the amount of time before which a consumer will receive settlement of that consumer's debts; or the reduction or cessation of collection calls;

5. That a consumer will receive legal representation;

6. That any particular outcome or result from a financial-related product or service is guaranteed, assured, highly likely or probable, or very likely or probable;

7. The nature or terms of any refund, cancellation, exchange, or repurchase policy, including, but not limited to, the likelihood of a consumer obtaining a full or partial refund, or the circumstances in which a full or partial refund will be provided to the consumer;

8. Any other fact material to consumers concerning any financial-related product 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

B. Advertising or assisting others in advertising credit terms other than those terms that actually are or will be arranged or offered by a creditor or lender.

MONETARY JUDGMENT

III. IT IS FURTHER ORDERED that:

A. Judgment in the amount of Three Million Four Hundred Sixty-Two Thousand Six Hundred Sixty-Four Dollars (\$3,462,664.00) is entered in favor of the Commission against Unrepresented Corporate Defendants, jointly and severally, as equitable monetary relief. The monetary judgment set forth in this Section III is enforceable against any asset owned jointly by, on behalf of, for the benefit of, or in trust by or for, any Unrepresented Corporate Defendant, whether held as tenants in common, joint tenants with or without the right of survivorship, tenants by the entirety, and/or community property.

B. Immediately upon entry of this Order, Unrepresented Corporate Defendants shall surrender to the Receiver all control, title, dominion, and interest Unrepresented Corporate Defendants have in any assets in the possession of the Receiver or frozen pursuant to the Preliminary Injunction order (Dkt. 34). The value of such assets will be applied toward satisfying the judgment amount identified in Subsection A of this Section.

C. Upon completion of the transfers identified in Subsection B of this Section III, the asset freeze as to the Unrepresented Corporate Defendants is dissolved.

D. The judgment entered pursuant to this Section is equitable monetary relief, solely remedial in nature, and not a fine, penalty, punitive assessment, or forfeiture.

E. Each Unrepresented Corporate Defendant is hereby required, unless it has done so already, to furnish to the Commission its Taxpayer Identification Number, which may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. §7701.

F. All money paid to the Commission pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining money for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to Unrepresented Corporate Defendants' practices alleged in the Complaint. Any money

not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement. Unrepresented Corporate Defendants have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

CONSUMER INFORMATION

IV. IT IS FURTHER ORDERED that Unrepresented Corporate Defendants, Unrepresented Corporate 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 permanently restrained and enjoined from:

- A. failing to provide sufficient customer information to enable the Commission to efficiently administer consumer redress. Unrepresented Corporate Defendants represent that they have provided this redress information to the Commission. If a representative of the Commission requests in writing any information related to redress, Unrepresented Corporate Defendants must provide it, in the form prescribed by the Commission, within 14 days;
- B. disclosing, using, or benefitting from customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that

enables access to a customer's account (including a credit card, bank account, or other financial account), that Unrepresented Corporate Defendant obtained prior to entry of this Order in connection with any debt collection activities;

C. failing to destroy such customer information in all forms in their possession, custody, or control within 30 days after receipt of written direction to do so from a representative of the Commission.

Provided, however, that customer 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.

CONTINUATION OF RECEIVER

V. IT IS FURTHER ORDERED that Michael Fuqua shall continue as a permanent receiver over Unrepresented Corporate Defendants, with full powers of a permanent receiver including but not limited to those powers set forth in the Preliminary Injunction entered in this matter on November 17, 2017, and including full liquidation powers. Upon entry of this Order, the Receiver is authorized to liquidate all remaining receivership property as to Unrepresented Corporate Defendants. Upon resolution of this case with respect to all Defendants, the Receiver is authorized to dispose of all remaining files, records, and computers as to Unrepresented Corporate Defendants. The Receiver is directed to wind up Unrepresented Corporate

Defendants and liquidate all assets of these entities within 120 days after entry of this Order, but any party or the Receiver may request that the Court extend the Receiver's term for good cause. Upon termination of the receivership as to Unrepresented Corporate Defendants, and final payment to the Receiver of all approved fees, costs, and expenses, the Receiver shall turn over to the FTC or its designated agent all remaining assets of Unrepresented Corporate Defendants in the receivership estate.

ORDER ACKNOWLEDGMENTS

VI. IT IS FURTHER ORDERED that Unrepresented Corporate Defendants obtain acknowledgments of receipt of this Order:

- A. Unrepresented Corporate Defendants, within 7 days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. For 5 years after entry of this Order, Unrepresented Corporate Defendants must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within 7 days of entry of this Order for current personnel. For all others, delivery must occur before they

assume their responsibilities.

C. From each individual or entity to which Unrepresented Corporate Defendants delivered a copy of this Order, Unrepresented Corporate Defendants must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

COMPLIANCE REPORTING

VII. IT IS FURTHER ORDERED that Unrepresented Corporate Defendants make timely submissions to the Commission:

A. One year after entry of this Order, Unrepresented Corporate Defendants must submit a compliance report, sworn under penalty of perjury:

1. Unrepresented Corporate Defendants must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Unrepresented Corporate Defendants; (b) identify all of Unrepresented Corporate Defendants' 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 Unrepresented Corporate Defendants must describe if they know or should know due to their own involvement); (d) describe in detail whether and how that Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.

B. For 10 years after entry of this Order, Unrepresented Corporate Defendants must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:

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

C. Unrepresented Corporate Defendants must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against Defendant within 14

days of its filing.

D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: _____” and supplying the date, signatory’s full name, title (if applicable), and signature.

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: FTC v. Global Processing Solutions, *et al*, X180006.

RECORDKEEPING

VIII. IT IS FURTHER ORDERED that Unrepresented Corporate Defendants must create certain records for 10 years after entry of the Order, and retain each such record for 5 years. Specifically, Unrepresented Corporate Defendants must create and retain the following records:

A. accounting records showing the revenues from all goods or services sold;

- B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response;
- D. all records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission; and
- E. a copy of each unique advertisement or other marketing material.

COMPLIANCE MONITORING

IX. IT IS FURTHER ORDERED that, for the purpose of monitoring Unrepresented Corporate Defendants' compliance with this Order, including the financial representations upon which part of the judgment was suspended and any failure to transfer any assets as required by this Order:

- A. Within 14 days of receipt of a written request from a representative of the Commission Unrepresented Corporate Defendants must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and

copying. The Commission is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

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

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

D. Upon written request from a representative of the Commission, any consumer reporting agency must furnish consumer reports

concerning Unrepresented Corporate Defendants, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

RETENTION OF JURISDICTION

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

SO ORDERED this 4th day of September, 2018.



MARK H. COHEN
United States District Judge