UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

DOCKET NO. 9395

TRAFFIC JAM EVENTS, LLC, a limited liability company

and

DAVID J. JEANSONNE II, individually and as an officer of TRAFFIC JAM EVENTS, LLC.

RESPONDENTS' MEMORANDUM IN OPPOSITION TO COMPLAINT COUNSEL'S MOTION TO CERTIFY TO THE COMMISSIONER A REQUEST SEEKING COURT ENFORCEMENT OF A SUBPOENA AD TESTIFICANDUM ISSUED TO JUSTIN BROPHY

Respondents, Traffic Jam Events, LLC and David Jeansonne (collectively "Respondents"), through undersigned counsel, offer this Memorandum In Opposition to the Motion to Certify to the Commissioner a Request Seeking Court Enforcement of a Subpoena *Ad Testificandum* Issued to Justin Brophy (the "Motion").

The Motion should be denied because the request for further discovery was outside of the July 16, 2021 Scheduling Order deadline, and Complaint Counsel has not provided good cause as to why the requested deposition was not noticed prior to July 16, 2021.

BACKGROUND FACTS

Pursuant to the First Amended Scheduling Order, all discovery, including depositions, was to be completed by July 16, 2021. Beginning on September 3, 2020, Complaint Counsel identified Justin Brophy as a person with discoverable and relevant information. (**Exhibit 1**, Complaint Counsel's Initial Disclosures). From that point forward, Complaint Counsel could have simply noticed the deposition of Mr. Brophy at any point. At the time, Mr. Brophy was a Traffic Jam

contractor and would have been produced by counsel for Respondents. On December 11, 2020, Complaint Counsel issued its "Notice of Deposition" setting the deposition of Justin Brophy for January 5, 2021, to be conducted remotely. Complaint Counsel never pursued this deposition. The case was then removed from adjudicative status on December 28, 2020.

The matter was returned to adjudicative status on May 3, 2021, and on May 7, 2021, this Court entered its First Revised Scheduling Order with dates proposed by Complaint Counsel, including the July 16, 2021 discovery deadline. As of May 12, 2021, Complaint Counsel advised Respondents' that it was continuing "to proceed with discovery and litigation," and acknowledged receiving discovery responses from Justin Brophy. (Exhibit 2, May 12, 2021 Email from Complaint Counsel to Individual Respondent). On May 18, 2021, Complaint Counsel issued a "Deposition Notice" to Traffic Jam Events, including Individual Respondent and five (5) other individuals. Respondents advised that Traffic Jam's employees had resigned and could not be produced by counsel at this time. The depositions of the five listed individuals were never pursued, and only Mr. Jeansonne was deposed. (Exhibit 3, May 18, 2021 Email from Complaint Counsel).

On July 19, 2021, after the close of discovery, Complaint Counsel sent out a Subpoena to Testify at a Deposition, purporting to notice the deposition of Justin Brophy. (**Exhibit 4**, July 19, 2021 Email from Complaint Counsel). This Notice was issued after the close of discovery. Counsel for Respondent objected to the discovery outside of the Scheduling Order. While Complaint Counsel cites an alleged inability to locate information concerning Mr. Brophy, including his last known address, this could not have prevented Complaint Counsel from timely pursing the deposition, including a subpoena. Mr. Brophy maintains a LinkedIn profile (**Exhibit 5**, https://www.linkedin.com/in/justin-brophy-89045a1b/), which could have been accessed at any point in time, and as far back as May of 2021. Mr. Brophy's LinkedIn profile identifies his

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residence - - Hillsborough, New Jersey. A simple Google search of "Justin Brophy" and "Hillsborough" reveals his last known contact information, including a telephone number, for Mr. Brophy. (Exhibit 6, https://www.beenverified.com/people/justin-brophy/). Included within this information is the 2 Norz Drive, Hillsborough, New Jersey address utilized by Complaint Counsel to send out the untimely Notice of Deposition. This discovery should have and could have been completed long ago. With the hearing date quickly approaching, additional discovery is preventing Respondent from preparing for the hearing.

CONCLUSION

On this basis, and the fact that Complaint Counsel could have noticed this deposition beginning in May of 2021, the request for certification to pursue discovery outside of the Court's First Revised Scheduling Order should be denied.

August 3, 2021

Respectfully submitted,

/s/ L. Etienne Balart

L. ETIENNE BALART (La. #24951) TAYLOR K. WIMBERLY (La. #38942) Jones Walker LLP 201 St. Charles Avenue – 48th Floor

New Orleans, LA 70170

Telephone: (504) 582-8584 Facsimile: (504) 589-8584 Email: ebalart@joneswalker.com

twimberly@joneswalker.com

Counsel for Respondents

{N4428323.1}

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2021, I caused the foregoing document to be served via the FTC's E-filing system and electronic mail to:

April Tabor
Acting Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580

The Honorable Michael Chappell Administrative Law Judge Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-110 Washington, DC 20580

> Thomas J. Widor Sanya Shahrasbi Federal Trade Commission Bureau of Consumer Protection 600 Pennsylvania Avenue, NW Mailstop CC-10232 Washington, DC 20506 twidor@ftc.gov sshahrasbi@ftc.gov

> > Complaint Counsel

/s/ L. Etienne Balart L. ETIENNE BALART

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X200041

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Joseph J. Simons, Chairman

Noah Joshua Phillips

Rohit Chopra

Rebecca Kelly Slaughter Christine S. Wilson

In the Matter of

TRAFFIC JAM EVENTS, LLC, a limited liability Company, and

DAVID J. JEANSONNE II, individually and as an Officer of TRAFFIC JAM EVENTS, LLC.

DOCKET NO. 9395

COMPLAINT COUNSEL'S INITIAL DISCLOSURES

Pursuant to Rule 3.31(b) of the Federal Trade Commission's Rules of Practice, Complaint Counsel hereby provides its mandatory initial disclosures to Respondents Traffic Jam Events, LLC and David J. Jeansonne II. 16. C.F.R. § 3.31(b).

1. Individuals and Entities Likely To Have Discoverable Information.

Complaint Counsel sets forth below the names and last known addresses and telephone numbers, if any, of individuals we currently believe are likely to have discoverable information relevant to the allegations of the Commission's complaint, to the proposed relief, or to the defenses of the Respondents.

Although Respondents already possess knowledge of the identities, addresses, and phone numbers of Traffic Jam Events' present or former officers, directors, employees, agents, or consultants, these disclosures identify the individuals affiliated with Respondent whom we currently understand may have discoverable and relevant information, including:

Name	Address	Telephone Number
David J. Jeansonne II	Traffic Jam Events, LLC 2232 Idaho Avenue Kenner, LA 70062	800-922-8109
Chad Bullock	Traffic Jam Events, LLC 2232 Idaho Avenue Kenner, LA 70062	800-922-8109
Justin Brophy	Traffic Jam Events, LLC 2232 Idaho Avenue Kenner, LA 70062	800-922-8109
William Lilley	Traffic Jam Events, LLC 2232 Idaho Avenue Kenner, LA 70062	800-922-8109
Mariela Everst	Traffic Jam Events, LLC 2232 Idaho Avenue Kenner, LA 70062	800-922-8109
James Whelan	Traffic Jam Events, LLC 2232 Idaho Avenue Kenner, LA 70062	800-922-8109

Clients of Defendant Traffic Jam Events advertising, marketing, and staffed event services, each of whom Defendants can more readily identify than Plaintiff, and each of whose addresses and telephone numbers Defendants likely have, including:

Name	Address	Telephone Number	
Michael Kastrenakes	MK Automotive, Inc.	(727) 475-5170	
	8000 Park Blvd N		
	Pinellas Park, FL 33781		
Mike Taylor	MK Automotive, Inc.	(727) 475-5170	
	8000 Park Blvd N		
	Pinellas Park, FL 33781		
Best Ford Inc.	579 Amherst Street	(603) 889-0161	
	Nashua, NH 03061		
Curbside Motors, Inc.	9915 South Tacoma Way	(253) 471-7575	
	Lakewood, WA 98499		

Dothan Chrysler Dodge	4074 Ross Clark Cir	(334) 794-0606
Jeep Ram FIAT	Dothan, AL 36303	
Ingram Park Mazda	7000 NW Loop 410	(210) 406-0122
	San Antonio, TX 78238	
Landers McLarty Toyota	2970 Huntsville Hwy	(931) 438-6300
	Fayetteville, TN 37334	
Landers McLarty Nissan	6520 University Dr. NW	(256) 203-8191
-	Huntsville, AL 35806	
Ram Country Chrysler	3611 US-90	(830) 282-0069
Dodge	Del Rio, TX 78842	

Third parties that have assisted, facilitated, or acted in concert or active participation with Respondents relating to their advertising, marketing, and staffed event services, each of whom Respondents can more readily identify than Complaint Counsel, and each of whose addresses and telephone numbers Respondents likely have, including:

Name	Address	Telephone Number
Platinum Plus Printing	701 6th Street NW	(320) 291-0491
_	Maple Lake, MN 55358	
Driven2Win	450 State Road 13 Ste	(904) 638-7200
	106	
	Saint Johns, FL 32259	
Lewis Color	30 Joe Kennedy Blvd	1-800-346-0371
	Statesboro, GA 30458	
MidAtlantic Printers	503 Third Street	(888) 231-3175
	Altavista, VA 24517	
ARD Printing Solutions,	5442 SW 149 th Court	(305) 552-5152
LLC	Miami, FL 33185	

Consumers targeted by Respondents' advertising and marketing, each of whom Respondents can more readily identify than Complaint Counsel, and each of whose addresses and telephone numbers Respondents likely have, including:

Name	Address Telephone Number		
Thomas Andrews	Brooksville, FL Unknown		
Ramon DeJesus	984 Middlesex Street, 2L	(978) 728-1348	
	Lowell, MA 01852		
Talisha Jackson	Unknown	(912) 602-9516	

Name	Address	Telephone Number	
Armandine Legare	1208 N. Bedell Avenue	(415) 424-2897	
_	Del Rio, TX 78840		
Will Manzer	2518 Jackson Street	(954) 667-9455	
	Hollywood, FL 33020		
Kyle Martin	3102 Carter Path	Unknown	
	Orlando, FL 34484		
Erin Richmond	79 Whittemore Road	Unknown	
	Londonderry, NH 03053		
John Roebuck	2425 King Oak Lane	Unknown	
	St. Cloud, FL 34769		
Edward Steinberger	4 Divinity Circle	Unknown	
	Nashua, NH 03063		
Juanita Van De Riet	11203 Prairie Spring Drive	(210) 699-8253	
	San Antonio, TX 78249		
Lewis Wilcox	7048 72nd Street N	(727) 686-6463	
	Pinellas Park, FL 33781		
Eric Wissenbach	34769 Orchid Parkway	(813) 774-2977	
	Dade City, FL 33523		
William Zehnpfund	2720 Lexington Street	(253) 582-7491	
	Steilacoom, WA 98388		

FTC investigator Kathleen Nolan, FTC paralegal Eleni Broadwell, former FTC paralegal Emilie Saunders, all of whom Respondents may contact through Complaint Counsel, are likely to have information relating to the practices at issue in the complaint.

We reserve the right to supplement this list from time to time, based on Respondents' initial disclosures or other information that may come to Complaint Counsel's attention during discovery. Further, pursuant to Rules 3.31(b)(2) and 3.31A, Complaint Counsel will disclose the identity of testifying experts, if any, as provided in the Scheduling Order, if any, to be entered in this matter.

2. Relevant Documents and Electronically Stored Information.

Pursuant to Rule 3.31(b)(2), Complaint Counsel provides the following "description by category and location of[] all documents and electronically stored information. . . in the

possession, custody, or control of the Commission or respondent(s) that are relevant to the allegations of the Commission's Complaint, to the proposed relief, or to the defenses of the respondent[,]" subject to the limitations set forth therein. 16 C.F.R. § 3.31(b)(2). The documents, electronically stored information, and tangible things ("documents") in the Commission's or the Bureau of Consumer Protection's possession, custody, or control that are relevant to the allegations asserted in the Complaint, the proposed relief, or Respondent's defenses fall into the following categories:

- Respondents' corporate filings;
- Respondents' advertisements and marketing materials;
- Consumer complaints;
- State enforcement actions concerning Defendants' advertising and marketing, including but not limited to actions taken by the states of Florida, Indiana, and Kansas; and
- Defendants' communications with its customers.

All such documents are maintained electronically. Copies of responsive documents are being produced to Respondents.

Complaint Counsel is without knowledge at this time as to the category and location of relevant documents in the possession, custody, or control of Respondents. Complaint Counsel believes that Respondents are generally in the possession of documents relevant to the allegations of the Commission's complaint, and anticipates that Respondents will provide this information as part of their mandatory initial disclosures.

Dated: September 3, 2020 Respectfully submitted,

Thomas J. Widor Sanya Shahrasbi Division of Financial Practices Federal Trade Commission 600 Pennsylvania Ave., NW, CC-10232

Washington, DC 20580 (202) 326-2709 (Shahrasbi) (202) 326-3039 (Widor)

/s/ Thomas J. Widor

sshahrasbi@ftc.gov, twidor@ftc.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of Complaint Counsel's Initial Disclosures has been forwarded to counsel for Respondents by email on September 3, 2020.

/s/ Thomas J. Widor

Brickman, Jennifer

From: Balart, Etienne

Sent: Tuesday, August 3, 2021 9:41 AM

To: Brickman, Jennifer

Subject: FW: [EXTERNAL] Fwd: Settlement

L. Etienne Balart | Partner

Jones Walker LLP

D: 504.582.8584 | M: 504.756.2192

ebalart@joneswalker.com

From: David Jeansonne <david@trafficjamevents.com>

Sent: Wednesday, May 12, 2021 9:22 AM **To:** Balart, Etienne <ebalart@joneswalker.com>

Subject: [EXTERNAL] Fwd: Settlement

David Jeansonne President

Traffic Jam EventsTM

a: 2232 Idaho Ave. | Kenner, LA 70062

e: david@trafficjamevents.com

w: trafficjamevents.com

m: <u>504-628-3339</u>

p: 800-922-8109 ext. 201

"We Only Live Once.....But If Done Right, Once Is Enough!!"

Begin forwarded message:

From: "Widor, Thomas" < twidor@ftc.gov > Date: May 12, 2021 at 9:20:04 AM CDT

To: David Jeansonne < david@trafficjamevents.com >, "Shahrasbi, Sanya"

<sshahrasbi@ftc.gov>, "Broadwell, Eleni" <ebroadwell@ftc.gov>

Cc: Jim Whelan < jimw@trafficjamevents.com>, Chad Bullock < chadb@trafficjamevents.com>,

Justin Brophy <justinb@trafficjamevents.com>

Subject: RE: Settlement

David, as we relayed on our call on Monday, we cannot get your proposed language to Section I approved. At this point, we'll continue to proceed with discovery and litigation. I understand Eleni has

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 8/3/2021 | Document No. 602103 | PAGE Page 12 of 32 * PUBLIC * started to receive some of the discovery responses from Justin. We'll follow up if there are any issues or questions.

Tom

From: David Jeansonne <david@trafficjamevents.com>

Sent: Tuesday, May 11, 2021 4:10 PM

To: Widor, Thomas <twidor@ftc.gov>; Shahrasbi, Sanya <sshahrasbi@ftc.gov>

Cc: Jim Whelan <jimw@trafficjamevents.com>; Chad Bullock <chadb@trafficjamevents.com>; Justin

Brophy < justinb@trafficjamevents.com>

Subject: Settlement

Tom,

It is in my best effort I am trying one last attempt to come to an agreement that doesn't put me out of Business.

Justin has sent the response discovery to the best of our ability, I will explain to the Judge why it's not with all that was requested.

I will Sign on behalf of Traffic Jam and put some very strong language in which it says I cannot do anything illegal.

Or, I will do the deal we originally agreed and both signed off on in December.

Anything short of that and I will be forced to retain a firm to represent me.

Thanks In advance for the consideration and effort.

David Jeansonne President Traffic Jam EventsTM

a: 2232 Idaho Ave. | Kenner, LA 70062

e: david@trafficjamevents.com

w: trafficjamevents.com

m: <u>504-628-3339</u>

p: 800-922-8109 ext. 201

"We Only Live Once.....But If Done Right, Once Is Enough!!"

Brickman, Jennifer

From: Balart, Etienne

Sent: Tuesday, August 3, 2021 10:01 AM

To: Brickman, Jennifer

Subject: FW: In the Matter of Traffic Jam Events, Do. 9395-- Deposition Notice

Attachments: 2021-05-18 TJE Deposition Notice.pdf

L. Etienne Balart | Partner

Jones Walker LLP

D: 504.582.8584 | M: 504.756.2192

ebalart@joneswalker.com

From: Shahrasbi, Sanya <sshahrasbi@ftc.gov>

Sent: Tuesday, May 18, 2021 4:58 PM

To: David Jeansonne <david@trafficjamevents.com>

Cc: Widor, Thomas <twidor@ftc.gov>; Broadwell, Eleni <ebroadwell@ftc.gov> **Subject:** In the Matter of Traffic Jam Events, Do. 9395-- Deposition Notice

David,

Please find attached deposition notices for Traffic Jam Events. I'm also pasting the time and dates we are proposing here:

Deponent Name	Date and Time	Location
Everst, Mariela	June 8, 2021, at 9:00 a.m. CST	The deposition will be conducted remotely
Brophy, Justin	June 11, 2021, at 9:00 a.m. CST	The deposition will be conducted remotely
Bullock, Chad	June 15, 2021, at 9:00 a.m. CST	The deposition will be conducted remotely
Whelan, James "Jim"	June 17, 2021, at 9:00 a.m. CST	The deposition will be conducted remotely
Jeansonne II, David J.	June 22, 2021, at 9:00 a.m. CST	The deposition will be conducted remotely

Please let us know by the end of the week if those dates work for Respondents and your employees and officers.

Please also let us know if you are willing to stipulate to remote depositions, or if you do not oppose us filing a motion with Judge Chappell under the rules.

Thanks,

Sanya S.

Sanya Shahrasbi

Attorney Federal Trade Commission-Division of Financial Practices 600 Pennsylvania Ave NW, CC-10218 Washington, D.C. 20580 (202) 326-2709



X200041

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

TRAFFIC JAM EVENTS, LLC, a limited liability company, and

DAVID J. JEANSONNE II, individually and as an officer of TRAFFIC JAM EVENTS, LLC.

DOCKET NO. 9395

COMPLAINT COUNSEL'S NOTICE OF DEPOSITION TO TRAFFIC JAM EVENTS, LLC.

PLEASE TAKE NOTICE, that pursuant to the Federal Trade Commission's Rules of Practice for Adjudicative Proceedings (16 C.F.R. § 3.31 *et seq.*) and Rule 3.33(a) (16 C.F.R. § 3.33(a)), Complaint Counsel will take the deposition of the individuals listed below. The deposition will be conducted before a person authorized to administer oaths and will be recorded by stenographic means.

Deponent Name	Date and Time	Location
Everst, Mariela	June 8, 2021, at 9:00 a.m. CST	The deposition will be
		conducted remotely
Brophy, Justin	June 11, 2021, at 9:00 a.m. CST	The deposition will be
		conducted remotely
Bullock, Chad	June 15, 2021, at 9:00 a.m. CST	The deposition will be
		conducted remotely
Whelan, James	June 17, 2021, at 9:00 a.m. CST	The deposition will be
"Jim"		conducted remotely
Jeansonne II, David	June 22, 2021, at 9:00 a.m. CST	The deposition will be
J.		conducted remotely

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

May 18, 2021

By: <u>/s/ Sanya Shahrasbi</u>

Sanya Shahrasbi Federal Trade Commission Bureau of Consumer Protection 600 Pennsylvania Avenue, NW Mailstop CC-10232 Washington, DC 20506

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2021, I caused the foregoing document to be served via electronic mail to:

David J. Jeansonne II President Traffic Jam Events, LLC 2232 Idaho Ave. Kenner, LA 70062 david@trafficjamevents.com

May 18, 2021 By: <u>/s/ Sanya Shahrasbi</u> Sanya Shahrasbi

Sanya Shahrasbi Federal Trade Commission Bureau of Consumer Protection

Brickman, Jennifer

From: Widor, Thomas <twidor@ftc.gov>
Sent: Monday, July 19, 2021 7:24 PM

To: Balart, Etienne

Cc: Broadwell, Eleni; Shahrasbi, Sanya; 'David Jeansonne'; Wimberly, Taylor; Brickman,

Jennifer; Tankersley, Michael

Subject: [EXTERNAL] RE: Docket No., 9395, In re Traffic Jam Events, LLC et al., Third Party

Subpoena -- Justin Brophy

Attachments: Subpoena to Testify at a Deposition_Justin Brophy.pdf

Categories: Saved to Worldox

Etienne,

We intend to notice Justin Brophy's deposition. Before sending it tomorrow, we wanted to confer about your availability but we intend to have the Secretary's office issue subpoena for next Tuesday as a placeholder given Mr. Brophy's refusal to respond to us. Please let us know if next Tuesday at 10am EST works or please propose other dates next week.

Tom W.

Thomas J. Widor Attorney, Division of Financial Practices Bureau of Consumer Protection Federal Trade Commission 600 Pennsylvania Avenue, NW Mail Stop: CC-10232 Washington, DC 20580 Phone: (202) 326-3039 Fax: (202) 326-3768

Fax: (202) 326-37 twidor@ftc.gov

RADE COMMISS SUPPOSETTACE TORY FOR THEIR LIFTY LA TURBUL TO THE STATE OF 12 * PUBLIC *

Provided by the Secretary of the Federal Trade Commission, and Issued Pursuant to Rule 3.34(a), 16 C.F.R. § 3.34(a) (2010)

1. TO 2. FROM

Justin Brophy 2 Norz Drive Hillsborough, NJ 08844

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This subpoena requires you to appear and give testimony at the taking of a deposition, at the date and time specified in Item 5, and at the request of Counsel listed in Item 8, in the proceeding described in Item 6.

3. PLACE OF DEPOSITION

4. YOUR APPEARANCE WILL BE BEFORE
Thomas Widor or designee

5. DATE AND TIME OF DEPOSITION
July 27, 2021, at 10:00AM (Eastern Standard Time)

6. SUBJECT OF PROCEEDING

In the Matter of Traffic Jam Events, LLC and David J. Jeansonne II, Docket No. 9395

7. ADMINISTRATIVE LAW JUDGE

The Honorable D. Michael Chappell

Federal Trade Commission Washington, D.C. 20580

8. COUNSEL AND PARTY ISSUING SUBPOENA

Thomas Widor Federal Trade Commission 400 7th St SW Washington, DC 20024 (202) 326-3039

DATE SIGNED

SIGNATURE OF COUNSEL ISSUING SUBPOENA

INSTRUCTIONS AND NOTICES

The delivery of this subpoena to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. This subpoena does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this subpoena be filed within the earlier of ten days after service thereof or the time for compliance therewith. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 8.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

TRAVEL EXPENSES

Use the enclosed travel voucher to claim compensation to which you are entitled as a witness for the Commission. The completed travel voucher and this subpoena should be presented to Commission Counsel for payment. If you are permanently or temporarily living somewhere other than the address on this subpoena and it would require excessive travel for you to appear, you must get prior approval from Commission Counsel. Witness travelers can contact the FTC travel office for guidance at (202) 326-3299 or travel@ftc.gov. PLEASE NOTE: Reimbursement for necessary transportation, lodging, and per diem expenses cannot exceed the maximum allowed for such expenses by an employee of the federal government.

A copy of the Commission's Rules of Practice is available online at http://bit.ly/FTCsRulesofPractice. Paper copies are available upon request.

FTC Form **70-C** (rev. 10/2020)

RETURN OF SERVICE

	I hereby certify that a duplicate original of the within subpoena was duly served: (check the method used) n person.
⊙ b	y registered mail.
0	by leaving copy at principal office or place of business, to wit:
	on the person named herein on:
-	(Month, day, and year)
_	
	(Name of person making service)
_	(Official title)







Justin Brophy

Graphic Designer with 10 years full-time experience

Hillsborough, New Jersey, United States · 36 connections

Join to Connect



Self-employed



Rochester Institute of Technology



Portfolio 2

About

I am currently searching for a new Graphic Designer opportunity. Experience includes print (direct mail flyers, postcards, magazines) and digital (websites, e-mail marketing) design. I also have a Bachelor or Fine Arts degree in Illustration from the Rochester Institute of Technology.

Specialties: Adobe Creative Suite (Illustrator, InDesign, Photoshop, Acrobat, Muse), Illustration, Graphic Design, Direct Mail, Print Design, Web Design, E-mail Marketing, Logos, Advertising, Microsoft Office (Word, Powerpoint, Excel), WordPress.

Experience









Lead Graphic Designer

Traffic Jam Events, LLC

Sep 2010 - May 2021 · 10 years 9 months

Created print, branding and web designs using the Adobe Creative Suite for one of the nation's top automotive advertising firms.



Graphic Designer

R.I.T. Sportszone

Jan 2003 - May 2006 · 3 years 5 months

Worked in a marketing team to create advertisements and marketing products for a sports television program.

Designed posters, logos, t-shirts, table tents, and calendars under the supervision of both an Art Director and Producer.

Created graphics and illustrations to be used in other team member's poster designs.

Education



Rochester Institute of Technology

Bachelor of Fine Arts · Illustration

2002 - 2006

Activities and Societies: Society of Illustrators Guild

Concentration in Japanese Language & Culture

Graduated with Honors (3.5 GPA)

Achieved Dean's List nine semesters

Received R.I.T. Presidential Scholarship

Selected for Senior Exhibition at Gallery R, Rochester, NY

View Justin's full profile

© See who you know in common





Join to view full profile

People also viewed



David Scott Myers

Graphic Artist and workshop host at Red Wizard Collage Buffalo, NY



Andrew Snow

End User Computing Analyst III at Office Depot HQ Boca Raton, FL



Josh Lehrer

Leica Specialist at Leica Store Miami North Miami Beach, FL



CoCo Boardman

Owner

Greater Syracuse-Auburn Area



Erin Lund

Creative Consultant

Rochester, NY



Amy White

Vice President, Marketing | Empowering Leader | Analytical Thinker | Strategy Achiever Westchester County, NY



Elise Lloyd

Illustrator

Los Angeles Metropolitan Area



Carly Schonberg

Senior UI Designer at Bevy • Climate Designers NYC Chapter Co-Lead New York City Metropolitan Area



Phillip Sun

Talent Agent at William Morris Endeavor

Beverly Hills, CA



Trevor Winters





Show more profiles ~

Others named Justin Brophy



Justin Brophy

Operations Manager at Wescape Fruit & Bottle Wrappers City of Cape Town



Justin Brophy

Consultant Psychiatrist at Practitioner Health Matters Ireland



Justin Brophy

Senior DevOps Engineer at Privo Greater Savannah Area



Justin Brophy

New Glasgow, NS

23 others named Justin Brophy are on LinkedIn

See others named Justin Brophy

Add new skills with these courses



Margo Chase's Hand-Lettered Poster: Start to Finish



Creating an Interactive PDF Magazine



Cert Prep: Adobe Certified Associate - InDesign

See all courses

Justin's public profile badge

Include this LinkedIn profile on other websites

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 8/3/2021 | Document No. 602103 | PAGE Page 24 of 32 * PUBLIC *

in

Justin Brophy





Graphic Designer at Self-employed



Rochester Institute of Technology

View profile

Linked in

View profile badges

© 2021

Accessibility

Privacy Policy

Copyright Policy

Guest Controls

Language

About

User Agreement

Cookie Policy

Brand Policy

Community Guidelines



Log In

Justin Brophy City All States View Records

BeenVerified > People Search > Broadway to Brown > Brophy to Bros > Justin Brophy



Justin Brophy Directory in the US

We found 12 records in 14 states for Justin Brophy in our US directory. The top state of residence is North Carolina, followed by Ohio. The average Justin Brophy is around 36 years of age with around 71% falling in to the age group of 21-40. Search Justin Brophy names directory to see where they may live as well as their possible previous & current home addresses, cell phones, email addresses, background report, social profiles, professional history and more.

View Public Record Results

Filter by Age ^
21-40 (5)
41-60 (2)

Filter by State ^
Arkansas (1)
Connecticut (1)
Florida (1)

Log In

View Records Justin **Brophy** City **All States** Pennsylvania (1) Virginia (1) **PUBLIC RECORDS Phone Search Email Search Address Search People Search Popular Topics Property Search Public Records** View Profile

Justin M Brophy | East Windsor, New Jersey

Age: 36

Phone Number: 813-475-6897

Addresses: 45 Rocky Brook Rd, East Windsor, NJ; 11110 Roseate Dr, Tampa, FL; 2 Norz Dr, Hillsborough, NJ

Relatives: John M Brophy, Kimberly Feitl, Kimberly A Brophy

Previous Locations: Rochester, NY

Justin D Brophy | West Chester, Pennsylvania

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Phone Number: 508-981-9756, 978-355-2847

Addresses: 90 Ruggles Ln. Barre. MA

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View Records Justin **Brophy** City **All States** Previous Locations: Glen Mills, PA; Havertown, PA Justin Brophy | Charlotte, North Carolina View Profile Age: 35 **Phone Number:** 330-374-6818, 330-217-1240, 234-678-6965 Addresses: 1920 Sharon Oaks Ln Apt 102, Charlotte, NC; 4411 Kiddle Ln, Monroe, NC; 2022 Adelaide Blvd, Akron, OH Relatives: Kyle Brophy, Vickie L Brophy, Sue E Brophy **Email:** @aol.com, @yahoo.com **Justin Brophy** | Taylorsville, North Carolina View Profile Age: 30 Phone Number: 828-471-5173, 828-352-9007 Addresses: 114 Gina Ln, Taylorsville, NC; 2401 Section House Rd, Hickory, NC Relatives: Joshua Brophy, Elizabeth Wilson, Evelyn M Brophy Email: @yahoo.com, @gmail.com **Social Profiles:** Twitter **Justin Brophy** | Barre, Massachusetts View Profile

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View Records Justin **Brophy** City **All States** FIIUHE MUHIDEL. / U4-ZU/-4Z/I Addresses: 143 Friendly Church Rd, Taylorsville, NC **Email:** @yahoo.com **Justin Brophy** | De Queen, Arkansas View Profile Phone Number: 479-434-3332 Addresses: Po Box 202, De Queen, AR; 5100 S Oth St, Fort Smith, AR Relatives: Mike W Brophy, James R Brophy, Misty R Brophy Justin Brophy | Fredericksburg, Virginia View Profile Addresses: 700 Cobblestone Blvd Apt 410, Fredericksburg, VA; 20 Boggs Hill Rd, Newtown, CT Relatives: L Brophy, Laura J Brophy, Todd J Brophy Email: @earthlink.net, @netzero.net **Social Profiles:** Twitter

Justin A Brophy | Portage, Michigan

View Profile

Phone Number: 440-833-6014

Addresses: 2107 Stanley Ave, Portage, MI; 1111 S Edgerton St Apt 105, Mitchell, SD; 30951 Lake Shore Blvd Apt 861, Wil

Relatives: Jason Brophy, Mark A Brophy, Hazel K Brophy

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Justin Brophy City All States View Records

EIIIaII. WIIISH.COIII, WHOUHIAH.COIII

Work Email: @qwest.com

Justin E Brophy | Ontario, California

Age: 37

Phone Number: 909-986-4209

Addresses: 646 E Yale St, Ontario, CA

Relatives: Alfred A Brophy, Carol A Brophy, Tiffany Brophy

Justin P Brophy | Brea, California

Age: 42

Phone Number: 714-203-1472

Addresses: 3086 E Santa Fe Rd, Brea, CA; 3086 Santa Fe Rd, Brea, CA; 388 Gullotti Pl, Placentia, CA

Relatives: Monica Patino, Patricia A Brophy, Ryan D Brophy

Email: @hotmail.com

63 Seen As: Justin Paul Brophy

Previous Locations: Irvine, CA; Newport Beach, CA; Rancho Cucamonga, CA



Public records available for people named Justin Brophy

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Justin Brophy Instagram Accounts

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FAQ: Learn more about our top result for Justin Brophy

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View Records Justin **Brophy** City **All States**

Justin Brophy's phone number is 610-399-4503.

What is Justin Brophy's age?

Justin Brophy is 41 years old.

What is Justin Brophy's email address?

Justin Brophy's email address is asminguettesfoot@aol.com. We have 5 additional emails on file for Justin.

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