

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

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

Plaintiffs,

v.

Case No: 6:14-cv-8-Orl-41DAB

**WORLDWIDE INFO SERVICES, INC.,
ELITE INFORMATION SOLUTIONS
INC., ABSOLUTE SOLUTIONS GROUP
INC., GLOBAL INTERACTIVE
TECHNOLOGIES, INC., GLOBAL
SERVICE PROVIDERS, INC., LIVE
AGENT RESPONSE 1 LLC, ARCAGEN,
INC., AMERICAN INNOVATIVE
CONCEPTS, INC., UNIQUE
INFORMATION SERVICES INC.,
MICHAEL HILGAR, GARY MARTIN,
JOSEPH SETTECASE, NATIONAL
LIFE NETWORK INC. and YULUISA
NIEVES,**

Defendants.

ORDER AND PERMANENT INJUNCTION

THIS CAUSE is before the Court on the Joint Motion for Entry of Stipulated Order for Permanent Injunction and Other Equitable Relief (the “Motion for Permanent Injunction”) filed on October 27, 2014. (Doc. 97). For the reasons stated therein, the Motion for Permanent Injunction will be granted, and this Court will enter the Stipulated Permanent Injunction (Doc. 97-1), which also awards monetary relief, as part of this Order.

Plaintiffs, the Federal Trade Commission (“FTC” or “Commission”) and the State of

Florida, Office of the Attorney General, Department of Legal Affairs (“State of Florida”), filed their First Amended Complaint for Permanent Injunction and Other Equitable Relief (“First Amended Complaint”) in this matter, pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 53(b) and 57b, the Telemarketing and Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108, and the Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”), Chapter 501, Part II, Florida Statutes (2013). Plaintiffs and Defendants Worldwide Info Services, Inc., Elite Information Solutions Inc., Absolute Solutions Group Inc., Global Interactive Technologies, Inc., Global Service Providers, Inc., Arcagen, Inc., American Innovative Concepts, Inc., Unique Information Services Inc., National Life Network Inc., Michael Hilgar, Gary Martin, Joseph Settecase, and Yuluisa Nieves (collectively, “Stipulating Defendants”) stipulate to the entry of the Permanent Injunction to resolve all matters in dispute in this action between them.

Therefore, it is **ORDERED** and **ADJUDGED** as follows:

1. The Motion for Permanent Injunction (Doc. 97) filed on October 27, 2014, is **GRANTED**.
2. This Court makes the following findings:
 - a. This Court has jurisdiction over this matter.
 - b. The First Amended Complaint charges that Stipulating Defendants participated in deceptive acts and practices that violate Section 5(a) of the FTC Act, 15 U.S.C. § 45(a); various provisions of the Telemarketing Sales Rule (“TSR”), 16 C.F.R. Part 310; and Section 501.204 of the FDUTPA, Chapter 501, Part II, Florida Statutes, in the advertising, marketing, promoting, offering for sale, or selling of medical alert systems.

- c. Stipulating Defendants neither admit nor deny any of the allegations in the First Amended Complaint, except as specifically stated in this Order. Only for purposes of this action, Stipulating Defendants admit the facts necessary to establish jurisdiction.
 - d. Stipulating 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 fees.
 - e. Stipulating Defendants waive all rights to appeal or otherwise challenge or contest the validity of this Order.
3. For purposes of the Permanent Injunction and Monetary Relief, which is included below, the following definitions apply:
- a. “Corporate Defendants” means Worldwide Info Services, Inc., also d/b/a The Credit Voice; Elite Information Solutions Inc., also d/b/a The Credit Voice; Absolute Solutions Group Inc., also d/b/a The Credit Voice; Global Interactive Technologies, Inc., also d/b/a The Credit Voice; Global Service Providers, Inc.; Live Agent Response 1 LLC, also d/b/a LAR; Arcagen, Inc., also d/b/a ARI; American Innovative Concepts, Inc.; Unique Information Services Inc.; and National Life Network Inc., and their successors and assigns, as well as any subsidiaries, and any fictitious business entities or business names created or used by these entities, or any of them.
 - b. “Defendants” means all of the Individual Defendants and the Corporate

Defendants, individually, collectively, or in any combination.

- c. “Individual Defendants” means Michael Hilgar, Gary Martin, Joseph Settecase, and Yuluisa Nieves, and by whatever other names each may be known.
- d. “Person” includes 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.
- e. “Plaintiffs” means the Federal Trade Commission (“FTC” or “Commission”) and the State of Florida.
- f. “Stipulating Corporate Defendants” or “Stipulating Receivership Defendants” means Worldwide Info Services, Inc., also d/b/a The Credit Voice; Elite Information Solutions Inc., also d/b/a The Credit Voice; Absolute Solutions Group Inc., also d/b/a The Credit Voice; Global Interactive Technologies, Inc., also d/b/a The Credit Voice; Global Service Providers, Inc.; Arcagen, Inc., also d/b/a ARI; American Innovative Concepts, Inc.; Unique Information Services Inc.; and National Life Network Inc., and their successors and assigns, as well as any subsidiaries, and any fictitious business entities or business names created or used by these entities, or any of them.
- g. “Telemarketing” means any plan, program, or campaign which is conducted to induce the purchase of goods or services by use of one or more telephones, and which involves a telephone call, whether or not covered by

the Telemarketing Sales Rule.

4. It is further **ORDERED** that the following Permanent Injunction and Monetary Relief is entered:

PERMANENT INJUNCTION AND MONETARY RELIEF

I. BAN ON ROBOCALLS

Stipulating Defendants are permanently restrained and enjoined from initiating, or causing others to initiate, any telephone call that delivers a prerecorded message.

II. BAN ON TELEMARKETING

Stipulating Defendants are permanently restrained and enjoined from participating in telemarketing, whether directly or through an intermediary.

III. BAN ON MARKETING MEDICAL ALERT PRODUCTS OR SERVICES

Stipulating Defendants are permanently restrained and enjoined from advertising, marketing, promoting, or offering for sale, or assisting in the advertising, marketing, promoting, or offering for sale of, any medical alert product or service.

IV. PROHIBITION AGAINST MISREPRESENTATIONS

Stipulating Defendants, their officers, agents, servants, 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, promoting, or offering for sale of any good or service, are permanently restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication:

1. That a good or service has already been purchased for the consumer by a friend, family member, or other acquaintance;

2. That a good or service is endorsed by any organization or agency;
3. When a consumer will be charged for a good or service; and
4. Any other fact material to consumers concerning any good 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.

V. MONETARY JUDGMENT AND PARTIAL SUSPENSION

A. The Clerk is directed to enter a judgment in favor of Plaintiffs against Stipulating Defendants, jointly and severally, in the amount of \$22,989,609.00.

B. Defendants Hilgar and Settecase are ordered to pay to the Commission \$24,000, which, as Defendants Hilgar and Settecase stipulate, their undersigned counsel holds in escrow for no purpose other than payment to the Commission. Such payment must be made within 7 days of entry of this Order by electronic fund transfer in accordance with instructions previously provided by a representative of the Commission. Upon such payment and the satisfaction of all obligations set forth in Subsections C through E below, the remainder of the judgment is suspended as to all Stipulating Defendants, subject to the Subsections below.

C. Defendant Hilgar is ordered, within seven (7) days of the date of entry of this Order, to surrender to the lienholder or take specific steps, as set forth below, to sell all interests in the 2008 BMW 328i (VIN WBAVA37518NL50335) (hereinafter, "BMW"), identified in the January 22, 2014 financial statement provided by Defendant Hilgar to the FTC:

1. Defendant Hilgar shall immediately sell the BMW at fair market value (based on its Kelley Blue Book value) by advertising it for sale through an online auction service and selling it to the highest bidder, or by placing the

- BMW for sale through an appropriate broker or automobile listing service;
2. Before placing an ad or otherwise listing the BMW for sale, and before accepting a bid or offer, Defendant Hilgar shall provide to the Commission documentation for the proposed sale price and for any and all bids or offers received;
 3. Defendant Hilgar shall in no way profit directly or indirectly from the sale of the BMW, including by sharing in any sales commission or fee, or by receiving anything of value of any kind;
 4. Pending sale of the BMW, Defendant Hilgar shall: a) maintain the BMW in good working order and in the same condition as of January 22, 2014, the date Defendant signed his sworn financial statement; b) take no action to encumber or diminish its value; c) maintain existing insurance coverage for the BMW; and d) remain current on any tax, registration, maintenance costs, and other fees and expenses related to the BMW; and
 5. Within three (3) business days of receipt of the net proceeds from the sale of all interests in the BMW, Defendant Hilgar shall cause to be wired to the Commission the net proceeds from the sale in accordance with instructions provided by the Commission, and shall identify the name, address and telephone number of the purchaser of the BMW.

D. Defendant Martin is ordered, within seven (7) days of the date of entry of this Order, to transfer possession of the 1984 Hans Christian 33T (hereinafter, "Boat") identified in the January 22, 2014 financial statement provided by Defendant Martin to the FTC, to the Receiver. The Receiver is authorized and directed to promptly liquidate the Boat without further order of

this Court and to pay from the proceeds of the sale any remaining loan balance on the Boat. Defendant Martin is ordered to take all steps necessary to assist the Receiver in the sale of the Boat and shall not add any encumbrances to the Boat. In the event that it is necessary for Defendant Martin to execute documents to facilitate the liquidation of the Boat, Defendant Martin is ordered to execute such documents within three (3) days of a request from the Commission or the Receiver. Defendant Martin is ordered to keep the Boat in good repair and to timely pay all registration fees, loan payments, and all other attendant expenses related to the maintenance and ownership of the Boat until it is liquidated by the Receiver as required by this Subsection V.D.

E. Defendant Settecase is ordered, within seven (7) days of the date of entry of this Order, to transfer possession of the 2004 Mercedes SL-500 (VIN WDBSK75F04F084055) and 2008 Lincoln Navigator (VIN 5LMFU27528LJ21515) (hereinafter, "Vehicles") identified in the January 21, 2014 financial statement provided by Defendant Settecase to the FTC, to the Receiver. The Receiver is authorized and directed to promptly liquidate the Vehicles without further order of this Court and to pay from the proceeds of the sale any remaining loan balance on the Vehicles. Defendant Settecase is ordered to take all steps necessary to assist the Receiver in the sale of the Vehicles and shall not add any encumbrances to the Vehicles. In the event that it is necessary for Defendant Settecase to execute documents to facilitate the liquidation of any of the Vehicles, Defendant Settecase is ordered to execute such documents within three (3) days of a request from the Commission or the Receiver. Defendant Settecase is further ordered to maintain insurance on the Vehicles in amounts of not less than the full replacement value of the Vehicles until the Vehicles are liquidated by the Receiver pursuant to this Subsection V.E. In the event that any of the Vehicles suffers any loss or damage covered by such insurance policy, Defendant Settecase is ordered to make such claims that are permitted by the insurance policy and assign or

remit any insurance payment he receives as a result of such loss or damage to the Commission. Defendant Settecase is ordered to keep the Vehicles in good repair and to timely pay all registration fees, loan payments, and all other attendant expenses related to the maintenance and ownership of the Vehicles until they are liquidated by the Receiver as required by this Subsection V.E.

F. Plaintiffs' agreement to the suspension of part of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of Stipulating Defendants' sworn financial statements and related documents submitted to the Commission, namely:

1. The Financial Statement of Individual Defendant Michael Hilgar signed on January 22, 2014;
2. The Financial Statement of Individual Defendant Gary Martin signed on January 22, 2014;
3. The Financial Statement of Individual Defendant Joseph Settecase signed on January 21, 2014, including the attachments; and
4. The Financial Statement of Individual Defendant Yuluisa Nieves signed on May 21, 2014.

G. The suspension of the judgment will be lifted as to any Stipulating Defendant if, upon motion by the Commission, the Court finds that the Stipulating 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.

H. If the suspension of the judgment is lifted, the judgment becomes immediately due as to that Stipulating Defendant in the amount specified in Subsection A above (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.

VI. SECOND MONETARY JUDGMENT AS TO DEFENDANT JOSEPH SETTECASE

A. The Clerk is directed to enter a judgment (hereinafter “Settecase Contempt Judgment”) in favor of Plaintiffs against Joseph Settecase in the amount of \$39,300.00.

B. No portion of any funds or assets turned over to Plaintiffs pursuant to Section V will pay down the Settecase Contempt Judgment.

VII. ADDITIONAL MONETARY PROVISIONS

A. Stipulating Defendants must 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 First Amended Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of Plaintiffs, including in a proceeding to enforce their rights 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 First Amended Complaint establish all elements necessary to sustain an action by Plaintiffs 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. Stipulating Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Numbers or Employer Identification Numbers), which Stipulating 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. All money paid to Plaintiffs pursuant to this Order may be deposited into a fund administered by the Commission or its designee on behalf of both the Commission and the State of Florida. This fund shall 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 Stipulating Defendants' practices alleged in the First Amended Complaint, relinquish its authority over any portion of the joint monies not used for equitable relief to the State of Florida, or both. Stipulating Defendants shall have no right to challenge the Commission's choice of remedies under this Section. Stipulating Defendants shall have no right to contest the manner of distribution chosen by the Commission and the State of Florida.

F. All joint funds not used for the equitable relief described in Paragraph M of this Section ("remaining joint funds") shall be distributed among the Commission and the State of Florida in the following manner:

1. The State of Florida shall be reimbursed for the costs and fees it incurred in this matter including, but not limited to, its costs of investigation and litigation, after which
2. All remaining joint funds shall be divided equally between the Commission and the State of Florida.

G. The freeze on Stipulating Defendants' assets pursuant to Section III of the Stipulated Preliminary Injunction entered in this action is modified to permit the transfers specified above in Section V.B through E. Upon the satisfaction of the payment required by Subsection V.B

and the sale or return of the BMW required by Section V.C, the asset freeze as to Defendant Hilgar is dissolved. Upon completion of the sale of the Boat required by Section V.D, the asset freeze as to Defendant Martin is dissolved. Upon the satisfaction of the payment required by Subsection V.B, the sale of the Vehicles required by Section V.E, and the satisfaction of the Settecase Contempt Judgment required by Section VI.A, the asset freeze as to Defendant Settecase is dissolved. Upon entry of this Order, the asset freeze as to Defendant Nieves is dissolved. A financial institution shall be entitled to rely upon a letter from the Commission stating that the freeze on a Defendant's assets has been lifted.

VIII. PROHIBITIONS REGARDING CONSUMER INFORMATION

Stipulating defendants, their officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, are permanently restrained and enjoined from directly or indirectly:

A. Failing to provide sufficient customer information to enable the Commission to efficiently administer consumer redress. If a representative of the Commission requests in writing any information related to redress, 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 any Defendant obtained prior to entry of this Order in connection with the advertising, marketing, promoting, or offering for sale of medical alert systems; and

C. Failing to destroy such customer information in all forms in their possession,

custody, or control within thirty (30) days after receipt of written direction to do so from a representative of Plaintiffs.

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.

IX. RECEIVERSHIP

The appointment of Robb Evans & Robb Evans and Associates, LLC, as Permanent Equity Receiver (“Receiver”) for Stipulating Receivership Defendants and any of their affiliates, subsidiaries, divisions, or sales or customer service operations, wherever located, with the full power of an equity receiver, entered on January 7, 2014, is hereby continued in full force and effect except as modified in this Section. The Receiver shall complete liquidation of all assets of Stipulating Receivership Defendants. Once the Receiver has completed liquidation of these assets, and satisfied his obligations under Section V.D and E of this Order, the Receiver shall submit his final report and application for fees and expenses, including such administrative fees incurred pursuant to the Receiver’s performance of his obligations under Section V.D and E, and upon approval of the same by the Court, shall pay any remaining funds to the Commission. Upon the Court’s approval of the Receiver’s final report as to Stipulating Receivership Defendants, and the payment of any remaining funds to the Commission under this Section, the Receivership over Stipulating Receivership Defendants shall be terminated.

X. COOPERATION WITH THE RECEIVER

Stipulating Defendants, their officers, agents, servants, 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, shall fully cooperate with and assist the

Receiver. This cooperation and assistance shall include, but not be limited to providing any information to the Receiver that the Receiver deems necessary to exercising the authority and discharging the responsibilities of the Receiver under this Order.

XI. ORDER ACKNOWLEDGEMENTS

Stipulating Defendants must submit acknowledgments of receipt of this Order:

A. Each Stipulating Defendant, 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, each Individual Defendant for any business that such Defendant, individually or collectively with any other Defendant, is the majority owner or controls directly or indirectly, and each Stipulating Corporate Defendant, 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 this 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 a Stipulating Defendant delivered a copy of this Order, that Stipulating Defendant must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

XII. COMPLIANCE REPORTING

Stipulating Defendants make timely submissions to the Commission:

A. One year after entry of this Order, each Stipulating Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Stipulating Defendant 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 Stipulating Defendant; (b) identify all of that Stipulating 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 Individual 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.

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

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

1. Each Stipulating Defendant must report any change in: (a) any designated point of contact; or (b) the structure of any Corporate Defendant or any entity that Stipulating 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.

2. Additionally, each Individual Defendant must report any change in: (a) name, including aliases or fictitious name, or residence address; or (b) title or role in any business activity, including any business for which such Individual Defendant performs services whether as an employee or otherwise and any entity in which such Individual Defendant has any ownership interest, and identify the name, physical address, and Internet address of the business or entity.

C. Each Stipulating Defendant must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such 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. Worldwide Info Services, Inc., et al.*, FTC Matter No. X140013.

XIII. RECORDKEEPING

Stipulating Defendants must create certain records for ten (10) years after entry of the Order, and retain each such record for 5 years. Specifically, Stipulating Corporate Defendants and each Individual Defendant for any business that such Defendant, individually or collectively with any other Defendant, is a majority owner or controls directly or indirectly, 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, and 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.

XIV. COMPLIANCE MONITORING

For the purpose of monitoring Stipulating 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 any Plaintiff, each Stipulating 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. 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.

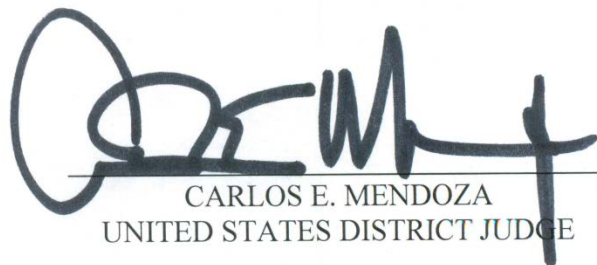
B. For matters concerning this Order, Plaintiffs are authorized to communicate directly with each Stipulating Defendant. Stipulating Defendants must permit representatives of Plaintiffs to interview any employee or other person affiliated with any Stipulating Defendant who has agreed to such an interview.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

C. Plaintiffs may use all other lawful means, including posing, through its representatives, as consumers, suppliers, or other individuals or entities, to Stipulating Defendants or any individual or entity affiliated with Stipulating 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.

XV. RETENTION OF JURISDICTION

This Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

DONE and **ORDERED** in Orlando, Florida on November 13, 2014.



CARLOS E. MENDOZA
UNITED STATES DISTRICT JUDGE

Copies furnished to:

Counsel of Record
Unrepresented Parties