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16 UNITED STATES DISTRICT COURT
 17 CENTRAL DISTRICT OF CALIFORNIA

18 UNITED STATES OF) 19 AMERICA,) 20 Plaintiff,) 21 v.) 22 RESPONSE TREE LLC, a) 23 California corporation; and) 24) 25 DEREK THOMAS DOHERTY,) 26 individually and as an officer of) 27 RESPONSE TREE LLC,) 28) Defendants.)	Case No. 8:24-CV-1 STIPULATION AS TO ENTRY OF ORDER FOR PERMANENT INJUNCTION, CIVIL PENALTY JUDGMENT, AND OTHER RELIEF
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1 Plaintiff, the United States of America, acting upon notification and
2 authorization to the Attorney General by the Federal Trade Commission
3 (“Commission” or “FTC”), filed its Complaint for Permanent Injunction, Civil
4 Penalties, and Other Relief (“Complaint”) pursuant to Sections 5(a), 5(m)(1)(A),
5 13(b), 16(a), and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C.
6 §§ 45(a), 45(m)(1)(A), 53(b), 56(a), and 57b; the Telemarketing and Consumer
7 Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. § 6105; and the
8 FTC’s Telemarketing Sales Rule (the “TSR”), as amended, 16 C.F.R. Part 310.
9 Plaintiff and Defendants, Response Tree LLC and Derek Thomas Doherty,
10 stipulate to the entry of a Stipulated Order for Permanent Injunction, Civil Penalty
11 Judgment, and Other Relief (“Stipulated Order”) to resolve all matters in dispute in
12 this action between them.

13 Plaintiff and Defendants have agreed to entry of the Stipulated Order
14 (lodged concurrently with this Stipulation) to resolve all claims against Defendants
15 in this action. Plaintiff and Defendants have consented to entry of the Stipulated
16 Order without trial or adjudication of any issue of law or fact herein.

17 Plaintiff and Defendants hereby stipulate to entry of a Stipulated Order for
18 Permanent Injunction, Civil Penalty Judgment, and Other Relief with the following
19 terms:

20 I. FINDINGS

21 1. This Court has jurisdiction over this matter.
22 2. The Complaint charges that Defendants participated in deceptive acts
23 or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, and the
24 Telemarketing Sales Rule (the “TSR” or “Rule”), as amended, 16 C.F.R. Part 310,
25 in connection with a deceptive lead generation business resulting in millions of
26 unlawful telemarketing calls.

27 3. Defendants neither admit nor deny any of the allegations in the
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1 Complaint, except as specifically stated in this Order. Only for purposes of this
2 action, Defendants admit the facts necessary to establish jurisdiction.

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

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

8 II. DEFINITIONS

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

10 A. **“Covered Information”** means information from or about an
11 individual consumer, including (a) first and last name; (b) a home or other physical
12 address, including street name, name of a city or town, or zip code; (c) an email
13 address or other online contact information, such as a social media username; (d) a
14 telephone number, including mobile number; (e) gender; (f) age or date of birth;
15 (g) response to any survey or multiple-choice question about circumstances
16 specific to the consumer, such as education level, employment status, or household
17 debt; (h) biometric information; or (i) any information combined with any of (a)
18 through (h).

19 B. **“Defendants”** means the Corporate Defendant and Individual
20 Defendant, individually, collectively, or in any combination.

21 1. **“Corporate Defendant”** means Response Tree LLC and its
22 successors and assigns.

23 2. **“Individual Defendant”** means Derek Thomas Doherty.

24 C. **“Lead Generation”** means (a) using marketing techniques to identify
25 or attract prospective customers’ interest in a third party’s product or service; (b)
26 obtaining, or assisting others in obtaining, Covered Information of prospective
27 customers for a third party’s product or service; or (c) providing any such Covered
28 Information of prospective customers to a third party.

1 D. **“National Do Not Call Registry”** means the National Do Not Call
2 Registry, which is the “do-not-call” registry maintained by the Commission
3 pursuant to 16 C.F.R. § 310.4(b)(1)(iii)(B).

4 E. **“Outbound Telephone Call”** means a telephone call initiated by a
5 Telemarketer to induce the purchase of goods or services or to solicit a charitable
6 contribution.

7 F. **“Person”** or **“Persons”** includes a natural person, an organization, or
8 other legal entity, including a corporation, partnership, sole proprietorship, limited
9 liability company, association, cooperative, or any other group or combination
10 acting as an entity.

11 G. **“Telemarketer”** means any Person who, in connection with
12 Telemarketing, initiates or receives telephone calls to or from a customer or donor,
13 whether or not such Person is under the jurisdiction of the Commission.

14 H. **“Telemarketing”** means any plan, program, or campaign which is
15 conducted to induce the purchase of goods or services by use of one or more
16 telephones, and which involves a telephone call, whether or not covered by the
17 Telemarketing Sales Rule.

18 **III. BAN ON ROBOCALLS**

19 IT IS ORDERED that Defendants, whether acting directly or through an
20 intermediary, are permanently restrained and enjoined from initiating, causing
21 others to initiate, or assisting others in initiating any Outbound Telephone Call that
22 plays or delivers a prerecorded message.

23 **IV. BAN ON CALLS TO PHONE NUMBERS ON THE NATIONAL DO** 24 **NOT CALL REGISTRY**

25 IT IS ORDERED that Defendants, whether acting directly or through an
26 intermediary, are permanently restrained and enjoined from initiating, causing
27 others to initiate, or assisting others in initiating any Outbound Telephone Call to a
28 person when that person’s telephone number is on the National Do Not Call

1 Registry, maintained by the Commission, of persons who do not wish to receive
2 Outbound Telephone Calls to induce the purchase of goods or services.

3 **V. BAN ON THE COLLECTION, SALE, TRANSFER,**
4 **OR DISCLOSURE OF COVERED INFORMATION IN CONNECTION**
5 **WITH LEAD GENERATION**

6 IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents,
7 employees, and attorneys, and all other Persons in active concert or participation
8 with any of them, who receive actual notice of this Order, whether acting directly
9 or indirectly, are permanently restrained and enjoined from collecting any
10 consumer's Covered Information, or selling, transferring, or otherwise disclosing
11 any consumer's Covered Information to any Person, in connection with Lead
12 Generation.

13 **VI. MONETARY JUDGMENT FOR CIVIL PENALTY AND**
14 **SUSPENSION**

15 IT IS FURTHER ORDERED that:

16 A. Judgment in the amount of Seven Million Dollars (\$7,000,000) is
17 entered in favor of Plaintiff against Defendants, jointly and severally, as a civil
18 penalty.

19 B. Defendants are ordered to pay to Plaintiff, by making payment to the
20 Treasurer of the United States, Seven Million Dollars (\$7,000,000). This judgment
21 is suspended subject to the Subsections below.

22 C. Plaintiff's agreement to the suspension of the judgment is expressly
23 premised upon the truthfulness, accuracy, and completeness of Defendants' sworn
24 financial statements and related documents (collectively, "financial
25 representations") submitted to the Commission, namely:

- 26 1. The Financial Statement of Corporate Defendant Response Tree
27 LLC signed on July 11, 2023 by Derek Thomas Doherty;
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- 1 2. The Financial Statement of Individual Defendant Derek Thomas
- 2 Doherty signed on July 11, 2023, including attachments;
- 3 3. The monthly statements for Corporate Defendant Response Tree
- 4 LLC's bank account at J.P. Morgan Chase, N.A. for account
- 5 ending in -3237 for the period July 15, 2020 to January 30, 2023;
- 6 4. The monthly statements for Corporate Defendant Response Tree
- 7 LLC's bank account at J.P. Morgan Chase, N.A. for account
- 8 ending in -3252 for the period November 3, 2020 to March 8,
- 9 2022; and
- 10 5. The Declaration of Derek Thomas Doherty signed on August 30,
- 11 2023.

12 D. The suspension of the judgment will be lifted as to any Defendant if,

13 upon motion by Plaintiff, the Court finds that Defendant failed to disclose any

14 material asset, materially misstated the value of any asset, or made any other

15 material misstatement or omission in the financial representations identified above.

16 E. If the suspension of the judgment is lifted, the judgment becomes

17 immediately due as to that Defendant in the amount specified in Subsection A

18 above (which the parties stipulate only for purposes of this Section represents the

19 amount of the civil penalty for the violations alleged in the Complaint), plus

20 interest computed from the date of entry of this Order.

21 **VII. ADDITIONAL MONETARY PROVISIONS**

22 IT IS FURTHER ORDERED that:

23 A. Defendants relinquish dominion and all legal and equitable right, title,

24 and interest in all assets transferred pursuant to this Order and may not seek the

25 return of any assets.

26 B. The facts alleged in the Complaint will be taken as true, without

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1 further proof, in any subsequent civil litigation by or on behalf of the Commission,
2 including in a proceeding to enforce its rights to any payment or monetary
3 judgment pursuant to this Order.

4 C. Defendants agree that the judgment represents a civil penalty owed to
5 the government of the United States, is not compensation for actual pecuniary loss,
6 and, therefore, as to the Individual Defendant, it is not subject to discharge under
7 the Bankruptcy Code pursuant to 11 U.S.C. § 523(a)(7).

8 D. Defendants acknowledge that their Taxpayer Identification Numbers
9 (Social Security Numbers or Employer Identification Numbers), which Defendants
10 must submit to the Commission, may be used for collecting and reporting on any
11 delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

12 **VIII. CUSTOMER INFORMATION**

13 IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents,
14 employees, and attorneys, and all other Persons in active concert or participation
15 with any of them, who receive actual notice of this Order, are permanently
16 restrained and enjoined from directly or indirectly:

17 A. Within 30 days after the effective date of this Order, failing to destroy
18 Covered Information in all forms, including the name, address, phone number,
19 email address, gender, age, date of birth, any survey question responses, and any
20 information derived from Covered Information, including aggregate, anonymized
21 data, that are in any Defendant's possession, custody, or control and was obtained
22 prior to the date on which all Defendants have signed this Order, *provided,*
23 *however,* that a customer's information need not be deleted to the extent:

- 24 1. Requested by a government agency; or
- 25 2. Required by law, regulation, court order, contractual
26 obligations requiring Defendants to maintain records on behalf of
27 entities that buy Covered Information to document compliance with
28 federal or state laws or regulations applicable to Telemarketing or

1 email marketing, or legal process, including as required by rules
2 applicable to safeguarding of evidence in pending or anticipated
3 litigation.

4 B. For any Covered Information not deleted pursuant to Subsection A of
5 this Section, selling, transferring, or disclosing such information to any Person;

6 C. Within 60 days after the effective date of this Order, failing to:

7 1. Identify each Person who has accessed, received, or acquired a
8 consumer's Covered Information from any Defendant prior to the date
9 on which all Defendants signed this Order;

10 2. Identify what types of Covered Information were disclosed to
11 each Person identified in Subsection C(1) of this Section; or

12 3. Submit a list of the information identified in Subsections C(1)
13 and C(2) of this Section and a description of the methodologies used
14 to identify that information to Debrief@ftc.gov or sent by overnight
15 courier (not the U.S. Postal Service) to: Associate Director of
16 Enforcement, Bureau of Consumer Protection, Federal Trade
17 Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580.
18 The subject line must begin: "FTC v. Response Tree LLC, Matter No.
19 2123087";

20 D. Within 90 days after the effective date of this Order, failing to:

21 1. Provide a copy of the Complaint and Order to all Persons
22 identified under Subsection C(1) of this Section;

23 2. Notify each such Person in writing that the Federal Trade
24 Commission alleges that Defendants disclosed Covered Information
25 of consumers to them in a manner that was unfair or deceptive and in
26 violation of the FTC Act and TSR;

27 3. Instruct each such Person in writing that Covered Information
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1 accessed, received, or acquired from Defendants prior to the effective
2 date of this Order:

- 3 a. Shall not be used for Telemarketing;
4 b. To the extent such Person has not yet used the
5 Covered Information for Telemarketing, must be
6 destroyed; and
7 c. To the extent such Person has used the Covered
8 Information for Telemarketing, may be retained by
9 such Person for the sole purpose of attempting to
10 comply with state and federal recordkeeping
11 requirements applicable to Telemarketing;

12 where such instruction shall include a list of the Covered Information
13 identified in Subsection C(2) of this Section and demand written
14 confirmation that the Person has complied with the requirements of
15 Subsection D(3) of this Section;

16 4. Provide a copy of the instructions sent under Subsection D(3)
17 of this Section to Debrief@ftc.gov or sent by overnight courier (not
18 the U.S. Postal Service) to: Associate Director for Enforcement,
19 Bureau of Consumer Protection, Federal Trade Commission, 600
20 Pennsylvania Avenue NW, Washington, DC 20580. The subject line
21 must begin: "FTC v. Response Tree LLC, Matter No. 2123087"; or

22 5. Provide, within 5 days of receipt, each written confirmation
23 under Subsection D(3) of this Section to DEbrief@ftc.gov or sent by
24 overnight courier (not the U.S. Postal Service) to: Associate Director
25 for Enforcement, Bureau of Consumer Protection, Federal Trade
26 Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580.
27 The subject line must begin: "FTC v. Response Tree LLC, Matter No.
28 2123087."

1 **IX. COOPERATION**

2 IT IS FURTHER ORDERED that Defendants must fully cooperate with
3 representatives of Plaintiff and the Commission in this case and in any
4 investigation related to or associated with the transactions or the occurrences that
5 are the subject of the Complaint. Defendants must provide truthful and complete
6 information, evidence, and testimony. Individual Defendant must appear and
7 Corporate Defendant “must cause Corporate Defendant’s officers, employees,
8 representatives, or agents to appear” for interviews, discovery, hearings, trials, and
9 any other proceedings that a Plaintiff or Commission representative may
10 reasonably request upon 5 days written notice, or other reasonable notice, at such
11 places and times as a Plaintiff or Commission representative may designate,
12 without the service of a subpoena.

13 **X. ORDER ACKNOWLEDGMENTS**

14 IT IS FURTHER ORDERED that Defendants obtain acknowledgments of
15 receipt of this Order, as follows:

16 A. Each Defendant, within 7 days of entry of this Order, must submit to
17 the Commission an acknowledgment of receipt of this Order, sworn under penalty
18 of perjury.

19 B. For 20 years after entry of this Order, Individual Defendant for any
20 business that such Defendant, individually or collectively with any other
21 Defendant, is the majority owner or controls directly or indirectly, and each
22 Corporate Defendant must deliver a copy of this Order to: (1) all principals,
23 officers, directors, and LLC managers and members; (2) all employees having
24 managerial responsibilities for conduct related to the subject matter of the Order
25 and all agents and representatives who participate in conduct related to the subject
26 matter of the Order; and (3) any business entity resulting from any change in
27 structure as set forth in the Section titled Compliance Reporting. Delivery must
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1 occur within 7 days of entry of this Order for current personnel. For all others,
2 delivery must occur before they assume their responsibilities.

3 C. From each individual or entity to which a Defendant delivered a copy
4 of this Order, that Defendant must obtain, within 30 days, a signed and dated
5 acknowledgment of receipt of this Order.

6 **XI. COMPLIANCE REPORTING**

7 IT IS FURTHER ORDERED that Defendants make timely submissions to
8 the Commission:

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

11 1. Each Defendant must: (a) identify the primary physical, postal,
12 and email address and telephone number, as designated points of
13 contact, which representatives of the Commission and Plaintiff may
14 use to communicate with Defendant; (b) identify all of that
15 Defendant's businesses by all of their names, telephone numbers, and
16 physical, postal, email, and Internet addresses; (c) describe the
17 activities of each business, including the goods and services offered,
18 the means of advertising, marketing, and sales, and the involvement of
19 any other Defendant (which Individual Defendant must describe if he
20 knows or should know due to his own involvement); (d) describe in
21 detail whether and how that Defendant is in compliance with each
22 Section of this Order; and (e) provide a copy of each Order
23 Acknowledgment obtained pursuant to this Order, unless previously
24 submitted to the Commission.

25 2. Additionally, Individual Defendant must: (a) identify all
26 telephone numbers and all physical, postal, email and Internet
27 addresses, including all residences; (b) identify all business activities,
28 including any business for which such Defendant performs services

1 whether as an employee or otherwise and any entity in which such
2 Defendant has any ownership interest; and (c) describe in detail such
3 Defendant's involvement in each such business, including title, role,
4 responsibilities, participation, authority, control, and any ownership.

5 B. For 20 years after entry of this Order, each Defendant must submit a
6 compliance notice, sworn under penalty of perjury, within 14 days of any change
7 in the following:

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

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

22 C. Each Defendant must submit to the Commission notice of the filing of
23 any bankruptcy petition, insolvency proceeding, or similar proceeding by or
24 against such Defendant within 14 days of its filing.

25 D. Any submission to the Commission required by this Order to be
26 sworn under penalty of perjury must be true and accurate and comply with 28
27 U.S.C. § 1746, such as by concluding: "I declare under penalty of perjury under
28 the laws of the United States of America that the foregoing is true and correct.

1 Executed on: _____” and supplying the date, signatory’s full name, title (if
2 applicable), and signature.

3 E. Unless otherwise directed by a Commission representative in writing,
4 all submissions to the Commission pursuant to this Order must be emailed to
5 Debrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:
6 Associate Director for Enforcement, Bureau of Consumer Protection, Federal
7 Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The
8 subject line must begin: “FTC v. Response Tree LLC, Matter No. 2123087”.

9 **XII. RECORDKEEPING**

10 IT IS FURTHER ORDERED that Defendants must create certain records for
11 20 years after entry of the Order, and retain each such record for 5 years.
12 Specifically, Corporate Defendant and Individual Defendant for any business that
13 such Defendant, individually or collectively with any other Defendant, is a
14 majority owner or controls directly or indirectly, must create and retain the
15 following records:

16 A. Accounting records showing the revenues from all goods or services
17 sold;

18 B. Personnel records showing, for each person providing services,
19 whether as an employee or otherwise, that person’s: name; addresses; telephone
20 numbers; job title or position; dates of service; and (if applicable) the reason for
21 termination;

22 C. Records of all consumer complaints and refund requests, whether
23 received directly or indirectly, such as through a third party, and any response;

24 D. All written confirmations obtained under Subsection VIII(D)(3);

25 E. All records of any market, behavioral, or psychological research, or
26 user, customer, or usability testing, including any A/B or multivariate testing, copy
27 testing, surveys, focus groups, interviews, clickstream analysis, eye or mouse
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1 tracking studies, heat maps, or session replays or recordings concerning the subject
2 matter of this Order; and

3 F. All records necessary to demonstrate full compliance with each
4 provision of this Order, including all submissions to the Commission.

5 **XIII. COMPLIANCE MONITORING**

6 IT IS FURTHER ORDERED that, for the purposes of monitoring
7 Defendants' compliance with this Order:

8 A. Within 14 days of receipt of a written request from a representative of
9 the Commission or Plaintiff, each Defendant must: submit additional compliance
10 reports or other requested information, which must be sworn under penalty of
11 perjury; appear for depositions; and produce documents for inspection and
12 copying. The Commission and Plaintiff are also authorized to obtain discovery,
13 without further leave of court, using any of the procedures prescribed by Federal
14 Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36,
15 45, and 69.

16 B. For matters concerning this Order, the Commission and Plaintiff are
17 authorized to communicate directly with each Defendant. Defendant must permit
18 representatives of the Commission and Plaintiff to interview any employee or other
19 person affiliated with any Defendant who has agreed to such an interview. The
20 person interviewed may have counsel present.

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

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

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

3 **XIV. RETENTION OF JURISDICTION**

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

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7 **IT IS SO STIPULATED AND AGREED.**

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FOR PLAINTIFF:

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\s\ Rowan L. Reid

Date: 01/02/2024

1 **FEDERAL TRADE COMMISSION:**

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3 

Date: 12/22/23

4 **KARINA A. LAYUGAN**

5 **MATTHEW H. FINE**

6 **JEFFREY TANG**

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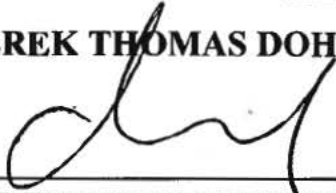
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12 *Attorneys for the Federal Trade Commission*

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1 **FOR DEFENDANTS RESPONSE TREE LLC AND**
2 **DEREK THOMAS DOHERTY**

3 

4 _____ Date: 9-22-23

5 DEREK THOMAS DOHERTY,
6 Individually and as an officer of
7 Response Tree LLC

8 _____ Date: _____
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13 *Attorney for Defendants Response Tree LLC and Derek Thomas Doherty*
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1 **FOR DEFENDANTS RESPONSE TREE LLC AND**
2 **DEREK THOMAS DOHERTY**

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_____ Date: _____
DEREK THOMAS DOHERTY,
Individually and as an officer of
Response Tree LLC

Reza Sina _____ Date: December 21, 2023
REZA SINA
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Attorney for Defendants Response Tree LLC and Derek Thomas Doherty

