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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NATIONAL HOMETEAM SOLUTIONS, LLC;

NATIONAL FINANCIAL SOLUTIONS, LLC;

Civil Action No. 4:08-cv-067

**STIPULATED PERMANENT  
INJUNCTION AND FINAL**

1 Edwin P. Taylor, Sr. have agreed to settle all matters of dispute between them without  
2 adjudication. Accordingly, it is hereby **ORDERED, ADJUDGED, AND DECREED:**

3 **FINDINGS**

4 1. This Court has jurisdiction over the subject matter of this case and personal  
5 jurisdiction over defendants.

6 2. Venue in the Eastern District of Texas is proper as to all parties.

7 3. The activities of defendants are in or affecting commerce, as defined in the FTC  
8 Act, 15 U.S.C. § 44.

9 4. The Complaint states a claim upon which relief may be granted against  
10 Defendants under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).

11 5. Defendants waive all rights to seek judicial review or otherwise challenge or  
12 contest the validity of this Final Order.

13 6. Defendants waive any claim, including any claim for attorneys' fees under the  
14 Equal Access to Justice Act, 28 U.S.C. § 2412, *amended by* Pub. L. 104-121, 110 Stat. 847, 863-  
15 64 (1996), and any claims they may have against the Commission, its employees,  
16 representatives, or agents.

17 7. Defendants enter into this Final Order freely and without coercion and  
18 acknowledge that they have read, understand, and are prepared to abide by the provisions of this  
19 Final Order.

20 8. This Final Order is in addition to, and not in lieu of, any other civil or  
21 criminal remedies that may be provided by law.

22 9. Entry of this Final Order is in the public interest.

23 **DEFINITIONS**

24 For the purpose of this Final Order, the following definitions shall apply:

25 1. "Assisting others" means knowingly providing any of the following goods or  
26 services to another business venture: (A) performing customer service functions, including, but  
27 not limited to, receiving or responding to consumer complaints; (B) formulating or providing, or  
28 arranging for the formulation or provision of, any marketing material; (C) providing names of, or

1 assisting in the generation of, potential customers; (D) hiring, recruiting, or training personnel;

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1 owner in obtaining from the beneficiary, mortgagee, trustee under a power of sale, or counsel for  
2 the beneficiary, mortgagee, or trustee, the remaining proceeds from the foreclosure sale of the  
3 owner's residence. The foregoing shall include any manner of claimed assistance, including, but  
4 not limited to, debt, budget, or financial counseling; receiving money for the purpose of  
5 distributing it to creditors; contacting creditors on behalf of the homeowner; arranging or  
6 attempting to arrange for an extension of the period within which the owner of property sold at  
7 foreclosure may cure his or her default; arranging or attempting to arrange for any delay or  
8 postponement of the time of a foreclosure sale; and giving advice of any kind with respect to  
9 filing for bankruptcy.

10 8. The term "and" also means "or," and the term "or" also means "and."

11 **ORDER**

12 **I. PROHIBITED BUSINESS ACTIVITIES**

13 **IT IS ORDERED** that defendants Nationwide Foreclosure Services, LLC, and Edwin P.  
14 Taylor, Sr., and their successors, assigns, agents, employees, officers, servants, and all other  
15 persons or entities in active concert or participation with them who receive actual notice of this  
16 Final Order by personal service, facsimile, or otherwise, whether acting directly or through any  
17 corporation, subsidiary, division or other device, are hereby permanently restrained and enjoined  
18 from:

19 A. Falsely representing, or assisting others to falsely represent, expressly  
20 or by implication, any material fact in connection with the advertising, marketing, promoting,  
21 performance, offering for sale, or sale of any mortgage foreclosure rescue service, including but  
22 not limited to misrepresenting:

- 23 (1) that home mortgage foreclosure can or will be stopped, postponed, or  
24 prevented in all or virtually all instances;
- 25 (2) the likelihood that home mortgage foreclosure can or will be stopped,  
26 postponed, or prevented;
- 27 (3) the degree of past success of any efndll.(dt10 TdddcEe sere)11oned, or  
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1 severally, as equitable monetary relief, in favor of the Commission.

2           B.       Defendants shall pay \$22,760 to the FTC in accordance with the following  
3 directions:

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1 distribution under this Section.

2 D. Defendants expressly waive their rights to litigate the issue of disgorgement.

3 E. Defendants acknowledge and agree that all money paid pursuant to this Final  
4 Order is irrevocably paid to the Commission for purposes of settlement between plaintiff and  
5 defendants.

6 F. The Commission and defendants acknowledge and agree that this judgment for  
7 equitable monetary relief is solely remedial in nature and is not a fine, penalty, punitive  
8 assessment, or forfeiture.

9 G. Defendants agree that, if they fail to timely and completely fulfill the  
10 payment and other obligations set forth in this Final Order, the facts alleged in the Complaint  
11 filed in this matter shall be taken as true in any subsequent litigation filed by the Commission to  
12 enforce its rights pursuant to this Final Order, including, but not limited to, a nondischargeability  
13 complaint in any bankruptcy case.

14 H. Defendants are hereby required, in accordance with 31 U.S.C. § 7701, to furnish  
15 to the Commission defendants' taxpayer identifying numbers (social security number or  
16 employer identification number), which shall be used for purposes of collecting and reporting on  
17 any delinquent amount arising out of defendants' relationship with the government.

18 **IV. COOPERATION WITH FTC COUNSEL**

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1 Commission, Nationwide Foreclosure Services, LLC, and Edwin P. Taylor, Sr.  
2 each shall submit additional written reports, sworn to under penalty of perjury;  
3 produce documents for inspection and copying; appear for deposition; and/or  
4 provide entry during normal business hours to any business location in such  
5 defendant's possession or direct or indirect control to inspect the business  
6 operation;

7 B. In addition, the Commission is authorized to monitor compliance with  
8 this Final Order by all other lawful means, including, but not limited to, the following:

- 9 (1) Obtaining discovery from any person, without further leave of court, using  
10 the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45;  
11 (2) Posing as consumers and suppliers to Nationwide Foreclosure Services,  
12 LLC, and Edwin P. Taylor, Sr., their employees, or any entity managed or  
13 controlled in whole or part by any defendant, without the necessity of  
14 identification or prior notice; and

15 C. Nationwide Foreclosure Services, LLC, and Edwin P. Taylor, Sr. shall permit  
16 representatives of the Commission to interview any employer, consultant, independent  
17 contractor, representative, agent, or employee who has agreed to such an interview, relating in  
18 any way to any conduct subject to this Final Order. The person interviewed may have counsel  
19 present.

20 *Provided, however,* that nothing in this Final Order shall limit the Commission's lawful  
21 use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-  
22 1, to obtain any documentary material, tangible things, testimony, or information relevant to  
23 unfair or deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C.  
24 § 45(a)(1)).

25 **VI.**  
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1 (1) Individual defendant Edwin P. Taylor, Sr. shall notify the Commission of  
2 the following:

3 (a) Any changes in his residence, mailing addresses, and telephone  
4 number, within ten (10) days of the date of such change;

5 (b) Any changes in his employment status (including self-  
6 employment), and any change in the his ownership in any business  
7 entity, within ten (10) days of the date of such change. Such  
8 notice shall include the name and address of each business that  
9 Edwin P. Taylor, Sr. is affiliated with, employed by, creates or  
10 forms, or performs services for; a statement of the nature of the  
11 business; and a statement of his duties and responsibilities in  
12 connection with the business or employment; and

13 (c) Any changes Edwin P. Taylor, Sr.'s name or use of any alias or  
14 fictitious name; and

15 (2) Defendants Nationwide Foreclosure Services, LLC, and Edwin P. Taylor,  
16 Sr. shall notify the Commission of any changes in the corporate structure  
17 of Nationwide Foreclosure Services, LLC, or any business entity that  
18 Edwin P. Taylor, Sr. directly or indirectly controls, or has an ownership  
19 interest in, that may affect compliance obligations arising under this Final  
20 Order, including, but not limited to, a dissolution, assignment, sale,  
21 merger, or other action that would result in the emergence of a successor  
22 entity; the creation or dissolution of a subsidiary, parent, or affiliate that  
23 engages in any acts or practices subject to this Final Order; the filing of a  
24 bankruptcy petition; or a change in the corporate name or address, at least  
25 thirty (30) days prior to such change, *provided* that, with respect to any  
26 proposed change in the corporation about which the defendants learn less  
27 than thirty (30) days prior to the date such action is to take place,  
28 defendants shall notify the Commission as soon as is practicable after

obtaining such knowledge.

B. One hundred eighty (180) days after the date of entry of this Final Order, Nationwide Foreclosure Services, LLC, and Edwin P. Taylor, Sr. each shall provide a written report to the Commission, sworn to under penalty of perjury, setting forth in detail the manner and form in which they have complied and are complying with this Final Order. This report shall include, but not be limited to:

(1) For individual defendant Edwin P. Taylor, Sr.:

(a) His then-current residence address, mailing address, and telephone number;

(b) His then-current employment and business addresses and telephone numbers, a description of the business activities of each such employer or business, and his title and responsibilities for each such employer or business; and

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1 Re: FTC v. National Hometeam Solutions, et al.,  
2 Civil Action No. 4:08-cv-067 (E.D. Tex.).

3 For purposes of the compliance reporting and monitoring required by this Final Order,  
4 the Commission is authorized to communicate directly with defendants Nationwide Foreclosure  
5 Services, LLC, and Edwin P. Taylor, Sr.

6 **VII. RECORD KEEPING PROVISIONS**

7 **IT IS FURTHER ORDERED** that, for a period of eight (8) years from the date of entry  
8 of this Final Order, defendants Nationwide Foreclosure Services, LLC, and Edwin P. Taylor,  
9 Sr., and those businesses where defendant Edwin P. Taylor, Sr. is the majority owner or  
10 otherwise controls the business, and their agents, directors, officers, employees, corporations,  
11 successors, and assigns, and other entities or persons directly or indirectly under their control,  
12 and all persons or entities in active concert or participation with any of them who receive actual  
13 notice of this Final Order by personal service, facsimile, or otherwise, in connection with the  
14 advertising, marketing, promoting, performance, offering for sale, or sale of mortgage  
15 foreclosure rescue services, are hereby restrained and enjoined from failing to create and retain  
16 the following records:

17 A. Accounting records that reflect the cost of goods or services sold, revenues  
18 generated, and the disbursement of such revenues;

19 B. Personnel records accurately reflecting: the name, address, and telephone number  
20 of each person employed in any capacity by such business, including as an independent  
21 contractor; that person's job title or position; the date upon which the person commenced work;  
22 and the date and reason for the person's termination, if applicable;

23 C. Customer files containing the names, addresses, phone numbers, dollar amounts  
24 paid, quantity of items or services purchased, and description of items or services purchased, to  
25 the extent such information is obtained in the ordinary course of business;

26 D. Complaints and refund requests (whether received directly, indirectly or through  
27 any third party) and any responses to those complaints or requests;

28 E. Copies of all sales scripts, training materials, advertisements, or other marketing  
materials; and

1 F. All records and documents necessary to demonstrate full compliance with each  
2 provision of this Final Order, including but not limited to, copies of acknowledgments of receipt  
3 of this Final Order, required by Section VIII.D., and all reports submitted to the FTC pursuant to  
4 Section VI.

5 **VIII. DISTRIBUTION OF ORDER BY DEFENDANTS**

6 **IT IS FURTHER ORDERED** that, for a period of five (5) years from the date of entry  
7 of this Final Order, defendants shall deliver copies of the Final Order as directed below:

8 A. Defendant Nationwide Foreclosure Services, LLC, must deliver a copy  
9 of this Final Order to all of its principals, officers, directors, and managers. Nationwide  
10 Foreclosure Services also must deliver copies of this Final Order to all of its employees, agents,  
11 independent contractors, and representatives who engage in the advertising, marketing,  
12 promoting, performance, offering for sale, or sale of mortgage foreclosure rescue services. For  
13 current personnel, delivery shall be within five (5) days of service of this Final Order upon  
14 defendants. For new personnel, delivery shall occur prior to them assuming their

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RICHARD A. SCHELL  
UNITED STATES DISTRICT JUDGE

