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6	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA								
7 8	FOR THE DISTRI	ICI OF ARIZONA							
9	Federal Trade Commission,	No. CV-16-00351-PHX-DJH							
10	Plaintiff,	STIPLUATED TEMPORARY							
11	V.								
12	Stepping Stonez Development LLC, et al.,								
13	Defendants.								
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- 2. The Court has jurisdiction over the subject matter of this case, and there is good cause to believe it will have jurisdiction over Defendants.
- 3. Venue in the District of Arizona is proper under 28 U.S.C. § 1391(b) and (c) and 15 U.S.C. § 53(b).
- 4. The FTC asserts that there is good cause to believe that Defendants Stepping Stonez Development, LLC, Intentional Growth, LLC, and Stephen J. Remley have engaged, and are likely to continue to engage, in acts or practices that violate Section 5 of the FTC Act, 15 U.S.C. § 45, and that the FTC is, therefore, likely to prevail on the merits of this action.
- 5. The FTC asserts that there is good cause to believe that immediate and irreparable harm will result from Defendants' ongoing violations of the FTC Act unless Defendants are immediately restrained by an order of this Court.
- 6. The FTC asserts that there is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief for consumers in the form of monetary restitution and disgorgement of ill-gotten gains will occur from the transfer, dissipation or concealment by Defendants of their assets or business records unless Defendants are immediately restrained and enjoined by Order of

equivalency diplomas or certificates, certifications, certificates, or any other document that confers or purports to confer a qualification, records or purports to record success in examinations or successful completion of a course of study, or evidences or purports to evidence that a consumer has completed and shown proficiency in a curriculum recognized as necessary to earn the indicated degree, diploma, certification, certificate, or other document, whether denominated as a degree, diploma, certification, certificate, or other name, whether denoted as a real or novelty item.

- 2. "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including, without limitation, chattels, goods, instruments, equipment, fixtures, general intangibles, leaseholds, mail or other deliveries, inventory, checks, notes, accounts, credits, contracts, receivables, shares of stock, and all cash, wherever located.
- 3. "Customer" means any person who has paid, or may be required to pay, for products, services, plans, or programs offered for sale or sold by any other person.
- 4. "Defendants" means the Individual Defendant and the Corporate Defendants, individually, collectively, or in any combination. "Corporate Defendants" means Stepping Stonez Development, LLC, Intentional Growth, LLC, and their successors and assigns. "Individual Defendant" means Stephen J. Remley, and any other name by which he may be known.
- 5. "Document" is equal in scope and synonymous in meaning to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and any other data compilations from which information can be obtained. A draft or non-identical copy is a separate document within the meaning of the term.
- 6. "Person" means a natural person, organization, or other legal entity, including a corporation, partnership, proprietorship, association, cooperative, or any other group or combination acting as an entity.

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I.

ORDER

PROHIBITED REPRESENTATIONS

- IT IS THEREFORE ORDERED that Defendants, their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, or sale of any academic degree or certification program are temporarily restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication:
 - A. That consumers can successfully use any academic degree or certification program as a valid high school equivalency credential when applying for jobs, seeking enrollment in higher education institutions, or for other purposes;
 - B.

B. Prevent the destruction or erasure of any Internet website used by Defendants for the advertising, marketing, promoti

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academic degree or certification program; provided, howeverthat Defendants may disclose such information to a law enforcement agency or as required by law, regulation, or court order.

ASSET FREEZE

V. IT IS FURTHER ORDERED that:

- A. Except as set forth in Sections V. B, V.C, and V.D of this Order, Defendants are hereby temporarily restrained and enjoined from directly or indirectly:
 - 1. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any funds, real or personal property, accounts, contracts, consumer lists, or any other assets, or any interest therein, wherever located, including outside the United States, that are: (1) owned or controlled, directly or indirectly, by any Defendant(s), in whole or in part, or held, in whole or in part for the benefit of any Defendant(s); (2) in the actual or constructive possession of any Defendant(s); or (3) owned, controlled by, or in the actual or constructive possession of any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by, or under common control with any Defendant(s), and any assets held by, for, or under the name of any Defendant(s) at any bank, savings and loan institution, or bank of any Defendant(s), or with any broker-dealer, escrow agent, title company, commodity trading company, precious metal dealer, or other financial institution or depository of any kind;
 - 2. Opening or causing to be opened any safe deposit boxes titled in the name of any Defendant(s), or subject to access by any Defendant(s);

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3.

- indirectly, any Defendant(s), in whole or in part, except for those identified in Section V.B, V.C, or V.D of this Order or as directed by further order of the Court;
- B. Deny the Defendants access to any safe deposit box titled in the name of any Defendant(s), individually or jointly, or subject to access by any Defendant(s), whether directly or indirectly.
- C. Provide counsel for the FTC, within three (3) business days after being served with a copy of this Order, a certified statement setting forth:
 - 1. the identification number of each such account or asset titled (1) in the name, individually or jointly, of any Defendant(s); (2) held on behalf of, or for the benefit of, any Defendant(s); (3) owned or controlled by any Defendant(s); or (4) otherwise subject to access by any Defendant(s), directly or indirectly;
 - 2. the balance of each such account, or a description of the nature and value of such asset as of the close of business on the day on which this Order is served, and, if the account or other asset has been closed or removed, the date closed or removed, the total funds removed in order to close the account, and the name of the person or entity to whom such account or other asset was remitted;
 - 3. the identification of any safe deposit box that is either titled in the name of any Defendant(s), or is otherwise subject to access by any Defendant(s); and
 - 4. if an account, safe deposit box, or other asset has been closed or removed, the date closed or removed, the balance on such date, and the manner in which such account or asset was closed or removed.
- D. Provide counsel for the FTC, within three (3) business days after being served with a request, copies of all documents pertaining to such account or asset, including but not limited to originals or copies of account applications, account statements, signature cards, checks, drafts, deposit

tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs; provided that such institution or custodian may charge a reasonable fee.

FINANCIAL REPORTS AND ACCOUNTING

- VII. IT IS FURTHER ORDERED that each Defendant, within three (3) business days of service of this Order, shall prepare and deliver to counsel for the FTC:
 - A. For the Individual Defendant, a completed financial statement accurate as of the date of service of this Order

REPATRIATION OF FOREIGN ASSETS

- **IX. IT IS FURTHER ORDERED** that, within five (5) business days following the service of this Order, each Defendant shall:
 - A. Provide counsel for the FTC with a full accounting of all assets, accounts, funds, and documents outside of the territory of the United States that are held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;
 - B. Transfer to the territory of the United States all assets, accounts, funds, and documents in foreign countries held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;
 - C. Hold and retain all repatriated assets

determination by a foreign trustee or other entity that a "duress" event has occurred under the terms of a foreign trust agreement, until such time that all assets have been fully repatriated pursuant to Section IX of this Order; and

B. Notifying any trustee, protector or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a Court Order, until such time that all assets have been fully repatriated pursuant to Section IX.

FTC ACCESS TO BUSINESS PREMISES AND RECORDS

XI. IT IS FURTHER ORDERED that:

A. The FTC and the FTC's representatives, agents, contractors, or assistants, are permitted and the Defendants shall allow immediate access to any business premises and storage facilities of Defendants. Such locations may include, but are not limited to, any location where Defendants conduct business, sales operations, fulfillment or processing, or customer service operations. Defendants shall allow the FTC into the premises and facilities described in this Section and shall allow the FTC and its representatives, agents, contractors, or assistants to inspect, i

- D. If any property, records, documents, or computer files relating to the Defendants' finances or business practices are located in the residence of any Defendant or are otherwise in the custody or control of any Defendant, then such Defendant shall produce them to counsel for the FTC within twenty-four (24) hours of service of this Order. In order to prevent the destruction of computer data, upon service of this Order upon Defendants, any such computers shall be powered down (turned off) in the normal course for the operating systems used on such computers and shall not be powered up or used again until produced for copying and inspection, along with any codes needed for access. Defendants are precluded from introducing in any proceeding in this case any document not so produced.
- E. Counsel for the FTC shall have the right to remove any documents related to Defendants' business practices from the premises in order that they may be inspected, inventoried, and copied. The materials so removed shall be returned within five (5) business days of completing said inventory and copying.
- F. In order to prevent the destruction of computer data, the FTC and the FTC's representatives, agents, contractors, or assistants, are permitted and the Defendants shall allow the FTC and the FTC's representatives, agents, contractors, or assistants to power down (turn off) any computer in the normal course for the operating system used on such computer and/or take all necessary steps to prevent remote access of any such computer. Any such computer powered down (turned off) or removed from remote access shall not be powered up (turned on) or have remote access restored except by the FTC and the FTC's representatives, agents, contractors, or assistants after they have inspected and copied the contents of such computer. The FTC shall ensure that all such computers are powered up (turned back on) and any remote access restored within three (3) business days.
- G. In the event any of Defendants' documents have been removed from Defendants' premises by, and are in the possession of another law enforcement

- or investigative agency, the FTC may have immediate access to such documents for purposes of inspection, indexing, and copying, subject to the agency consenting to access by the FTC.
- H. The FTC'S access to the Defendants' documents pursuant to this Section shall not provide grounds for any Defendant to object to any subsequent request for documents served by the FTC.
- I. The FTC is authorized to employ the assistance of law enforcement officers, including, but not limited to, the United States Postal Inspection Service, Internal Revenue Service, and Federal Bureau of Investigation, to effect service, to implement peacefully the provisions of this Order, and keep the peace.

PRESERVATION OF RECORDS

XII. IT IS FURTHER ORDERED that Defendants, their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, whether acting directly or indirectly, are hereby temporarily restrained and enjoined from taking any action, directly or indirectly, are hereby temporarily restrained and enjoined from destroying, erasing, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, any documents that relate to the business practices, or business or personal finances, of any Defendant.

LIMITED EXPEDITED DISCOVERY

- XIII. IT IS FURTHER ORDERED that the FTC is granted leave to conduct certain expedited discovery, and that, commencing with the time and date of this Order, in lieu of the time periods, notice provisions, and other requirements of Rules 26, 30, 34, and 45 of the Federal Rules of Civil Procedure, expedited discovery as to parties and non-parties shall proceed as follows:
 - A. The FTC may, upon three (3) calendar days' notice, take the deposition of any person or entity, whether or not a party, in any judicial district, for the

- purpose of discovering: (1) the assets of Defendants; (2) location of documents; and (3) compliance with this Order. Depositions may be conducted telephonically or in person. Deposition transcripts that have not been signed by the witness may be used at the preliminary injunction hearing in this matter. Provided that not with standing Federal Rule of Civil Procedure 30(a)(2), this Section shall not preclude any future depositions by the FTC. Provided further that any deposition taken pursuant to this Section shall be in addition to, and not subject to, the presumptive limits on depositions set forth in Federal Rule of Civil Procedure 30(a)(2)(A).
- B. The FTC may serve interrogatories for the purpose of discovering: (1) the assets of Defendants; (2) location of documents; and (3) compliance with this Order. Defendants shall respond within five (5) calendar days after the FTC serves such interrogatories. Provided that not with standing Federal Rule of Civil Procedure 33(a)(1), this Subsection shall not preclude any future interrogatories by the FTC.
- C. The FTC may, upon five (5) calendar days' notice, including through the use of a Rule 45 Subpoena, demand the production of documents from any person or entity, whether or not a Defendant, relating to: (1) the assets of Defendants; (2) the location of documents; and (3) compliance with this Order. Provided thatwo (2) calendar days' notice shall be deemed sufficient for the production of any such documents that are maintained or stored only as electronic data.
- D. The FTC is granted leave to subpoena documents immediately from any financial institution, account custodian, or other entity or person that holds, controls, or maintains custody of any account or asset of any Defendant(s), or has held, controlled or maintained custody of any account or asset of any Defendant(s) concerning the nature, location, status, and extent of Defendants' assets, and compliance with this Order, and such financial

ORDER TO SHOW CAUSE AND PRELIMINARY INJUNCTION HEARING

XVII. IT IS FURTHER ORDERED, pursuant to Federal Rule of Civil Procedure 65(b), that Defendants shall appear on February 26, 2016 at 9:00 a.m. in Courtroom 605, 401 West Washington Street, Phoenix, AZ 85003, to show cause, if any there be, why this Court should not enter a preliminary injunction, pending final ruling on the complaint, against Defendants, enjoining them from further violations of the FTC Act, and imposing such additional relief as may be appropriate.

SERVICE OF PLEADINGS, EVIDENCE, WITNESS LISTS XVIII. IT IS FURTHER ORDERED that:

- A. Defendants shall file any answering affidavits, pleadings, or legal memoranda with the Court and serve the same on counsel for the FTC no later than five (5) business days prior to the preliminary injunction hearing in this matter. The FTC may file responsive or supplemental pleadings, materials, affidavits, or memoranda with the Court and serve the same on counsel for Defendants no later than one (1) business day prior to the preliminary injunction hearing in this matter. Provided that ervice shall be performed by personal or overnight delivery, facsimile, or email, and documents shall be delivered so that they shall be received by the other parties no later than 4 p.m. (MST) on the appropriate dates listed in this Subsection;
- B. The question of whether this Court should enter a preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining the Defendants during the pendency of this action shall be resolved on the pleadings, declarations, exhibits, and memoranda filed by, and oral argument of, the parties. Live testimony shall be heard only on further order of this Court on motion filed with the Court and served on counsel for the other parties at least five (5) business days prior to the preliminary injunction hearing in this matter. Such motion shall set forth the name,

address, and telephone number of each proposed witness, a detailed summary or affidavit disclosing the substance of each proposed witness' expected testimony, and an explanation of why the taking of live testimony would be helpful to this Court. Any papers opposing a timely motion to present live testimony or to present live testimony in response to live testimony to be presented by another party shall be filed with this Court and served on the other parties at least three (3) business days prior to the preliminary injunction hearing in this matter. Provided thatervice shall be performed by personal or overnight delivery or by facsimile or email, and documents shall be delivered so that they shall be received by the other parties no later than 4 p.m. (MST) on the appropriate dates listed in this Sub-section.

DURATION OF ORDER

XIX. IT IS FURTHER ORDERED that that the Temporary Restraining Order granted herein shall expire shall expire fourteen (14) days from the date of entry noted below, unless within such time, the Order is extended for an additional period pursuant to Federal Rule of Civil Procedure 65(b)(2).

JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

Dated this 12th day of February, 2016.

Honorable Diane J. Humetewa United States District Judge

SCHEDULE A TO TEMPORARY RESTRAINING ORDER LIST OF DOMAIN NAMES

GEDONLINEDIPLOMA.COM GEDONLINEDIPLOMA.NET

GED-ONLINE.ORG GEDDIPLOMA.NET GEDDIPLOMA.ORG GED-TEST.ORG

GETHIGHSCHOOLDIPLOMA.NET

GEDCLASS.ORG

GETHIGHSCHOOLDIPLOMA.ORG

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GETAGED.ORG

HIGHSCHOOLDIPLOMAONLINE.NET

GEDONLINE.US
GETAGEDONLINE.ORG
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ATTACHMENT A

BACKGROUND INFORMATION							
Item 1. Information About You							
Full Name	Social Security No.						
Current Address of Primary Residence	Driver's License No.	State Issued					
	Phone Numbers Home:	I					

Item 5. Information About Dependents (whether or not they reside with you)						
Name and Address	Social Security No.	Date of Birth				
		/ / (mm/dd/yyyy)				
	Relationship					
Name and Address	Social Security No.	Date of Birth				
		/ / (mm/dd/yyyy)				
	Relationship	1 \ 7777				
Name and Address	Social Security No.	Date of Birth / / (mm/dd/yyyy)				
	Relationship	Пінистру				
Name and Address	Social Security No.	Date of Birth / / (mm/dd/yyyy)				
	Relationship	Пінистру				
Item 6. Employment Info rmation/Employment Income Provide the following information for this year-to-date and for each of the previous five full years, for each business entity of which you were a director, officer, member, partner, employee (including self-employment), agent, owner, shareholder, contractor, participant or consultant at any time during that period. "Income" includes, but is not limited to, any salary, commissions, distributions, draws, consulting fees, loans, loan payments, dividends, royalties, and benefits for which you did not pay (e.g., health insurance premiums, automobile lease or loan payments) received by you or anyone else on your behalf.						

Item 7. Pending Lawsuits File List all pending lawsuits that have been any foreign country or territory. Note: resulted in final judgments or settlements.	en filed by or against you or your spor At Item 12, list lawsuits that resulter	use in anv court	or beforents or se	e an adminis ettlements in	trative ag	gency in the United or. At Item 21, list l	States or in awsuits that
Caption of Proceeding	Court or Agency and Location	Case No.	Nature of Proceeding		Re	Status or Disposition	
			FIC	ceeding		-	Disposition
Itana O. Cafa Danasit Danas					-		<u> </u>
Item 8. Safe Deposit Boxes List all safe deposit boxes, located wi you, your spouse, or any of your depo	thin the United States or in any foreig endents, or held by others for the ben	n country or ter efit of you, your	ritory, wh	nether held in or any of you	dividually ur depend	or jointly and whe	ther held by
Name of Owner(s)	Name & Address of Depos	sitory Institution		Box No.		Contents	
						Init	tials:

FINANCIAL INFORMATION

REMINDER: When an item asks for information regarding your "assets" and "liabilities" include <u>ALL</u> assets and liabilities, located within the United States or in any foreign country or territory, or institution, whether held individually or jointly, and whether held by you, your spouse, or any of your dependents, or held by others for the benefit of you, your spouse, or any of your dependents. In addition, provide all documents requested in Item 24 with your completed Financial Statement.

ASSETS

Item 9. Cash, Bank, and Money Market Accounts

List cash on hand (as opposed to cash in bank accounts or other financial accounts) and all bank accounts, money market accounts, or other financial accounts, including but not limited to checking accounts, savings accounts, and certificates of deposit. The term "cash on hand" includes but is not limited to cash in the form of currency, uncashed checks, and money orders.

a. Amount of Cash on Hand \$		Form of Cash on Hand			
b. Name on Account	Name & Address of Finan	cial Institution	Account No.	Current Balance	
				\$	
				\$	
				\$	
				\$	

Itam 11	Non-Public Business	and Financial	Interacte
пеш п.	MOH-Public Dusiness	and Financial	IIIIeresis

List all non-public business and financial interests, including but not limited to any interest in a non-public corporation, subchapter-S corporation, limited liability corporation ("LLC"), general or limited partnership, joint venture, sole proprietorship, international business corporation or personal investment corporation, and oil or mineral lease.

Entity's Name & Address	Type of Business or Financial Interest (e.g., LLC, partnership)	Owner (e.g., self, spouse)	Ownership %	If Officer, Director, Member or Partner, Exact Title
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Item 15. Pending Insurance Payments or Inheritances List any pending insurance payments or inheritances owed to you.		
Туре	Amount Expected	Date Expected (mm/dd/yyyy)
	\$	/ /
	\$	/ /
	\$	/ /
Item 16. Vehicles List all cars, trucks, motorcycles, boats, airplanes, and other vehicles.		

Vehicle TypeYearRegistered Owner's NamePurchase PriceOriginal Loan AmountCurrent Balance\$\$\$

Item 18. Real Property List all real property interests (including any land contract)								
, , , , , , , , , , , , , , , , , , , ,						Name(s) on Title or Contract and Ownership Percentages		
Property's Location		Type of Floperty				Name(s) on the or contract	and Ownership Fercentages	
Acquisition Date (mm/dd/yyyy)	Puro \$	chase Price			Cur \$	rrent Value	Basis of Valuation	
Lender's Name and Address	<u> </u>		Loa	n or Acc	ount	No.	Current Balance On First Mortgage or	
							Contract	
							\$	
						Monthly Payment		
							\$	
Other Mortgage Loan(s) (describe)			Monthly Payment		yment	☐ Rental Unit		
			\$					
			Current Balance		lance	Monthly Rent Received		
				\$			\$	
Property's Location		Type of Property				Name(s) on Title or Contract	t and Ownership Percentages	
Acquisition Date (mm/dd/yyyy)	Purc	hase Price			Cur	rrent Value	Basis of Valuation	
/ /	\$				\$			
Lender's Name and Address		Loa	n or Acc	ount	No.	Current Balance On First Mortgage or		
							Contract	
							\$	
							Monthly Payment	
							\$	

Item 24.	Document Requests		
		9 of 10	Federal Trade Commission Financial Statement of Individual Defendant

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ATTACHMENT B



ATTACHMENT C

CONSENT TO RELEASE FINANCIAL RECORDS

I,, of
(City, State), do hereby direct any bank,
saving and loan association, credit union, depository institution, finance company, commercial
lending company, credit card processor, credit card processing entity, automated clearing house
network transaction processor, bank debit processing entity, brokerage house, escrow agent,
money market or mutual fund, title company, commodity trading company, trustee, or person
that holds, controls, or maintains custody of assets, wherever located, that are owned or
controlled by me or at which there is an account of any kind upon which I am authorized to
draw, and its officers, employees, and agents, to disclose all information and deliver copies of all
documents of very nature in its possession or control which relate to the said accounts to any
attorney of the Federal Trade Commission, and to give evidence relevant thereto, in the matter of
the Federal Trade Commission v. Stepping Stonez Developht@t et al, now pending in the
United States District Court for the District of Arizona, and this shall be irrevocable authority for
so doing.
This direction is intended to apply to the laws of countries other than the Unites States of
America which restrict or prohibit disclosure of bank or other financial information without the
consent of the holder of the account, and shall be construed as consent with respect hereto, and
the same shall apply to any of the accounts for which I may be a relevant principal.
Dated: Signature:
Printed Name: