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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Federal Trade Commission,
Plaintiff,
v.
Stepping Stonez Development LLC, et al.,
Defendants.

No. CV-16-00351-PHX-DJH

**STIPULATED PRELIMINARY
INJUNCTION**

On February 8, 2016, Plaintiff, Federal Trade Commission (“FTC”), filed a complaint seeking a permanent injunction and other equitable relief, pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). On February 12, 2016, the Court entered a stipulated Temporary Restraining Order (“TRO”). Now, the FTC and Defendants, by and through their undersigned counsel, have stipulated and agreed to the entry of a preliminary injunction (“Order”). (Doc. 20).

Based on the parties' Stipulation (Doc. 20), and as fully set forth herein,

IT IS HEREBY ORDERED vacating the Preliminary Injunction Hearing set for February 26, 2016.

IT IS FURTHER ORDERED as follows:

FINDINGS

By stipulation of the parties, the Court finds as follows:

1. The FTC and Defendants have stipulated and agreed to the entry of this preliminary injunction order without any admission of wrongdoing or violation of law, and without a finding by the Court of law or fact other than stated below.

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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 comb

- 1 B. That any high school, college, university, training program, or other educational
- 2 institution issuing any academic degree or certification program has been accredited
- 3 by an independent, third-party accrediting body;
- 4 C. The nature or scope of the accreditation status of any academic degree or certification
- 5 program;
- 6 D. Any other fact material to a consumer's decision whether to purchase any academic
- 7 degree or certification program.

8 **DISABLEMENT OF WEB SITES**

9 **II. IT IS FURTHER ORDERED** that, immediately upon service of the Order upon them,

- 10 (1) any person hosting any Internet website for, or on behalf of, any Defendant, and
- 11 (2) Defendants, their officers, agents, employees, and attorneys, and all other persons in
- 12 active concert or participation with any of them who receive actual notice of this Order
- 13 by personal service or otherwise, whether acting directly or indirectly, shall:

- 14 A. Immediately do whatever is necessary to ensure that any Internet website used by
- 15 Defendants for the advertising, marketing, promotion, offering for sale, sale, or
- 16 provision of any academic degree or certification program, and containing statements
- 17 or representations prohibited by Section I of this Order, including, but not limited to
- 18 the Internet websites listed on **Schedule A** of this Order, cannot be accessed by the
- 19 public;
- 20 B. Prevent the destruction or erasure of any Internet website used by Defendants for the
- 21 advertising, marketing, promotion, offering for sale, sale, or provision of any
- 22 academic degree or certification program, including, but not limited to the Internet
- 23 websites listed on **Schedule A** of this Order, by preserving such website in the format
- 24 in which they are maintained currently; and
- 25 C. Immediately notify in writing counsel for the FTC of any other Internet website
- 26 operated or controlled by any Defendant and used by Defendants for the advertising,
- 27 marketing, promotion, offering for sale, sale, or provision of any academic degree or
- 28 certification program that is not listed in Section II.A or B above.

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1. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigni

1 matter of the Complaint, provided, however, that he shall first deposit such income into
2 the account identified in Section V.B above.

3 D. Individual Defendant may retain and spend assets acquired by loan or gift after the date
4 of entry of this Order only after identifying such assets to FTC counsel. This notice
5 provision does not apply to loans or gifts valued at less than \$500

6 **RETENTION OF ASSETS AND RECORDS BY FINANCIAL INSTITUTIONS AND**
7 **OTHER THIRD PARTIES**

8 **VI. IT IS FURTHER ORDERED** that any financial or brokerage institution or depository,
9 escrow agent, title company, commodity trading company, trust, entity, or person that
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- 1 directly or indirectly;
- 2 2. the balance of each such account, or a description of the nature and value of
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1 with FTC counsel) on the form of **Attachment A** to this Order captioned, "Form
2 Re: Financial Statement for Individual Defendant."

3 B. For the Corporate Defendants, a completed financial statement accurate as of the
4 date of service of this Order upon such Defendant (unless otherwise agreed upon
5 with FTC counsel) in the form of **Attachment B** to this Order captioned, "Form
6 Re: Financial Statement for Business Entity Defendant."

7 C. For each Defendant, a completed statement, verified under oath, of all payments,
8 transfers or assignments of funds, assets, or property worth \$1,000 or more since
9 January 1, 2004. Such statement shall include: (a) the amount transferred or
10 assigned; (b) the name of each transferee or assignee; (c) the date of the transfer or
11 assignment; and (d) the type and amount of consideration paid the Defendant.
12 Each statement shall specify

1 correspondence and service of pleadings on the FTC shall be sent either via electronic
2 transmission or via Federal Express to: Gregory A. Ashe, Federal Trade Commission,
3 600 Pennsylvania Avenue, NW, Room CC-10232, Washington, DC 20580. Email:
4 gashe@ftc.gov; Telephone: (202) 326-3719; Facsimile: (202) 326-3768.

5 **JURISDICTION**

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

8 **Dated** this 24th day of February, 2016.
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SCHEDULE A TO PRELIMINARY INJUNCTION
LIST OF DOMAIN NAMES

GEDONLINEDIPLOMA.COM
GEDONLINEDIPLOMA.NET
GED-ONLINE.ORG
GEDDIPLOMA.NET
GEDDIPLOMA.ORG
GED-TEST.ORG
GETHIGHSCHOOLDIPLOMA.NET
GEDCLASS.ORG
GETHIGHSCHOOLDIPLOMA.ORG
GETGED.ORG
HIGHSCHOOLDIPLOMAONLINE.NET
GETAGED.ORG
GEDONLINE.US
GETAGEDONLINE.ORG
EARNAGED.COM
EARNAGED.ORG
EARNGED.ORG
EARNAGEDONLINE.COM
GEDONLINEDIPLOMA.ORG
GEDONLINE.CO.UK
HIGHSCHOOLDIPLOMA.CO.UK
GEDONLINE.COM
ONLINEHIGHSCHOOLDIPLOMA.CO.UK
GEDTEST.CO.UK
GEDONLINE.NET
HIGHSCHOOLDIPLOMATHOME.COM
GEDONLINEPROGRAM.ORG
FREEHIGHSCHOOLDIPLOMAONLINE.ORG
HIGHSCHOOLDIPLOMAJOBS.ORG
GETGEDONLINE.ORG
GEDONLINETEST.ORG
ONLINEHIGHSCHOOLDIPLOMAS.ORG
EARNHIGHSCHOOLDIPLOMA.ORG
HIGHSCHOOLCOURSES.ORG
HIGHSCHOOLDIPLOMATEST.ORG
ACCREDITEDHIGHSCHOOLDIPLOMA.ORG
HIGHSCHOOLONLINECOURSES.ORG
GEDONLINECLASS.ORG
HIGHSCHOOLDIPLOMAPROGRAM.ORG
FREEHIGHSCHOOLDIPLOMA.ORG
GEDPREPARATION.NET
GEDCOURSE.ORG
FREEONLINEGED.NET
GEDSTUDY.NET
TAKEGED.COM
GEDONLINEHIGHSCHOOLDIPLOMA.COM
ONLINEGEDTEST.ORG
FREEGEDTEST.ORG
FREEONLINEGED.ORG
GEDONLINETEST.NET
GEDPREP.ORG
FREEGEDPRACTICETEST.ORG
HIGHSCHOOLDIPLOMAONLINE.ORG
AEDDEFIBRILLATION.COM
AEDDEFIBRILLATORS.NET
ONLINEGEDPRACTICETEST.COM
GEDPRACTICETESTFREE.COM
GEDTESTINGONLINE.ORG
GEDSTUDYGUIDE.NET
FREEONLINEGEDTEST.ORG
GEDBOOKS.ORG
FREEGEDPRACTICETEST.COM
FREEGED.US
GEDPRACTICETEST.US
PALSRECERTIFICATION.US
PALS-ONLINE.COM
ONLINEPALS.ORG
PALSONLINETRAINING.COM
PALSCERTIFICATE.COM
PALSONLINECERTIFICATE.COM
PALSONLINECLASSES.COM
PALSCOURSESONLINE.COM
PALSCOURSES.ORG
PALSONLINERENEWAL.COM
PALSRENEWAL.ORG
PALSONLINECOURSES.ORG
PALSCCLASS.ORG
PALSCOURSEONLINE.ORG
PALSCCLASSES.ORG
PALSONLINERECERTIFICATION.ORG
PALSCERTIFICATIONONLINE.ORG
PALSONLINECLASS.ORG
PALSONLINECERTIFICATION.ORG
PALSRECERTIFICATIONONLINE.ORG
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PALSONLINECOURSE.NET
PALSCOURSE.COM
PALSCERTIFICATION.ORG
PALSCOURSE.ORG
PALSRECERTIFICATION.ORG
PALSRECERTIFICATION.NET
PALSRECERT.COM
PALSRECERTIFICATIONCOURSE.COM
PALSTEST.COM
PALSCERTIFICATIONCOURSE.COM

PALSPRETEST.COM
NAMCCA.ORG
NAMCCA.COM
STUDENTSERVICEADVISORS.COM
BLSCOURSE.NET
BLSTRAINING.NET
BLSONLINE.ORG
BLSRECERTIFICATION.ORG
CPRBLS.NET
BLSCOURSE.ORG
BLSRECERTIFICATION.NET
BLSCERTIFICATION.ORG
PALSPROVIDER.COM
PALSONLINEPROVIDER.COM
ACLSONLINETODAY.COM
LASTMINUTEACLS.COM
ACLSCERTIFICATIONCOURSE.COM
ACLSONLINERENEWAL.COM
ACLRECERTIFICATIONCOURSE.COM
BLSONLINERECERTIFICATION.COM
BLSRENEWALCOURSE.COM
BLSONLINECOURSE.COM
BLSONLINECLASS.COM
BLSTEST.COM
BLSRECERTIFICATIONONLINE.COM
BLSCERTIFICATIONONLINE.COM
BLSCERTIFICATIONCOURSE.COM
BLSONLINECERTIFICATION.COM
CPRONLINECERTIFICATION.COM
NRPCOURSES.COM
NRPRECERTIFICATION.COM
CPRONLINERECERTIFICATION.COM

ONLINEPALSCERTIFICATION.NET
PEDIATRICADVANCEDLIFESUPPORTONLINE.NET
AHAPALSONLINE.NET
ONLINEPALSRECERTIFICATION.ORG
PEDIATRICADVANCEDLIFESUPPORTONLINE.COM
AHAPALSONLINE.COM
ACLSPALSCERTIFICATION.COM
AHAPALSONLINE.ORG
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ONLINEPALSCERTIFICATION.ORG
PEDIATRICADVANCEDLIFESUPPORTONLINE.ORG
AHAPALS.COM
PALSCOURSESONLINE.NET
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ONLINEPALSCOURSES.COM
PALSPROVIDER.ORG
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PEDIATRICADVANCEDLIFESUPPORTCOURSE.COM
PALS-ONLINE.ORG
PALS-ONLINE.NET

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PALSONLINEPROGRAM.ORG
PALSPROVIDERCOURSE.NET
PALSONLINEPROGRAM.NET
PALSRENEWAL.NET
PALSPROVIDERCOURSE.ORG
PALSONLINEPROGRAM.COM
PALSPROVIDERCOURSE.COM
PIPERHEALTH.NET
PIPERHEALTH.COM
PIPERHEALTH.ORG
STABLECOURSE.COM

STABLECERTIFICATION.COM
CHRISTIANHIGHSCHOOL.NET
HIGHSCHOOLONLINEDEGREE.COM
HIGHSCHOOLONLINEDEGREE.ORG
HIGHSCHOOLONLINEDEGREE.NET
AMERICANHEALTHACADEMY.NET
AMERICANHEALTHACADEMY.ORG
MY-GED.COM
FASTHIGHSCHOOLDIPLOMAONLINE.COM
ONLINEHIGHSCHOOLDIPLOMAPROGRAM.COM
FREEHIGHSCHOOLDIPLOMAONLINE.COM
GEDONLINEPROGRAMS.COM
DALLOWAY-SCHOOL.COM
ONLINEACLSCOURSE.NET
ONLINEACLSCOURSE.ORG
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ACLSCOURSEONLINE.NET
ACLSONLINECLASS.NET
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PALSCERTIFICATIONCOURSES.ORG

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FORKLIFTRENEWAL.ORG
FORKLIFTRECERTIFICATIONONLINE.ORG
FORKLIFTRENEWAL.NET
FORKLIFTRECERTIFICATIONONLINE.NET

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:

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	
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	

Item 6. Employment Information/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.

Company Name and Address	Dates Employed	Income Received: Y-T-D & 5 Prior Yrs.
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Item 7. Pending Lawsuits Filed By or Against You or Your Spouse

List all pending lawsuits that have been filed by or against you or your spouse in any court or before an administrative agency in the United States or in any foreign country or territory. Note: At Item 12, list lawsuits that resulted in final judgments or settlements in your favor. At Item 21, list lawsuits that resulted in final judgments or settlements against you.

Caption of Proceeding	Court or Agency and Location	Case No.	Nature of Proceeding	Relief Requested	Status or Disposition

Item 8. Safe Deposit Boxes

List all safe deposit boxes, located within the United States or in any foreign country or territory, 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.

Name of Owner(s)	Name & Address of Depository Institution	Box No.	Contents

Initials: _____

FINANCIAL INFORMATION

REMINDER: When an item asks for information regarding your "assets" and "liabilities" include ALL 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 Financial Institution	Account No.	Current Balance
			\$
			\$
			\$

Item 11. Non-Public Business and Financial Interests

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.

Type	Amount Expected	Date Expected (mm/dd/yyyy)
	\$	/ /
	\$	/ /
	\$	/ /

Item 16. Vehicles

List all cars, trucks, motorcycles, boats, airplanes, and other vehicles.

Vehicle Type	Year	Registered Owner's Name	Purchase Price \$	Original Loan Amount \$	Current Balance \$
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Item 18. Real Property

List all real property interests (including any land contract)

Property's Location		Type of Property	Name(s) on Title or Contract and Ownership Percentages	
Acquisition Date (mm/dd/yyyy) / /	Purchase Price \$	Current Value \$	Basis of Valuation	
Lender's Name and Address		Loan or Account No.	Current Balance On First Mortgage or Contract \$	
			Monthly Payment \$	
Other Mortgage Loan(s) (describe)		Monthly Payment \$	<input type="checkbox"/> Rental Unit	
		Current Balance \$	Monthly Rent Received \$	
Property's Location		Type of Property	Name(s) on Title or Contract and Ownership Percentages	
Acquisition Date (mm/dd/yyyy) / /	Purchase Price \$	Current Value \$	Basis of Valuation	
Lender's Name and Address		Loan or Account No.	Current Balance On First Mortgage or Contract \$	
			Monthly Payment \$	

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 every 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 Development, LLC 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 United 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: _____