

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

CSGOLOTTO, INC.,
a corporation,

TREVOR MARTIN, a/k/a TmarTn,
individually and as an
officer of CSGOLOTTO, INC., and

THOMAS CASSELL, a/k/a
TheSyndicateProject, Tom Syndicate, and
Syndicate, individually and as an officer of
CSGOLOTTO, INC.

FILE NO. 162-3184

AGREEMENT CONTAINING
CONSENT ORDER

The Federal Trade Commission ("Commission") has conducted an investigation of certain acts and practices of CSGOLOTTO, INC., a corporation, and Trevor Martin and Thomas Cassell, individually and as officers of CSGOLOTTO, INC. ("Proposed Respondents"). The Commission's Bureau of Consumer Protection ("BCP") has prepared a draft of an administrative complaint ("draft Complaint"). BCP and Proposed Respondents vvv

2. Proposed Respondents neither admit nor deny of the allegations in the Complaint, except as specifically stated in the Decision and Order. Only for purposes of this action, Proposed Respondents admit the facts necessary to establish jurisdiction

3. Proposed Respondent waives:

- a. Any further procedural steps;
- b. The requirement that the Commission's

3. An audible disclosure

II. Required Disclosure of Material Connections

IT IS FURTHER ORDERED that Respondent and Respondent's officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of

Respondent, any other individual or entity affiliated with the product or service or the product or service.

Provided, however, that Respondent may provide an endorser with notice of failure to adequately disclose and an opportunity to cure the disclosure prior to terminating the endorsement if Respondent reasonably conclude that the failure to adequately disclose was inadvertent. Respondent shall inform any endorser to whom they have provided a notice of a failure to adequately disclose an unexpected material connection that any subsequent failure to adequately disclose will result in immediate termination (m)-c(e)62ion (m).

- 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, 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 with: CSG Otto, Inc.

VI. Recordkeeping

IT IS FURTHER ORDERED that Respondents must create certain records for 5 years after the issuance date of the Order and retain each such record for 5 years, unless otherwise specified below. Specifically, Corporate Respondent and each Individual Respondent for any business that such Respondent, individually or collectively with any other Respondents, 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, the costs incurred in generating those revenues, and resulting net profits.

VII. Compliance Monitoring

IT IS FURTHER ORDERED that, for the purpose of monitoring Respondents compliance with this Order:

- A. Within 10 days of receipt of a written request from a representative of the Commission, each Respondent must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury, and produce records for inspection and copying
- B. For matters concerning this Order, representatives of the Commission are authorized to communicate directly with each Respondent. Respondents permit representatives of the Commission to interview anyone affiliated with any Respondent who has agreed to such an interview. The interviewee may have counsel present.
- C. The Commission may use all other lawful means, including posing through its representatives as consumers, suppliers, or other individuals or entities, to Respondents or any individual or entity affiliated with Respondents, 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.
- D. Upon written request from a representative of the Commission, any consumer reporting agency must furnish consumer reports concerning Individual Respondents, pursuant to Section 604(a) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)

VIII . Order Effective Dates

Provided, further, that if such complaint is dismissed or a federal court rules that the Respondent did not violate any provision of the Order, and the dismissal or ruling is either not appealed or upheld on appeal, then the Order will terminate according to this Provision as though the complaint had never been filed, except that the Order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

Donald S. Clark
Secretary

SEAL:
ISSUED: