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with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with promoting or offering for sale any good or service are permanently restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication:

- A. The total costs to purchase, receive, or use, and the quantity of, any good or service;
- B. Any material restriction, limitation, or condition to purchase, receive, or use any good or service;
- C. Any material aspect of the performance, efficacy, nature, or central characteristics of any good or service;
- D. The nature, expertise, position, or job title of any person who provides any good or service;
- E. The person who will provide any good or service;
- F. Any material aspect of the nature or terms of any refund, cancellation, exchange, or repurchase policy, including, but not limited to, the likelihood of a consumer obtaining a full or partial refund, or the circumstances in which the full or partial refund will be granted to the consumer;
- G. That any person providing a testimonial has purchased, received, or used the good or service;
- H. That the experience represented in a testimonial of a good or service represents the person's actual experience resulting from the use of the good or service under the circumstances depicted in the advertisement;
- I. That the experience represented in a testimonial of a good or service is representative of what consumers will generally achieve with the good or service;
- J. That any person is affiliated with the advertiser.

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xxxx6882 in the name of Stepping Stonez Development, LLC d/b/a Response Services, xxxx0881 in the name of Stepping Stonez Development, LLC d/b/a National Online Health, xxxx6885 in the name of Stepping Stonez Development, LLC, xxxx3885 in the name of Stepping Stonez Development, LLC, xxxx4882 in the name of Stepping Stonez Development, LLC, xxxx8881 in the name of Stepping Stonez Development, LLC, xxxx2885 in the name of Stepping Stonez Development, LLC, xxxx7886 in the name of Stepping Stonez Development, LLC, and xxxx7889 in the name of Stepping Stonez Development, LLC;

4. PayPal, Inc. shall, within ten (10-ac. sha04 -fi(621 Tw785.143 0(ess days1.5(receipt1.5(a cop

karat gold pin identified on his financial statement, (xii) the 10 karat gold pin
identified on his financial statement, (xiii) the Rolex gold-plated pen identified
on his financial statement, (xiv) the

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1 FTC may apply any remaining money for such other equitable relief (including
2 consumer information remedies) as it determines to be reasonably related to
3 Defendants' practices alleged in the Complaint. Any money not used for such
4 equitable relief is to be deposited to the U.S. Treasury as disgorgement.

5 Defendants have no right to challenge any actions the FTC or its representatives
6 may take pursuant to this Subsection.

7 **CUSTOMER INFORMATION**

8 **IV. IT IS FURTHER ORDERED** that Defendants, Defendants' officers, agents,
9 employees, and attorneys, and all other persons in active concert or participation
10 with any of them, who receive actual notice of this Order, whether acting directly or
11 indirectly, are permanently restrained and enjoined from directly or indirectly:

- 12 A. Failing to provide sufficient customer information to enable the FTC to efficiently
13 administer consumer redress. If a representative of the FTC requests in writing any
14 information related to redress, Defendants must provide it, in the form prescribed by
15 the FTC, within 14 days.
- 16 B. Disclosing, using, or benefitting from customer information, including the name,
17 address, telephone number, email address, social security number, other identifying
18 information, or any data that enables access to a customer's account (including a
19 credit card, bank account, or other financial account), that any Defendant obtained
20 prior to entry of this Order in connection with the marketing and sale of any
21 academic degree or certification program; and
- 22 C. Failing to destroy such customer information in all forms in their possession,
23 custody, or control within 30 days after receipt of written direction to do so from a
24 representative of the FTC.

25 Provided, however, that customer information need not be disposed of, and may be
26 disclosed, to the extent requested by a government agency or required by law,
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regulation, or court order.

COOPERATION

V. **IT IS FURTHER ORDERED** that Defendants must fully cooperate with representatives of the FTC in this case and in any investigation related to or associated with the transactions or the occurrences that are the subject of the Complaint. Defendants must provide truthful and complete information, evidence, and testimony. Individual Defendant must appear and Corporate Defendants must cause Defendants' officers, employees, representatives, or agents to appear for interviews, discovery, hearings, trials, and any other proceedings that an FTC representative may reasonably request upon 5 days written notice, or other reasonable notice, at such places and times as an FTC representative may designate, without the service of a subpoena.

ORDER ACKNOWLEDGMENTS

VI. **IT IS FURTHER ORDERED** that Defendants obtain acknowledgments of receipt of this Order:

- A. Each Defendant, within 7 days of entry of this Order, must submit to the FTC an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. For 5 years after entry of this Order, Individual Defendant for any business that such Defendant, individually or collectively with any other Defendants, is the majority owner or controls directly or indirectly, and each Corporate Defendant, must deliver a copy of this Order to: (1) all principals, officers,

ownership or control, Individual Defendant must deliver a copy of this Order to all principals and managers of the business before participating in conduct related to the subject matter of this Order. Delivery must occur within 7 days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

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

COMPLIANCE REPORTING

VII. IT IS FURTHER ORDERED that Defendants make timely submissions to the FTC:

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

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

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1 numbers; job title or position; dates of service; and (if applicable) the reason
2 for termination;

- 3 C. Records of all consumer complaints and refund requests, whether received
4 directly or indirectly, such as through a third party, and any response;
- 5 D. All records necessary to demonstrate full compliance with each provision of
6 this Order, including all submissions to the FTC; and
- 7 E. A copy of each unique advertisement or other marketing material.

8 **COMPLIANCE MONITORING**

9 **IX. IT IS FURTHER ORDERED** that, for the purpose of monitoring Defendants'
10 compliance with this Order, including the financial representations upon which part
11 of the judgment was suspended and any failure to transfer any assets as required by
12 this Order:

- 13 A. Within 14 days of receipt of a written request from a representative of the
14 FTC, each Defendant must: submit additional compliance reports or other
15 requested information, which must be sworn under penalty of perjury;
16 appear for depositions; and produce documents for inspection and copying.
17 The FTC is also authorized to obtain discovery, without further leave of
18 court, using any of the procedures prescribed by Federal Rules of Civil
19 Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and
20 69.
- 21 B. For matters concerning this Order, the FTC is authorized to communicate
22 directly with each Defendant. Defendant must permit representatives of the
23 FTC to interview any employee or other person affiliated with any
24 Defendant who has agreed to such an interview. The person interviewed
25 may have counsel present.
- 26 C. The FTC may use all other lawful means, including posing, through its

1 representatives as consumers, suppliers, or other individuals or entities, to
2 Defendants or any individual or entity affiliated with Defendants, without
3 the necessity of identification or prior notice. Nothing in this Order limits
4 the FTC's lawful use of compulsory process, pursuant to Sections 9 and 20
of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

5 D. Upon written request from a representative of the FTC, any consumer
6 reporting agency must furnish consumer reports concerning Individual
7 Defendant, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15
8 U.S.C. §1681b(a)(1).

9 **RETENTION OF JURISDICTION**

10 . **IT IS FURTHER ORDERED** that this Court retains jurisdiction of this matter for
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