

et al.

**PLAINTIFF FEDERAL TRADE
COMMISSION'S MOTION FOR
CONTEMPT SANCTIONS AGAINST
JAMES D. NOLAND, JR., SCOTT
HARRIS, THOMAS SACCA, SUCCESS
BY MEDIA HOLDINGS INC., AND
SUCCESS BY MEDIA LLC**

TABLE OF AUTHORITIES

Cases

FTC v. Affordable Media

FTC v. BlueHippo Funding, LLC

FTC v. BurnLounge, Inc.

FTC v. Data Med. Capital, Inc

FTC v. EDebitPay, LLC

FTC v. Equinox Int'l Corp

FTC v. Figgie, Int'l

FTC v. John Beck Amazing Profits, LLC

FTC v. Leshin,

FTC v. Trudeau

McComb v. Jacksonville

McGregor v. Chierico

Regal Knitwear Co. v. NLRB

Sec. Life Ins. Co. of Am. v. Duncanson & Holt, Inc.

Shillitani v. United States

United States v. Asay

United States v. Baker,

United States v. United Mine Workers of Am.,

Rules

Treatises

Id.

Id.

Id.

FTC v. Noland

First

Second

I. LEGAL STANDARD

Shillitani v. United States

FTC v. Noland, et al.

FTC v. Affordable Media

Id

United

States v. Asay

See, e.g. United States v. Ayres

Id.

see also Sec. Life Ins. Co. of Am. v. Duncanson & Holt, Inc.

II. STATEMENT OF FACTS

A. Noland's and Harris' History of Pyramid Schemes and Deception.

FTC v. Equinox Int'l Corp

violated

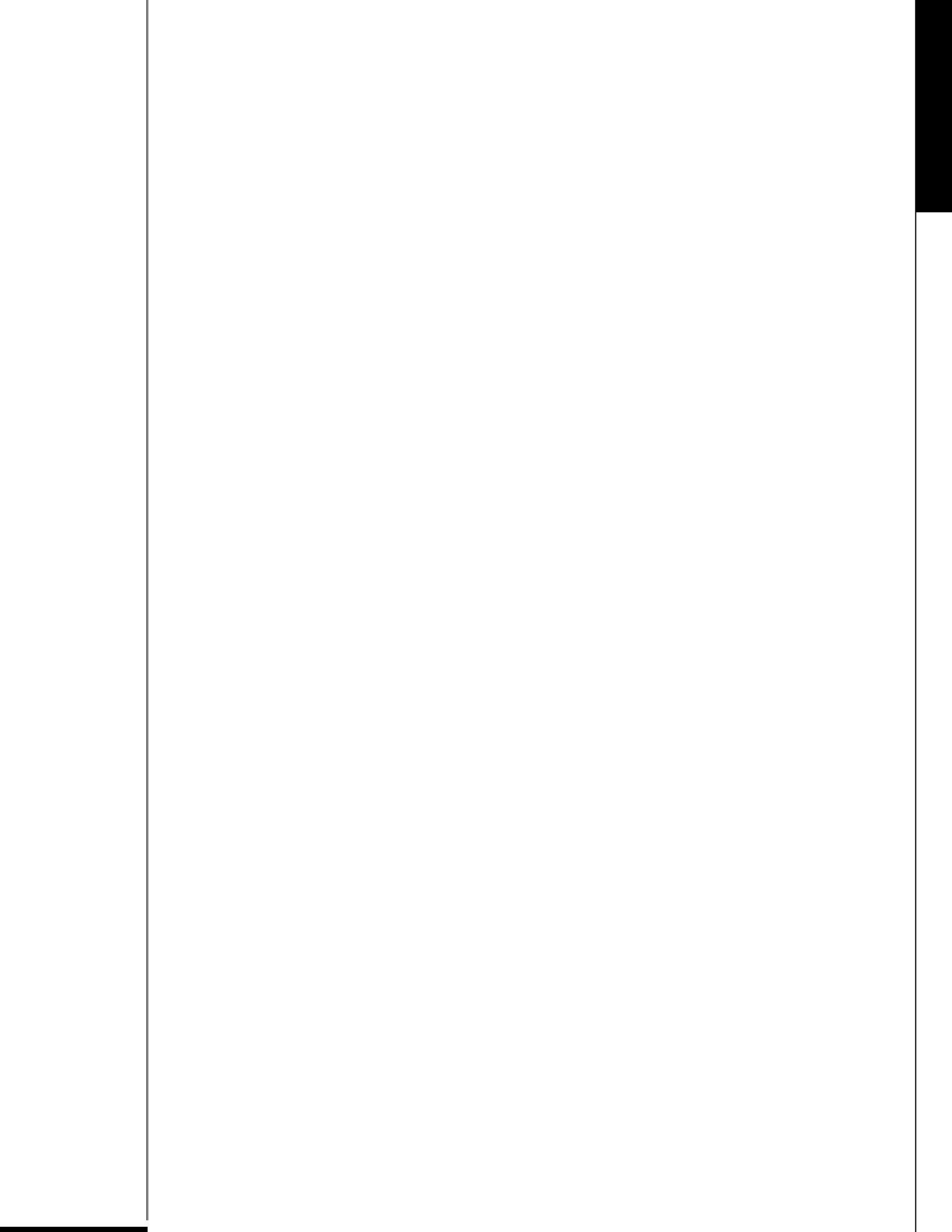
willfully violated

willfully

see also

B. Contempt Defendants' Schemes

i.e.



or

subject to their control or if (Tf0.00) has 3 (Sbi) 0.6 added (y) Tc 0s. TJI (P) follows Tf0 Tc 0 T pri

C. Contempt Defendants Violated Section II by Misrepresenting Potential Income to Consumers

See

supra

D. Contempt Defendants Violated Section III by Providing the Means and Instrumentalities to Others To Violate the Final Order.

Id.

E. Contempt Defendants Violated Section V by Failing to Monitor and Ensure Compliance with the Final Order and by Not Investigating, Tracking, and Resolving Consumer Complaints.

Id

e.g.

See Figgie,

FTC v. BlueHippo Funding, LLC

See

i.e.

See id.

