

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

FEDERAL TRADE COMMISSION and

OFFICE OF THE ATTORNEY GENERAL,  
STATE OF FLORIDA,  
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiffs,

v.

STARWOOD CONSULTING, LLC, a limited  
liability company, also d/b/a CORPORATE  
COMPLIANCE SERVICES,

CORPORATE POSTER SUPPLY, LLC, a limited  
liability company, also d/b/a CORPORATE  
COMPLIANCE SERVICE CENTER,  
CORPORATE COMPLIANCE SERVICES  
CENTER, and WORKPLACE COMPLIANCE  
SERVICES,

STARWOOD CAPITAL, LLC, a limited liability  
company, also d/b/a STARWOOD  
MANAGEMENT SERVICES, and

THOMAS HENRY FRED, JR., individually and as  
an officer of STARWOOD CONSULTING, LLC,

Defendants.

Case No. 4:18-cv-02368

**PLAINTIFFS' UNOPPOSED MOTION TO ENTER STIPULATED ORDER FOR  
PERMANENT INJUNCTION AND MONETARY RELIEF**

The Federal Trade Commission and the Office of the Attorney General, State of Florida,  
Department of Legal Affairs, respectfully submit the attached proposed Stipulated Order for  
Permanent Injunction and Monetary Jlr

The Stipulated Order resolves all matters in dispute between Plaintiffs and Defendants in this action. Plaintiffs' counsel recommended the Stipulate Order to their respective entities, the Florida Attorney General and the full Commission, and both entities have now reviewed and approved the Stipulated Order. Therefore, Plaintiffs respectfully request that this Court enter the Stipulated Order.

Respectfully submitted,

Dated: December 9, 2019

ALDEN F. ABBOTT  
General Counsel  
DAMA J. BROWN  
Regional Director

/s/ Luis Gallegos  
LUIS H. GALLEGOS  
Attorney in Charge  
Oklahoma Bar No. 19098  
REID TEPFER  
Texas Bar No. 24079444  
Federal Trade Commission  
1999 Bryan Street, Suite 2150  
Dallas, Texas 75201  
(214) 979-9383; lgallegos@ftc.gov  
(214) 979-9395; rtepfer@ftc.gov  
(214) 953-3079 (fax)

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

ASHLEY MOODY  
ATTORNEY GENERAL  
/s/ Laura Boeckman  
Laura J. Boeckman, Esq.  
Attorney in Charge  
FBN# 527750  
Assistant Attorney General  
North Florida Bureau Chief  
1300 Riverplace Blvd., Suite 405

