

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

STEVEN J. BRANSFIELD, et al.,

Case No. _____

**STIPULATED ORDER FOR
PERMANENT INJUNCTION AND
MONETARY JUDGMENT AS TO**

Federal Trade CommissT p (i4 (dea [(s)1 (tip)2 (u)2 (la

Zuckman and Alpha Quad admit the facts necessary to establish jurisdiction.

D. Zuckman and Alpha Quad waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to bear their own costs and attorney fees.

E. Zuckman, Alpha Quad and the FTC waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

For the purpose of this Order, the following definitions apply:

A. “

Transaction Management USA, Inc., MOBETraining.com, Inc., 9336-0311 Quebec Inc.,
MOBE Pro Limited, MOBE Inc., MOBE Online Ltd., Matt Lloyd Publishing.com Pty Ltd.,
Matthew Lloyd McPhee a/k/a Matt Lloyd, Russell W. Whitney, and Susan Zanghi.

F. **“Settling Defendants”** means Zuckman and Alpha Quad, individually,
collectively or in any combination.

G. **“Zuckman”** means individual Defendant Scott Alan Zuckman.

ORDER

**I. BAN ON SALE OR MARKETING OF BUSINESS COACHING PROGRAMS
AND MONEY-MAKING METHO.9 (G)5.9AGUSINPIy.9 BaNs ckm2-11p4 (F)9 .a Quad**

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

A. That consumers who purchase any goods or services will earn or are likely to earn substantial income;

B. Any other fact material to consumers concerning any good or service, such as: the total costs; any refund policy; any material restrictions, limitations, or conditions; or any material aspect of its performance, efficacy, nature, or central characteristics.

III. MONETARY JUDGMENT

A.

statements and related documents (collectively, "Financial Representations") submitted to the Commission, namely:

1. the Financial Statement of Zuckman signed on August 29, 2019 and sent to FTC counsel on August 30, 2019, including attachments or addendums, and Zuckman's tax returns for the years 2016 thru 2018;
2. the Financial Statement of Corporate Defense Alpha Quad Enterprises Inc., signed by Zuckman on August 29, 2019, including its tax return for the year 2018;
3. the Financial Statement of Cedar Estates, LLC, signed by Zuckman on August 29, 2019, including its tax return for the year 2018;
4. the Financial Statement of DS9 Enterprises, Inc., signed by Zuckman on August 29, 2019, including its tax return for the year 2018;
5. the Financial Statement of Next Generation Enterprises, signed by Zuckman on August 29, 2019, including attachments or addendums, and its tax return for the year 2018;
6. the Financial Statement of Next Gen Holdings, LLC, signed by Zuckman on August 29, 2019, including attachments or addendums, and its tax return for the year 2018;
7. the Financial Statement of Reynolds Road, LLC, signed by Zuckman on August 29, 2019, including its tax return for the year 2018;
8. the Financial Statement of Voyager Enterprises, signed by Zuckman on August 29, 2019, including its tax return for the year 2018;

an action by the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order will have collateral estoppel effect for such purposes.

I. Settling Defendants acknowledge that their Taxpayer Identification Numbers (Social Security Number or Employer Identification Number) may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

J. All money paid to the Commission pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for equitable relief, including consumer redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining money for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to Defendants' practices alleged in the Complaint. Any money not used for such equitable relief is to be deposited to the U.S. Treasury as disgorgement. Settling Defendants have no right to challenge any actions the Commission or its representatives may take pursuant to this Subsection.

IV. CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Settling Defendants, their officers, agents, employees, and attorneys, and all other persons in concert or participation with any of them, who receive actual notice of this Order are permanently restrained and enjoined from directly or indirectly

any other proceedings that a Commission representative may reasonably request upon 5 days written notice, or other reasonable notice, at such places and times as a Commission representative may designate, without the service of a subpoena.

VI. ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that Settling Defendants obtain acknowledgments of receipt of this Order:

A. Each Settling Defendant, within 7 days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For 10 years after entry of this Order, Zuckman for any business that he, individually or collectively with any other Defendants or any MOBE Defendant the majority owner or controls directly or indirectly, Alpha Quad must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for conduct related to the subject matter of the Order and all agents and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within 7 days of (t)-6 (er)J -0.0C a

VII. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Settling Defendants undertake timely submissions to the Commission:

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

1. Each Settling Defendant must (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Settling Defendant; (b) identify all of that Settling 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 or any MOBE Defendant ~~Zwick~~ ~~Chan~~ must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how that Settling Defendant is in compliance with each Section of this Order;

and Internet addresses, including all residences; (b) identify all

IX. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purposes of monitoring Settling Defendants' compliance with this Order, including the financial representations upon which part of the judgment was suspended, and any failure to transfer any assets as required by this Order:

A. Within 14 days of receipt of a written request from representative of the Commission, each Settling Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. The Commission is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission is authorized to communicate directly with each Settling Defendant. Settling Defendants must permit representatives of the Commission to interview any employee or other person affiliated with any Defendant or any MOBE Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission may use all other lawful means, including posing, through its representatives as consumers, suppliers, or other individuals, to Settling Defendants or any individual or entity affiliated with Settling Defendants, 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.
