Accordingly,

**IT IS ORDERED** that the Stipulation to Enter Final Order of Permanent Injunction and Settlement of Claims as to Defendants Veritas Sales, Inc., Adam Pollicino, and Anthony Clavien (Doc. 71) is **GRANTED**.

## **FINDINGS**

By stipulation of the parties, **THE COURT FINDS** as follows:

- 1. This Court has jurisdiction over this matter.
- 2. The Complaint charges that the Settling Defendants participated in deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, in connection with the marketing and sale of academic degree and certification programs.
- 3. The Settling Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, the Settling Defendants admit the facts necessary to establish jurisdiction.
- 4. The Settling Defendants 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.
- 5. The Settling Defendants waive all rights to appeal or otherwise challenge or contest the validity of this Order.
- 6. Entry of this Order is in the public interest.

## **DEFINITIONS**

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

A. "Academic Degree or Certification Program" means any product, service, plan, or program that provides or purports to provide doctoral degrees, master's degrees, bachelor's degrees, associate's degrees, high school diplomas or high school equivalency diplomas or certificates, certifications, certificates, or any other document that confers or purports to confer a qualification, records or purports to record success in examinations or successful completion of a course of study, or

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evidences or purports to evidence that a consumer has completed and shown proficiency in a curriculum recognized as necessary to earn the indicated degree, diploma, certification, certificate, or other document, whether denominated as a degree, diploma, certification, certificate, or other name, whether denoted as a real or novelty item.

- B. "Customer" means any person who has paid, or may be required to pay, for products, services, plans, or programs offered for sale or sold by any other person.
- C. "Defendants" means Capitol Network Distance Learning Programs, LLC, Capital Network Digital Licensing Programs, LLC, Veritas Sales, Inc., Nicholas Pollicino, Anthony Clavien, and Adam Pollicino, individually, collectively, or in any combination.
- D. "**Person**" means a natural person, organization, or other legal entity, including a corporation, partnership, proprietorship, association, cooperative, or any other group or combination acting as an entity.
- E. "Settling Defendants" means the Individual Settling Defendants and the Corporate Settling Defendant, individually, collectively, or in any combination. "Corporate Settling Defendant" means Veritas Sales, Inc. and its successors and assigns. "Individual Settling Defendants" means Anthony J. Clavien and Adam F. Pollicino, and any other name by which they may be known.

## **ORDER**

BAN ON ACADEMIC DEGREE OR CERTIFICATION PROGRAIndividual Settling Def

of this Order, make a one-time transfer to the FTC or its designated agent of all funds, if any, in: (a) account number xxxx0355 in the name of Veritas Sales, Inc.; (b) account number xxxx1767 in the name of Veritas Sales, Inc.; (c) account number xxxx1809 in the name of Veritas Sales, Inc.; (d) account number xxxx9328 in the name of Veritas Sales, Inc.; (e) account number xxxx0470 in the name of AFP Inc.; (f) account number xxxx0504 in the name of AFP Inc.; (g) account number xxxx1320 in the name of Valais Consulting, Inc.; (h) account number xxxx3631 in the name of Valais Consulting, Inc.; (i) account number xxxx6126 in the name of Adam Pollicino; (j) account number xxxx9541 in the name of Adam Pollicino; and (k) account number xxxx9207 in the name of Anthony Clavien. Upon such transfers, this Order shall impose no further restrictions on such accounts.

- 4. JP Morgan Chase Bank shall, within ten (10) business days of receipt of a copy of this Order, make a one-time transfer to the FTC or its designated agent of all funds, if any, in: (a) account number xxxx2251 in the name of AFP, Inc.; (b) account number xxxx8626 in the name of AFP, Inc.; and (c) account number xxxx7655 in the name of Anthony Clavien. Upon such transfers, this Order shall impose no further restrictions on such accounts.
- 5. Deutsches Bank shall, within ten (10) business days of receipt of a copy of this Order, make a one-time transfer to the FTC or its designated agent of all funds, if any, in account number xxxx5790 in the name of Anthony Clavien. Upon such transfer, this Order shall impose no further restrictions on such account.;
- C. Upon completion of the asset transfers set forth in Section III.B of this Order, the

are permanently restrained and enjoined from directly or indirectly:

- A. Disclosing, using, or benefitting from customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a customer's account (including a credit card, bank account, or other financial account), that any Defendant obtained prior to entry of this Order in connection with the marketing and sale of any academic degree or certification program; and
- B. Failing to destroy such customer information in all forms in their possession, custody, or control within 30 days after receipt of written direction to do so from a representative of the FTC.

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

## ORDER ACKNOWLEDGMENTS

- V. IT IS FURTHER ORDERED that the Settling Defendants obtain acknowledgments of receipt of this Order:
  - A. Each Settling Defendant, within 7 days of lethers. 67RH is Doctor (0nTid (Eabhr Stetto) (Doirectly or of the control of the

D. All records necessary