

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division

FEDERAL TRADE COMMISSION,)
)

Respectfully submitted,

SUZANNE MUNCK
Deputy Director
Office of Policy Planning

NEAL HANNAN
Office of Policy Planning

Dated: September 4, 2015

JONATHAN E. NUECHTERLEIN
General Counsel

DAVID C. SHONKA
Principal Deputy General Counsel

JOEL MARCUS
Director of Litigation

LESLIE RICE MELMAN
Assistant General Counsel for Litigation

s/ Burke W. Kappler
BURKE W. KAPPLER
Assigned bar number 801057

BRADLEY GROSSMAN
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600 Pennsylvania Ave., N.W.
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CERTIFICATE OF SERVICE

I certify that on September 4, 2015, I sent a copy of the Application of the Federal Trade Commission for Clerk's Entry of Default Against Respondent The Medici Portfolio, LLC, and supporting affidavit and exhibits, to The Medici Portfolio, LLC by e-mail and FedEx overnight delivery to the following addresses:

Michael Connelly, Chief Executive Office
The Medici Portfolio, LLC
4601 Willard Avenue
Chevy Chase, MD 20815
E-mail: mike@mediciportfolio.com.

s/ Burke W. Kappler
BURKE W. KAPPLER
Assigned bar number 801057

Attorney for Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580
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serve a certified copy of the Order and a copy of the petition and supporting documents on Medici by “overnight express delivery service.” Id. at 3.

4. On the same day the Court issued the Order to Show Cause, I e-mailed Michael Connelly, Medici’s Chief Executive Officer, a courtesy copy of the Court’s Order, the FTC’s petition, and its supporting papers. Exh. 1. On August 12, I made arrangements with FedEx to hand deliver a certified copy of the Court’s Order to Show Cause and a copy of the FTC’s petition and its supporting papers. Exh. 2. The FedEx package was delivered to Medici at its Chevy Chase offices on August 14. Exh. 3.
5. On August 11, Mr. Connelly acknowledged my courtesy e-mail and stated that he had mailed the materials at issue. Exh. 4. To date, however, the FTC has not received the materials. Furthermore, Medici has not filed a response to the Court’s Order to Show Cause or sought an extension to the due date for its response.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on September 4, 2015

s/ Burke W. Kappler

EXHIBIT 1

EXHIBIT 2



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Burke W. Kappler
Attorney
Office of General Counsel

Direct Dial: 202-326-2043
Fax : 202-326-2477
E-mail: bkappler@ftc.gov

August 12, 2015


BY FED EX

Michael Connelly
Medici Portfolio, LLC
4601 Willard Avenue
Chevy Chase, MD 20815
Tel: 1-800-961-5462

Re: _____

EXHIBIT 3

Company name: FTC
Name: B. Kappler
Email: tlewis@ftc.gov

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