

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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FEDERAL TRADE COMMISSION

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1 of an injunction. *Id.* at 1160; *see also F.T.C. v. World Wide Factors*, 882 F.2d 344, 346 (9th
2 Cir. 1989).

3 A court's authority to grant injunctive relief under Section 502(d)
4 of the Copyright Act, 17 U.S.C. § 502(d), is an exercise of the court's equity
5 jurisdiction. *F.T.C. v. H.N. Singer, Inc.*, 668 F.2d 1107, 1112 (9th Cir. 1982) (citations
6 omitted). One such power is the authority to freeze a defendant's assets. *Id.* at 1113; *F.T.C. v.*
7 *Evans Prods. Co.*, 775 F.2d 1084, 1088±89 (9th Cir. 1985). As the Ninth Circuit emphasized in
8 *H.N. Singer*, 668 F.2d at 1112±13, such an order is an equitable
9 remedy. *See* 668 F.2d at 1112±13. Such an order is an equitable

10 relief, other than a preliminary injunction restraining future violations of the law, when there is

11 no such threat. *Evans Prods.*, 775 F.2d at 1088. Such an order is an equitable

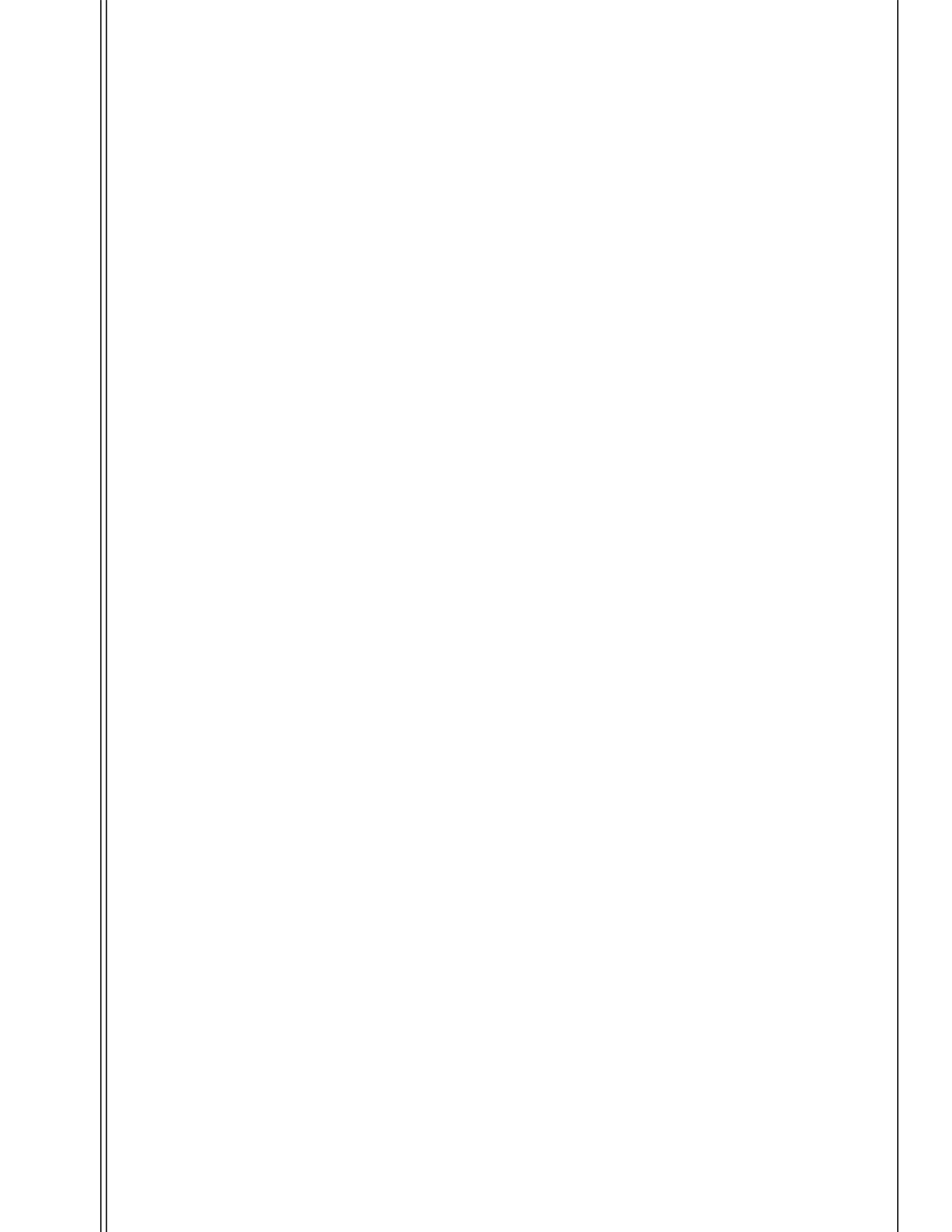
12 must show a likelihood of dissipation of the claimed assets, or other inability to recover

13 the assets. *Johnson v. Couturier*, 572 F.3d 1067, 1085 (9th
14 Cir. 2009).

15 **III. DISCUSSION**

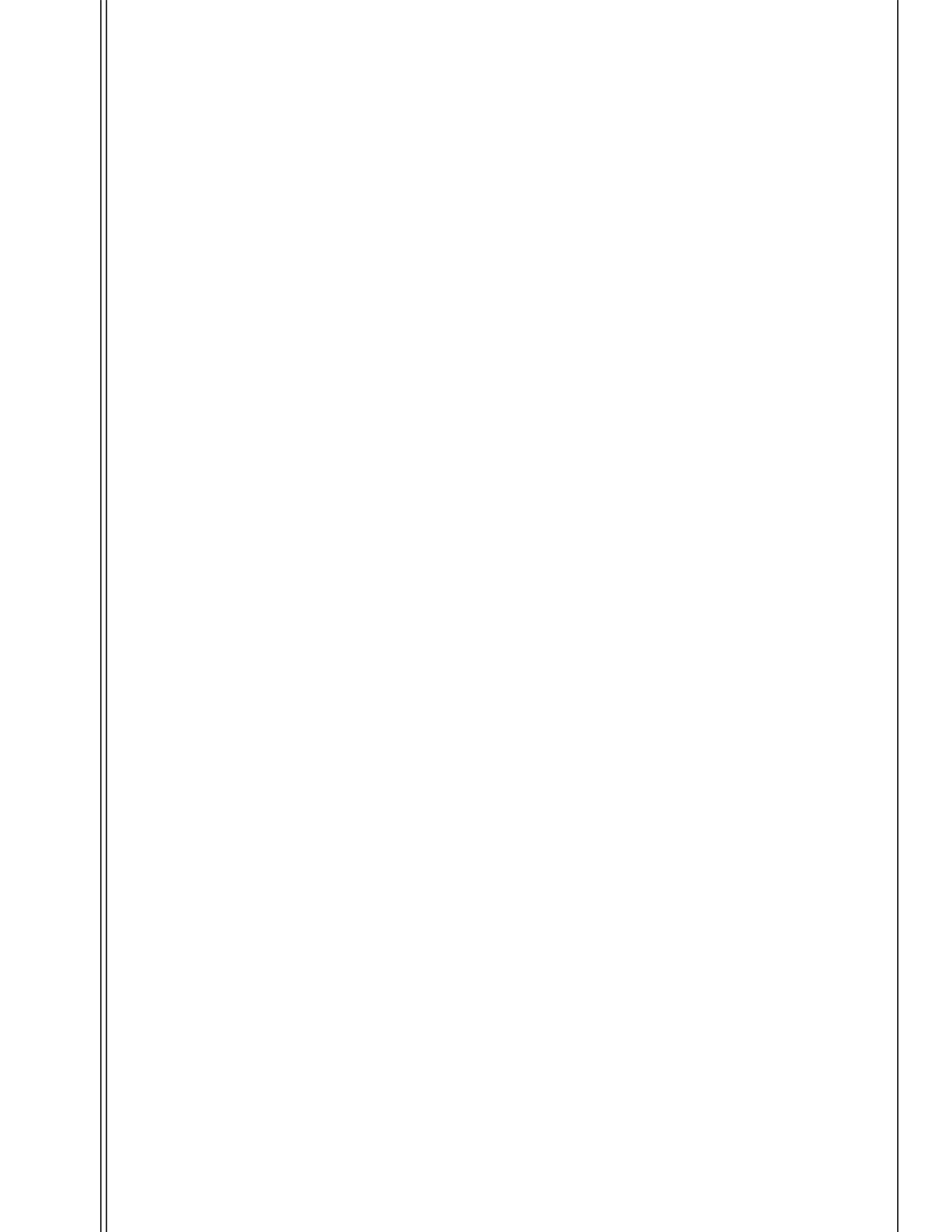
16 **A. Likelihood of Success on the Merits**

17 The FTC has held that a false or misleading statement is material if it is likely to
18 material misrepresentation or omission that is likely to mislead consumers acting reasonably
19 under the circumstances. *FTC v. Stefanichik*, 559 F.3d 924, 928 (9th Cir. 2009). A
20 misrepresentation is material if it involves facts that a reasonable person would consider
21 important in choosing a course of action. *See FTC v. Cyberspace.com LLC*, 453 F.3d 1196,
22 1201 (9th Cir. 2006). Express claims are presumed material, so consumers are not required to
23 question their veracity to be deemed reasonable. *See Pantron I*, 33 F.3d 1088, 1095±96 (9th
24 Cir. 1994). Furthermore, the FTC need not prove reliance by each consumer misled by
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1 The Court finds that the FTC has satisfied its burden of demonstrating a likelihood of
2 success on the merits of its claims, and considers each claim in turn.

3 *1) Misrepresentations Regarding Journal Publishing*
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1 articles to more reputable journals. (See Mot. for Prelim. Inj. 12:23±27). The Court therefore
2 finds that the evidence in the record is sufficient to support a preliminary conclusion that
3 Defendants deceptively fail to disclose publishing fees.

4 *3) Misrepresentations Regarding Conferences*

5 The evidence produced by the FTC demonstrates that Defendants engaged in probable
6 misrepresentations regarding their conferences. Notably, the FTC has provided evidence
7 indicating that Defendants advertise the attendance and participation of prominent academics
8 and researchers without their permission or actual affiliation. (See PX05 ¶¶ 3,5; PX12 Att. U at
9 1045). In numerous instances, individuals have requested unsuccessfully to have their names

10 ~~REDACTED~~ See, e.g., PX03 ¶¶ 6±12). Often,
11 ~~REDACTED~~ See, e.g., PX05
12 ¶ 7). ~~REDACTED~~

13 participate in or be affiliated with Defendants' conferences. The Court therefore finds that the
14 evidence in the record is sufficient to support a preliminary conclusion that Defendants made
15 misrepresentations regarding their conferences.

16 *4) Defendants Engaged in a Common Enterprise*

17 ~~REDACTED~~ constitute a common enterprise when they exhibit either vertical or horizontal
18 commonality² qualities that may be demonstrated by a showing of strongly interdependent

19 ~~REDACTED~~ F.T.C. v. Network Servs. Depot, Inc.,
20 617 F.3d 1127, 1142±43 (9th Cir. 2010). In deciding whether a common enterprise exists,

21 courts may consider such factors as whether the companies were under common ownership and
22 control; whether they pooled resources and staff; whether they shared phone numbers,

23 ~~REDACTED~~
24 which they benefited from a shared business scheme or referred customers to one another. *Id.* at
25 1243. Where the same individuals transact business ~~REDACTED~~

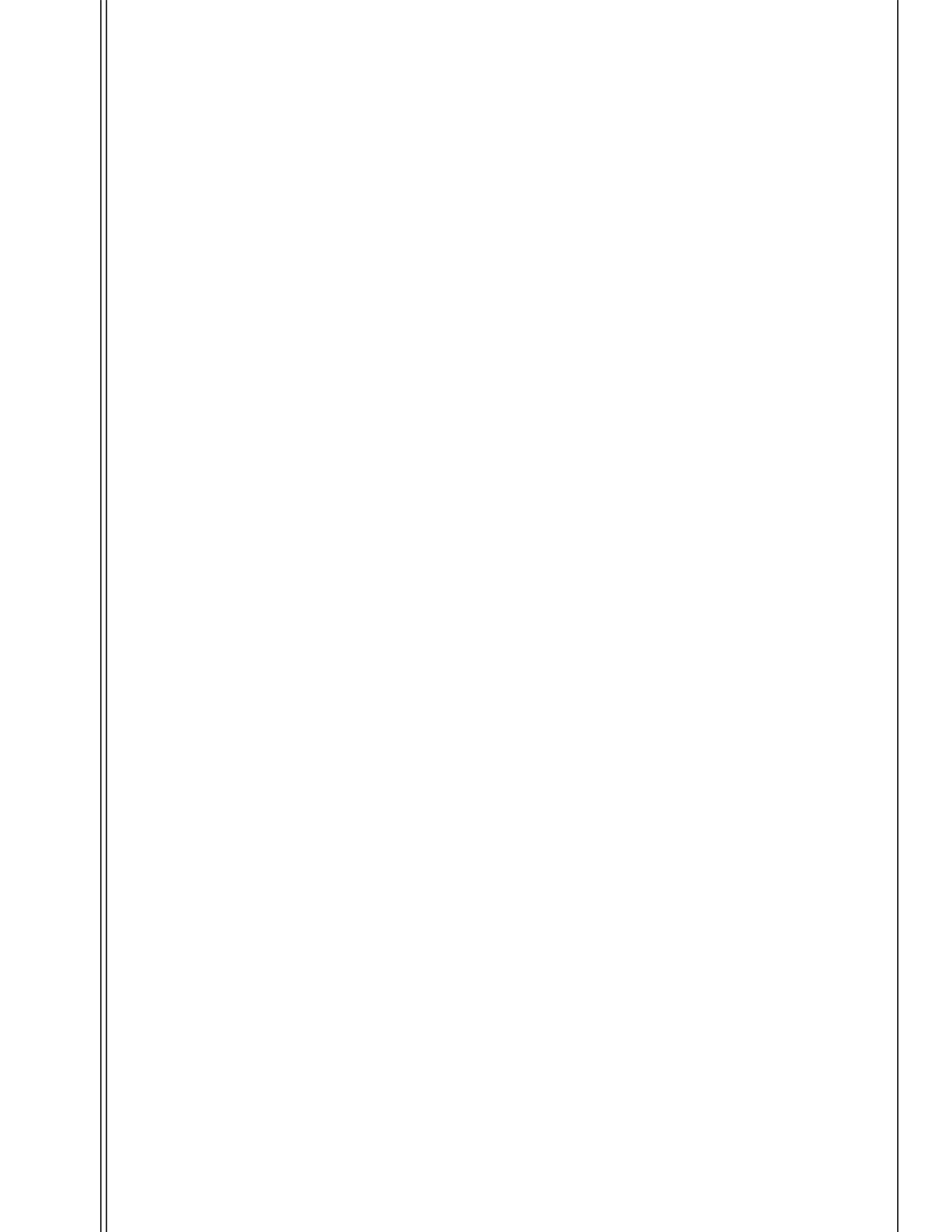
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1 5) *Geddes* Liability for Injunctive and Monetary Relief

2 Personal liability for violations of the FTC Act fall into two categories: liability for
3 injunctive relief and liability for monetary relief. Individuals are liable for injunctive relief if
4 they directly participate in the deceptive acts or have the authority to control them. *F.T.C. v.*

5 ~~3000~~ , 104 F.3d 1168, 1170 : 598.12 792 reW* nBT0 gC2_2 reW* nBT0 gTT4 1

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1 Defendants argue that the Complaint fails to adequately allege that Defendants engaged
2 in unfair or deceptive practices. (M¶ Mot. to Dismiss 5:8±14). Moreover, Defendants argue
3 that the undisputed facts demonstrate that Defendants, in fact, have not engaged in unfair or
4 deceptive practices. (*Id.* 5:15±22). ~~AVQDEGVD8Q2GSDQ~~
5 argument concerning the sufficiency of the evidence against them fails. The issue then turns on
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1 defendants based on their function in a scheme and then give sufficient detail of the alleged
2 scheme. *Id.* at *5.

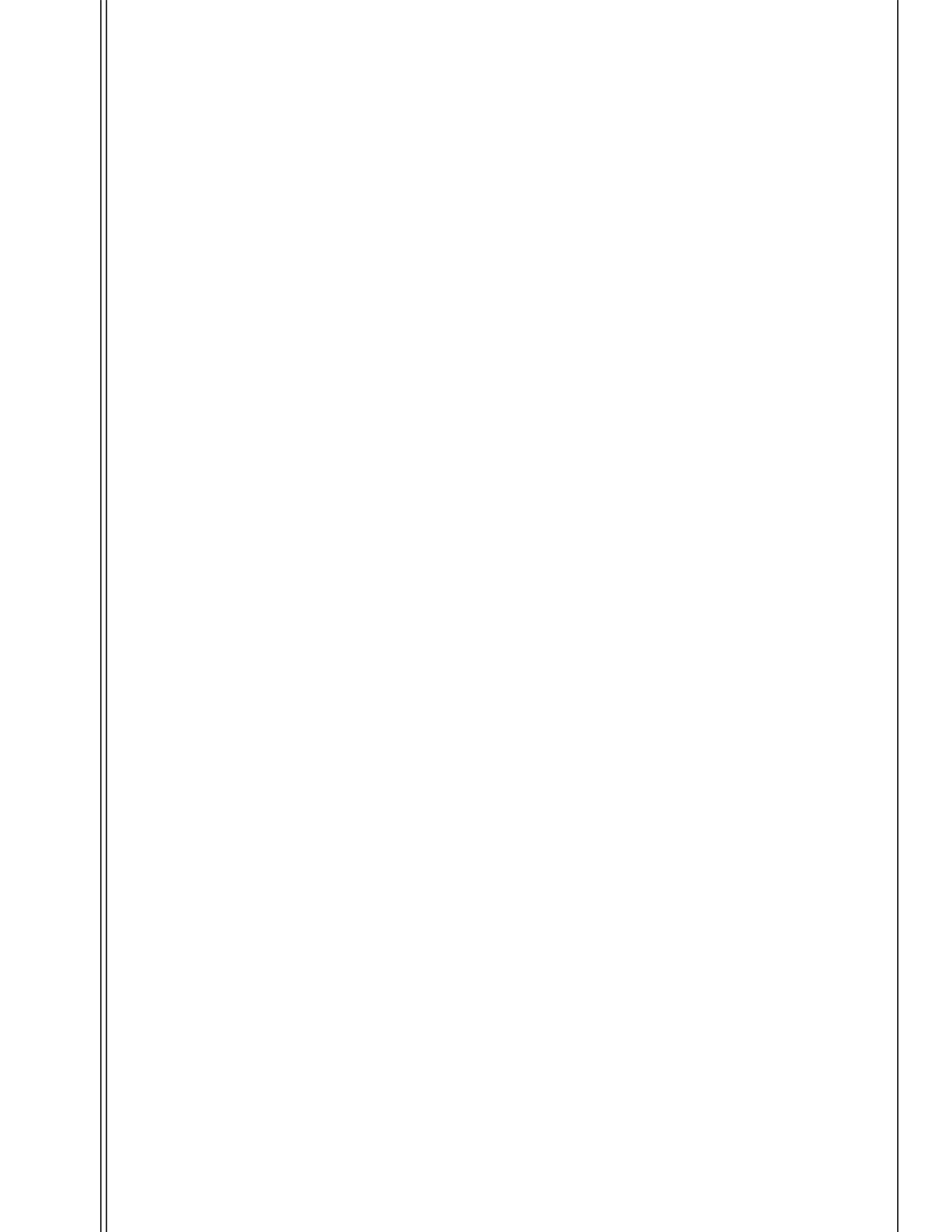
3 Here, given the nature of the allegations, the Court finds that the relaxed *Moore* standard
4 applies. The allegations in the Complaint span across multiple years and involve a substantial
5 number of allegedly wronged consumers. Moreover, the facts concerning Gedela's specific
6 actions in the scheme were reasonably unattainable at the initial pleading stage. With respect to
7 the Corporate Defendants, the Complaint meets the 9(b) standard by establishing that all
8 allegations apply to each Defendant as part of an alleged joint scheme. Notably, the Complaint
9 sufficiently alleges the same FRP theory as discussed above. (See Compl. ¶¶
10 6±10). Under the common enterprise theory, EDV theory for
11 for not particularizing allegations to each Corporate Defendant is misplaced, as each are liable
12 for the scheme as a whole. *See John Beck*, 865 F. Supp. 2d at 1082.

13 Accordingly, and upon review, the Court finds that the Complaint provides Defendants
14 sufficient detail to prepare an adequate answer to the allegations and complies with the
15 pleading requirements. *Moore*, 885 F.2d at 540. Furthermore, the allegations in the Complaint
16 clearly establish the requis FDEP under Section 5(a). Based on the
17 foregoing, the EDV Motion PLVDQDQDQD
18 Preliminary Injunction. The Court shall issue a preliminary injunction consistent with the
19 definitions set forth below.

20 **IV. DEFINITIONS**

21 1. ³ **Clearly and Conspicuously** means that a required disclosure is difficult to miss
22 (i.e., easily noticeable) and easily understandable by ordinary consumers, including in all of the
23 following ways:

- 24 a. In any communication that is solely visual or solely audible, the disclosure
25 must be made through the same means through which the communication is



1 Group Inc., also doing business as OMICS Publishing Group, iMedPub LLC, and Conference

2 ~~6M//BQMRFMVEDQDVVQDZBQDQHQ6BQD~~

3 and any other name by which he might be known.

4 3. ~~PDFDFW~~ ~~ESDFWB~~ means, with respect to any journal or other
5 publication, any measure reflecting the number or average number of citations (whether
6 weighted or not) to articles published in that journal or publication during a certain period of
7 time, including, but not limited to, the score assigned to a journal by Thomson Reuters and

8 ~~ESQVEMRQDQDMRQDFRDR~~

9 Journal Rank.

10 4. ~~3MR~~ means a natural person, organization, or other legal entity, including a
11 corporation, partnership, proprietorship, association, cooperative, or any other group or
12 combination acting as an entity.

13 **V. CONCLUSION**

14 **IT IS HEREBY ORDERED ~~ADQDQPLVLR~~**
15 **DENIED.**

16 **IT IS FURTHER ORDERED ~~QWQEQQEQ~~** (ECF
17 No. 9) is **GRANTED** pursuant to the following terms:

18
19 **PROHIBITED MISREPRESENTATIONS REGARDING PUBLISHING SERVICES**

20 **I. IT IS HEREBY ORDERED** that ~~EDQDQDQDQDQD~~
21 and attorneys, and all other Persons in active concert or participation with any of them, who
22 receive actual notice of this Order, whether acting directly or indirectly, in connection with
23 promoting or offering for sale any publishing good or service are hereby preliminarily
24 restrained and enjoined from:

- 25 1. misrepresenting or assisting others in misrepresenting, expressly or by implication:

- 1 a. the nature, credibility, legitimacy, or reputation of any journal or other
2 publication;
- 3 b. that any journal or other publication follows or otherwise engages in peer
4 review or any other process by which work product submitted to that journal
5 or publication is reviewed;
- 6 c. that any Person is an editor of, a member of an editorial board for, or
7 otherwise associated or affiliated with any journal or other publication;
- 8 d. that any Person is involved in the selection or review of any article,
9 manuscript, or other work product submitted for publishing in any journal or
10 other publication;
- 11 e. the Impact Factor or Impact Score of any journal or other publication, or that
12 any journal or other publication has a high Impact Factor or Impact Score;
- 13 f. the inclusion of any journal or other publication in any academic journal
14 indexing service, including but not limited to PubMed, PubMed Central, or
15 MEDLINE;
- 16 g. any costs or fees associated with publishing an article, manuscript, or other
17 work product;
- 18 h. any material restrictions, limitations, or conditions on publishing an article,
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1 who are subject matter experts, who are not journal employees, and who evaluate the
2 quality and credibility of the work product, and the representation is otherwise non-
3 misleading;

- 4 3. making, or assisting others in making, expressly or by implication, any
5 representation covered by this Section I, unless the representation is non-misleading
6 and, at the time such representation is made, Defendants possess and rely upon
7 competent and reliable evidence that is sufficient to substantiate that the
8 representation is true.

9
10 **PROHIBITED MISREPRESENTATIONS REGARDING SCIENTIFIC**
11 **CONFERENCES**

12 **II. IT IS FURTHER ORDERED ~~AND ORDERED~~**

13 employees, and attorneys, and all other Persons in active concert or participation with any of
14 them, who receive actual notice of this Order, whether acting directly or indirectly, in
15 connection with promoting, registering, or accepting fees for any scientific or academic
16 conference are hereby preliminarily restrained and enjoined from:

- 17 1. misrepresenting or assisting others in misrepresenting, expressly or by implication:
18 a. the nature, credibility, legitimacy, or reputation of any conference,
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- d. any costs or fees to register or attend any conference, symposium, forum, workshop, or other meeting of professionals;
- e. any material restrictions, limitations, or conditions on registering or attending any conference, symposium, forum, workshop, or other meeting of professionals; or
- f. ~~DEFENDANT'S~~ conference, symposium, forum, workshop, or other meeting of professionals;

2. making, or assisting others in making, expressly or by implication, any representation covered by this Section II, unless the representation is non-misleading and, at the time such representation is made, Defendants possess and rely upon competent and reliable evidence that is sufficient to substantiate that the representation is true.

REQUIRED DISCLOSURES REGARDING PUBLISHING PRACTICES

III. IT IS FURTHER ORDERED that ~~DEFENDANT'S~~

employees, and attorneys, and all other Persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, are hereby preliminarily restrained and enjoined from soliciting from a consumer or publishing articles, manuscripts, or other work product for publication, without disclosing Clearly and conspicuously:

- 1. all costs to the consumer associated with submission or publication of such work product;
- 2. if Defendants will not have such work product reviewed by peers who are subject matter experts, who are not journal employees, and who evaluate the quality and credibility of the work product, a statement informing consumers of such fact; and

1 3. if Defendants will not allow consumers to withdraw such work product from
2 publication after it has been submitted, a statement informing consumers of such fact.

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4 **REQUIRED DISCLOSURES REGARDING JOURNAL IMPACT FACTORS**

5 **IV. IT IS FURTHER ORDERED** that ~~EDWARD~~
6 employees, and attorneys, and all other Persons in active concert or participation with any of
7 them, who receive actual notice of this Order, whether acting directly or indirectly, are hereby
8 preliminarily restrained and enjoined from making any representation, expressly or by
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PRESERVATION OF RECORDS AND TANGIBLE THINGS

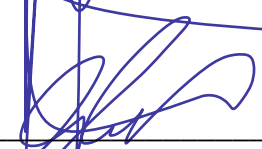
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RETENTION OF JURISDICTION

XII. IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

DATED this _____ day of September, 2017.



Gloria M. Navarro, Chief Judge
United States District Judge

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ATTACHMENT A

FINANCIAL STATEMENT OF INDIVIDUAL DEFENDANT**Definitions and Instructions:**

1. Complete all items. Enter "None" or "N/A" ("Not Applicable") in the first field only of any item that does not apply to you. If you cannot fully answer a question, explain why.
2. "Dependents" include your spouse, live-in companion, dependent children, or any other person, whom you or your spouse (or your children's other parent) claimed or could have claimed as a dependent for tax purposes at any time during the past five years.
3. "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or any foreign country or territory, whether held individually or jointly and whether held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.
4. Attach continuation pages as needed. On the financial statement, state next to the Item number that the Item is being continued. On the continuation page(s), identify the Item number(s) being continued.
5. Type or print legibly.
6. Initial each page in the space provided in the lower right corner.
7. Sign and date the completed financial statement on the last page.

Penalty for False Information:

Federal law provides that any person may be imprisoned for not more than five years, fined, or both, if such person:

(1) "in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or devise a material fact; makes any materially false, fictitious or fraudulent statement or representation; or makes or uses any false writing or document knowing the same to contain any materially false, fictitious or fraudulent statement or entry" (18 U.S.C. § 1001);

(2) "in any . . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true" (18 U.S.C. § 1621); or

(3) "in any (. . . statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information . . . knowing the same to contain any false material declaration" (18 U.S.C. § 1623).

For a felony conviction under the provisions cited above, federal law provides that the fine may be not more than the greater of (i) \$250,000 for an individual or \$500,000 for a corporation, or (ii) if the felony results in pecuniary gain to any person or pecuniary loss to any person other than the defendant, the greater of twice the gross gain or twice the gross loss. 18 U.S.C. § 3571.

Item 7. Pending Lawsuits Filed By or Against You or Your Spouse

List all pending lawsuits that have been filed by or against you or your spouse in any court or before an administrative agency in the United States or in any foreign country or territory. **Note:** At Item 12, list lawsuits that resulted in final judgments or settlements in your favor. At Item 21, list lawsuits that resulted in final judgments or settlements against you.

Caption of Proceeding	Court or Agency and Location	Case No.	Nature of Proceeding	Relief Requested	Status or Disposition

Item 8. Safe Deposit Boxes

List all safe deposit boxes, located within the United States or in any foreign country or territory, whether held individually or jointly and whether held by you, your spouse, or any of your dependents, or held by others for the benefit of you, your spouse, or any of your dependents.

Name of Owner(s)	Name & Address of Depository Institution	Box No.	Contents

Initials: _____

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Item 18. Real Property

List all real property interests (including any land contract)

Property's Location	Type of Property	Name(s) on Title or Contract and Ownership Percentages	
Acquisition Date (mm/dd/yyyy) / /	Purchase Agreement	1111.388 -/B4-2.64Til	Name(19) on Title or Contract and Ownership Percentages
Acquisition Date (mm/dd/yyyy) Ac9m7111.388 -/B4-2.64Til			
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ATTACHMENT B

BACKGROUND INFORMATION

Item 1. General Information

Corporation's Full Name _____

Primary Business Address _____ From (Date) _____

Telephone No. _____ Fax No. _____

E-Mail Address _____ Internet Home Page _____

All other current addresses & previous addresses for past five years, including post office boxes and mail drops:

Address _____ From/Until _____

Address _____ From/Until _____

Address _____ From/Until _____

All predecessor companies for past five years:

Name & Address _____ From/Until _____

Name & Address _____ From/Until _____

Name & Address _____ From/Until _____

Item 2. Legal Information

Federal Taxpayer ID No. _____ State & Date of Incorporation _____

State Tax ID No. _____ State _____ Profit or Not For Profit _____

Corporation's Present Status: Active _____ Inactive _____ Dissolved _____

If Dissolved: Date dissolved _____ By Whom _____

Reasons _____

Fiscal Year-End (Mo./Day) _____ Corporation's Business Activities _____

Item 3. Registered Agent

Name of Registered Agent _____

Address _____ Telephone No. _____

Item 10. Outside Accountants

List all outside accountants retained by the corporation during the last three years.

<u>Name</u>	<u>Firm Name</u>	<u>Address</u>	<u>CPA/PA?</u>

Item 11. Corporation's Recordkeeping

List all individuals within the corporation with responsibility for keeping the corporation's financial books and records for the last three years.

<u>Name, Address, & Telephone Number</u>	<u>Position(s) Held</u>

Item 12. Attorneys

List all attorneys retained by the corporation during the last three years.

<u>Name</u>	<u>Firm Name</u>	<u>Address</u>

Item 13. Pending Lawsuits Filed by the Corporation

List all pending lawsuits that have been filed by the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments or settlements in favor of the corporation in Item 25).

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

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Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____



Item 21. Government Obligations and Publicly Traded Securities

List all U.S. Government obligations, including but not limited to, savings bonds, treasury bills, or treasury notes, held by the corporation. Also list all publicly traded securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by the corporation.

Issuer _____ Type of Security/Obligation _____

No. of Units Owned _____ Current Fair Market Value \$ _____ Maturity Date _____

Issuer _____ Type of Security/Obligation _____

No. of Units Owned _____ Current Fair Market Value \$ _____ Maturity Date _____

Item 22. Real Estate

List all real estate, including leaseholds in excess of five years, held by the corporation.

Type of Property _____ Property's Location _____

Name(s) on Title and Ownership Percentages _____

Current Value \$ _____ Loan or Account No. _____

Lender's Name and Address _____

Current Balance On First Mortgage \$ _____ Monthly Payment \$ _____

Other Loan(s) (describe) _____ Current Balance \$ _____

Monthly Payment \$ _____ Rental Unit? _____ Monthly Rent Received \$ _____

Type of Property _____ Property's Location _____

Name(s) on Title and Ownership Percentages _____

Current Value \$ _____ Loan or Account No. _____

Lender's Name and Address _____

Current Balance On First Mortgage \$ _____ Monthly Payment \$ _____

Other Loan(s) (describe) _____ Current Balance \$ _____

Monthly Payment \$ _____ Rental Unit? _____ Monthly Rent Received \$ _____

Item 23. Other Assets

List all other property, by category, with an estimated value of \$2,500 or more, held by the corporation, including but not limited to, inventory, machinery, equipment, furniture, vehicles, customer lists, computer software, patents, and other intellectual property.

<u>Property Category</u>	<u>Property Location</u>	<u>Acquisition Cost</u>	<u>Current Value</u>
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____

Item 24. Trusts and Escrows

List all persons and other entities holding funds or other assets that are in escrow or in trust for the corporation.

<u>Trustee or Escrow Agent's Name & Address</u>	<u>Description and Location of Assets</u>	<u>Present Market Value of Assets</u>
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____

Item 27. Government Orders and Settlements

List all existing orders and settlements between the corporation and any federal or state government entities.

Name of Agency _____ Contact Person _____

Address _____ Telephone No. _____

Agreement Date _____ Nature of Agreement _____

Item 28. Credit Cards

List all of the corporation's credit cards and store charge accounts and the individuals authorized to use them.

Name of Credit Card or Store

Names of Authorized Users and Positions Held

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Item 29. Compensation of Employees

List all compensation and other benefits received from the corporation by the five most highly compensated employees, independent contractors, and consultants (other than those individuals listed in Items 5 and 6 above), for the two previous fiscal years and current fiscal year-to-date. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, bonuses, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

<u>Name/Position</u>	<u>Current Fiscal Year-to-Date</u>	<u>1 Year Ago</u>	<u>2 Years Ago</u>	<u>Compensation or Type of Benefits</u>
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____

Item 30. Compensation of Board Members and Officers

List all compensation and other benefits received from the corporation by each person listed in Items 5 and 6, for the current fiscal year-to-date and the two previous fiscal years. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, but are not limited to, loans, loan payments, rent, car payments, and insurance premiums, whether paid directly to the individuals, or paid to others on their behalf.

<u>Name/Position</u>	<u>Current Fiscal Year-to-Date</u>	<u>1 Year Ago</u>	<u>2 Years Ago</u>	<u>Compensation or Type of Benefits</u>
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____
_____	\$ _____	\$ _____	\$ _____	_____

Item 31. Transfers of Assets Including Cash and Property

List all transfers of assets over \$2,500 made by the corporation, other than in the ordinary course of business, during the previous three years, by loan, gift, sale, or other transfer.

<u>Transferee's Name, Address, & Relationship</u>	<u>Property Transferred</u>	<u>Aggregate Value</u>	<u>Transfer Date</u>	<u>Type of Transfer (e.g., Loan, Gift)</u>
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____

