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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMERICAN FINANCIAL SUPPORT  
SERVICES INC, et al..

Defendants.

Case No. 8:19-cv-02109-JWH-ADSx

**AMENDED STIPULATED ORDER  
FOR PERMANENT INJUNCTION  
AND MONETARY JUDGMENT AS  
TO DEFENDANTS ARETE  
FINANCIAL GROUP; ARETE  
FINANCIAL GROUP LLC; CBC  
CONGLOMERATE LLC;  
DIAMOND CHOICE INC.; J&L  
ENTERPRISE LLC; LA CASA  
BONITA INVESTMENTS, INC.;  
AND RELIEF DEFENDANT MJ  
WEALTH SOLUTIONS, LLC**

1 Plaintiff the Federal Trade Commission (“Commission” or “FTC”)  
2 filed its Complaint for Permanent Injunction and Other Equitable Relief, for a  
3 permanent injunction and other relief in this matter, pursuant to Sections 13(b)  
4 and 19 of the Federal Trade Commission Act (the “FTC Act”), 15 U.S.C.  
5 §§ 53(b) & 57b. The Commission and Defendants Arete Financial Group; Arete  
6 Financial Group LLC; CBC Conglomerate LLC; Diamond Choice Inc.; J&L  
7 Enterprise LLC; La Casa Bonita Investments, Inc.; and Relief Defendant MJ  
8 Wealth Solutions, LLC (each a “Stipulating Defendant” and, collectively, the  
9 “Stipulating Defendants”) stipulate to the entry of this Stipulated Order for  
10 Permanent Injunction and Monetary Judgment to resolve all matters in dispute  
11 in this action between them.

12 Therefore, it is hereby **ORDERED** as follows:

13 **I. FINDINGS**

14 1. This Court has jurisdiction over this matter.  
15 2. The Complaint charges that Defendants participated in deceptive  
16 acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, and  
17 the Telemarketing Sales Rule, 16 C.F.R. pt. 310, in the marketing and sale of  
18 student loan debt relief services.

19 3. Stipulating Defendants neither admit nor deny any of the  
20 allegations in the Complaint, except as specifically stated in thTw -lPerme. Onin ifid[(r)-t

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5. Stipulating Defendants and the Commission waive all rights to appeal or otherwise challenge or contest the validity of this Order.

**II. DEFINITIONS**

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

A. **“Assisting Others”** includes:

- 1. performing customer service functions, including receiving or responding to consumer complaints;
- 2. formulating or providing, or arranging for the formulation or provision of, any advertising or marketing material, including any telephone sales script, direct mail solicitation, or the design, text, or use of images of any Internet website, email, or other electronic communication;
- 3. formulating or providing, or arranging for the formulation or provision of, any marketing support material or service, including web or Internet Protocol addresses or domain name registration for any Internet websites, affiliate marketing services, or media placement services;
- 4. providing names of, or assisting in the generation of, potential customers; or
- 5.

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otherwise save a Person's dwelli

1                   iii.       any other disposition of a mortgage, loan, debt,  
2                   or obligation other than a sale to a third party that is not the  
3                   secured, or unsecured student loan, holder.

4       The foregoing shall include any manner of claimed assistance, including  
5       auditing or examining a Person's application for the mortgage, loan, debt,  
6       or obligation.

7               2.       With respect to any loan, debt, or obligation between a  
8       Person and one or more creditors or debt collectors of unsecured student  
9       loans, any Product or Service represented, expressly or by implication, to:

10            a.       repay one or more unsecured student loans, debts, or  
11            obligations; or

12            b.       combine unsecured student loans, debts, or obligations  
13            into one or more new loans, debts, or obligations.

14       C.       "**Person**" means any individual, group, unincorporated  
15       association, limited or general partnership, corporation, or other business entity.

16       D.       "**Product or Service**" means any good or service, including any  
17       plan or program.

18       E.       "**Stipulating Defendants**" means Defendants Arete Financial  
19       Group, also d/b/a Arete Financial Freedom; Arete Financial Group LLC; CBC  
20       Conglomerate LLC, also d/b/a 1file.org; Diamond Choice Inc., also d/b/a  
21       Interest Rate Solutions; J&L Enterprise LLC, also d/b/a Premier Solutions  
22       Servicing; La Casa Bonita Investments, Inc., f/k/a La Casa Bonita Investments  
23       LLC, also d/b/a Education Loan Network, also d/b/a Edunet; and Relief  
24       Defendant MJ Wealth Solutions, LLC, and any other names by which they  
25       might be known, individually, collectively, or in any combination, and their  
26       successors and assigns.

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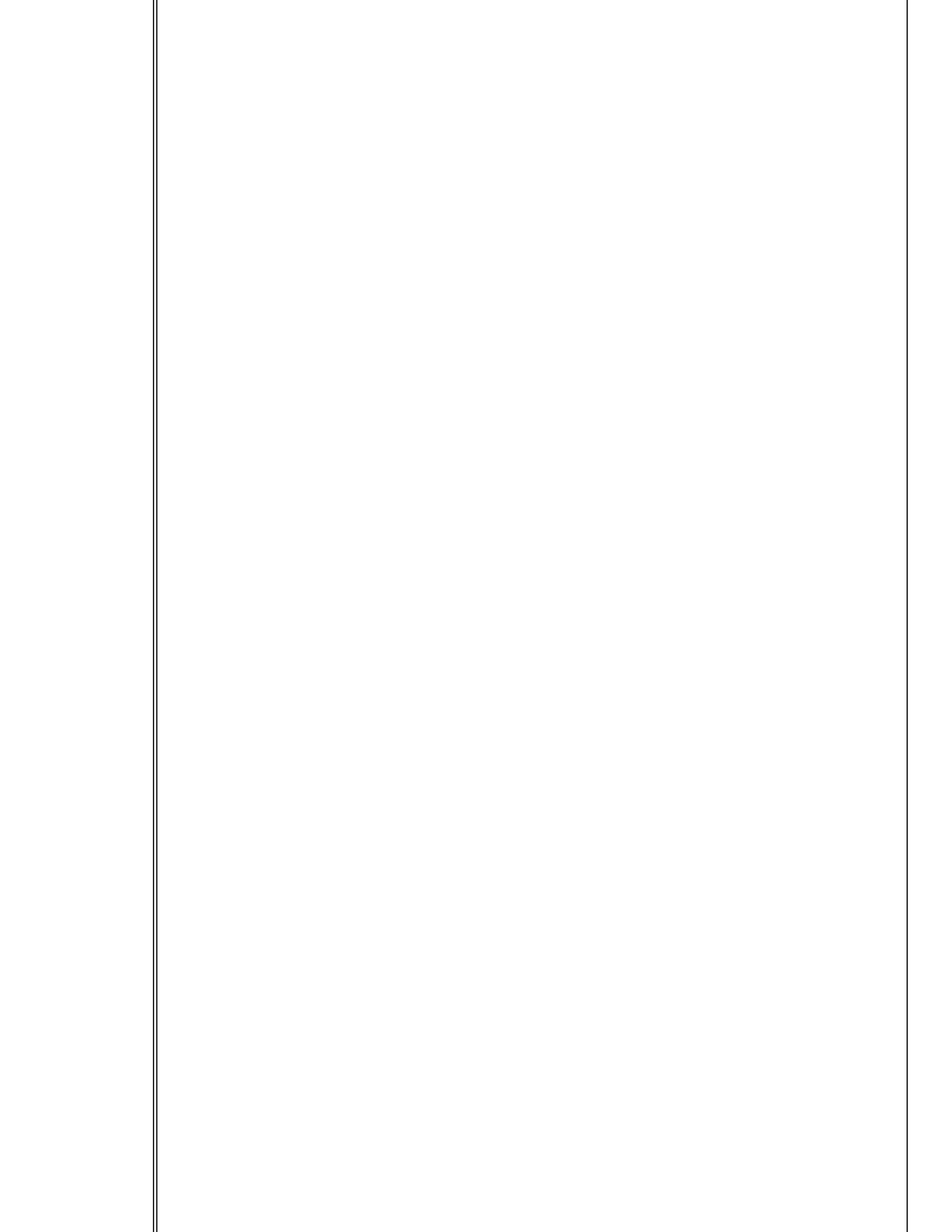
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1 A. Misrepresenting, directly or by implication, in the sale of goods or  
2 services any material aspect of the performance, efficacy, nature, or central  
3 characteristics of goods or services that are the subject of a sales offer; and

4 B. Violating the FTC's Telemarketing Sales Rule, 16 C.F.R. pt. 310, a  
5 copy of which is attached as **Attachment A**.

6 **VII. MONETARY JUDGMENT AND PARTIAL SUSPENSION**

7 **IT IS FURTHER ORDERED** that:

8 A. Judgment in the amount of Twenty-Two Million Seventy-Nine  
9 Thousand Seven Hundred Eighty-Seven Dollars and Thirty Cents  
10 (\$22,079,787.30) is entered in favor of the Commission against Stipulating  
11 Defendants, jointly and severally, as monetary relief.

12 B. In partial satisfaction of the judgment imposed by Subsection A,  
13 Stipulating Defendants shall cooperate fully with the Receiver and take any  
14 other such steps as the Receiver may require to make the payment ordered by  
15 Section X of this Order.

16 C. Upon the payment required by Section X, the remainder of the  
17 judgment imposed by Section VII.A is suspended, subject to Sections VII.D  
18 through VII.F, below.

19 D. The Commission's agreement to the suspension of part of the  
20 judgment is expressly premised upon the truthfulness, accuracy, and  
21 completeness of Stipulating Defendants' sworn financial statements and related  
22 documents (collectively, "Financial Attestations") submitted to the  
23 Commission or attached to this Order, namely:

24 1. the financial statement of Defendant Arete Financial Group,  
25 signed on December 2, 2019;

26 2. the financial statement of Defendant Arete Financial Group  
27 LLC, signed on December 9, 2019;

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3. the financial statement of Defendant CBC Conglomerate LLC, signed on December 4, 2019;
  4. the financial statement of Defendant Diamond Choice Inc., signed on November 21, 2019;
  5. the financial statement of Defendant J&L Enterprise LLC, signed on November 21, 2019;
  6. the financial statement of Defendant La Casa Bonita Investments, Inc., signed on November 21, 2019; and
  7. the financial statement of Relief Defendant MJ Wealth Solutions, LLC, signed on November 21, 2019.
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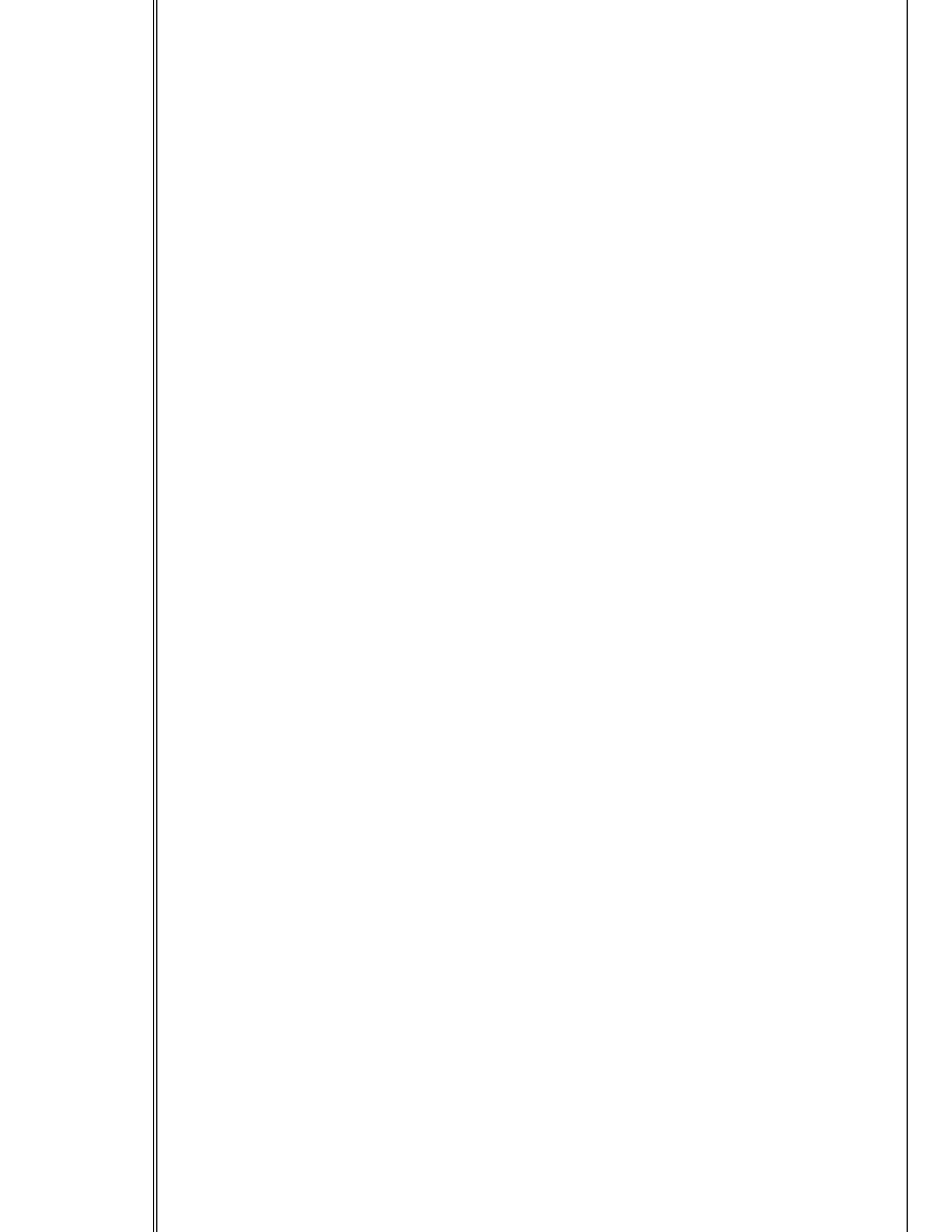
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1           B.     For 15 years after entry of this Order, each Stipulating Defendant  
2 must deliver a copy of this Order to:

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**XV. DISPOSITION OF MOTIONS**

**IT IS FURTHER ORDERED** that, upon entry of this Order, Plaintiff Federal Trade Commission’s Motion for Default Judgment<sup>3</sup> and Defendants Arete Financial Group and Arete Financial Group LLC’s Motion to Set Aside Entry of Default<sup>4</sup> shall be, and hereby are, **DENIED AS MOOT**.

**XVI. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

**IT IS SO ORDERED.**

Dated: March 30, 2022

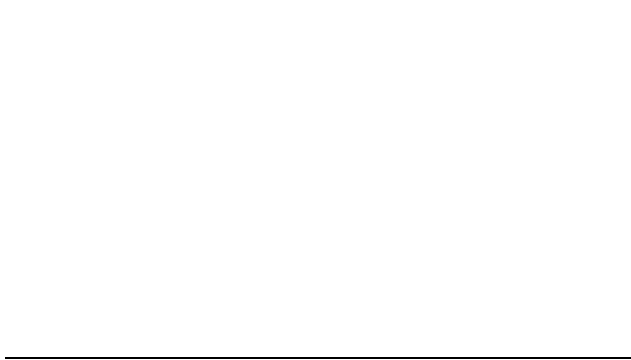


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John W. Holcomb  
UNITED STATES DISTRICT JUDGE

<sup>3</sup> See generally Motion for Default.

<sup>4</sup> Mot. To Set Aside Entry of Default [ECF No. 194].



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1 Honorable John W. Holcomb and entered by the Court on \_\_\_\_\_,  
2 20\_\_.

3 I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct.

5 Executed on \_\_\_\_\_, 20\_\_, at \_\_\_\_\_  
6 [place].

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\_\_\_\_\_   
Individually and as an officer of   
\_\_\_\_\_.

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11 State of \_\_\_\_\_, City of \_\_\_\_\_

12 Subscribed and sworn to before me  
13 this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

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Notary Public

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My commission expires:  
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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**



1           1.     I, \_\_\_\_\_, received a  
2 copy of the Stipulated Order for Permanent Injunction and Monetary Judgment  
3 as to Defendants Arete Financial Group, Arete Financial Group LLC, CBC  
4 Conglomerate LLC, Diamond Choice Inc., J&L Enterprise LLC, La Casa Bonita  
5 Investments, Inc., and Relief Defendant MJ Wealth Solutions, LLC in the case  
6 of *Federal Trade Commission v. American Financial Support Services Inc., et al.*, on  
7 \_\_\_\_\_, 20\_\_\_\_.

8           2.     I was not a Defendant in that court case. My title or relationship  
9 with Defendant(s) \_\_\_\_\_  
10 is: \_\_\_\_\_.

11           I declare under penalty of perjury under the laws of the United States of  
12 America that the foregoing is true and correct.

13           Executed on \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_  
14 [place].

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§ 310.2

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Federal Trade Commission





§ 310.4

16 CFR Ch. I (1-1-21 Edition)

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§ 310.4

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Federal Trade Commission

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R . . . 16 CFR a . . . 436 a . . . l . . . a . . .  
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