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of the Telemarketing and Consumer Fraud and Abuse Prevention Act (the  
 Defendants have waived  
 service of the summons and the Complaint. Now, Plaintiff and Defendants stipulate  
 to the entry of this Stipulated Order for Permanent Injunction, Civil Penalty Judgment,  
 and a civil action between  
 them.

THEREFORE, IT IS ORDERED as follows:

STIPULATED FACTS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants participated in acts or practices in  
 violation of 16 C.F.R. Part 310, amended, 16 C.F.R. Part 310, by (a) placing telemarketing calls to  
 consumers that delivered prerecorded messages; and (b) placing  
 telemarketing calls to consumers whose telephone numbers were on the  
 National Do Not Call Registry.
3. 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,  
 Defendants admit the facts necessary to establish jurisdiction.
4. 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. Defen



3. The Declaration of Robert William Pulsipher Pursuant to 28 U.S.C. § 1746, signed by Robert William Pulsipher on March 16, 2023, including the exhibits.

D. The suspension of the judgment will be lifted as to any Defendant if, upon motion by the Commission or Plaintiff, the Court finds that Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement in (b)(3) (s) 9 (u) rest fsstsinde

in a proceeding to enforce its rights to any payment or monetary judgment pursuant to this Order.

C. Individual Defendant agrees that the judgment represents a civil penalty owed to the government of the United States, is not compensation for actual pecuniary loss, and, therefore, as to Individual Defendant, it is not subject to discharge under the Bankruptcy Code pursuant to 11 U.S.C. § 523(a)(7).

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

#### IV. CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Defendants are permanently restrained and enjoined from directly or indirectly:

A. Disclosing, using, or receiving any benefit from customer or prospective customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that

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credit card, bank account, or other financial account), that any Defendant obtained prior to entry of this Order in connection with telemarketing; and

B. Failing to destroy such customer information in all forms in their possession, custody, or control within 30 days after entry of this Order.

V. COOPERATION

IT IS FURTHER ORDERED that Defendants must fully cooperate with representatives of Plaintiff and the Commission in this case and in any investigation related to or associated with the transactions or the occurrences that are the subject of the Complaint. Defendants must provide truthful and complete information, evidence, and testimony. Individual Defendant must appear, and Corporate Defendant must appear for interviews, discovery, hearings, trials, and any other proceedings that a Plaintiff or Commission representative may reasonably request upon 5 days written notice, or other reasonable notice, at such places and times as a Plaintiff or Commission representative may designate, without the service of a subpoena.

VI. ORDER ACKNOWLEDGMENTS

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

- A. Each 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 5 years after entry of this Order, Individual Defendant for any business that such Defendant, individually or collectively with any other Defendants, is the majority owner or controls directly or indirectly, and Corporate Defendant, 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 Telemarketing and all agents and representatives who





2. Additionally, Individual Defendant must report any change in: (a) name, including aliases or fictitious name, or residence address; or (b) title or role in any business activity, including any business for which such Defendant performs services whether as an employee or otherwise an.79P(i)3 (n)-3 ohtdant

## VIII. RECORDKEEPING



X. RETENTION OF JURISDICTION