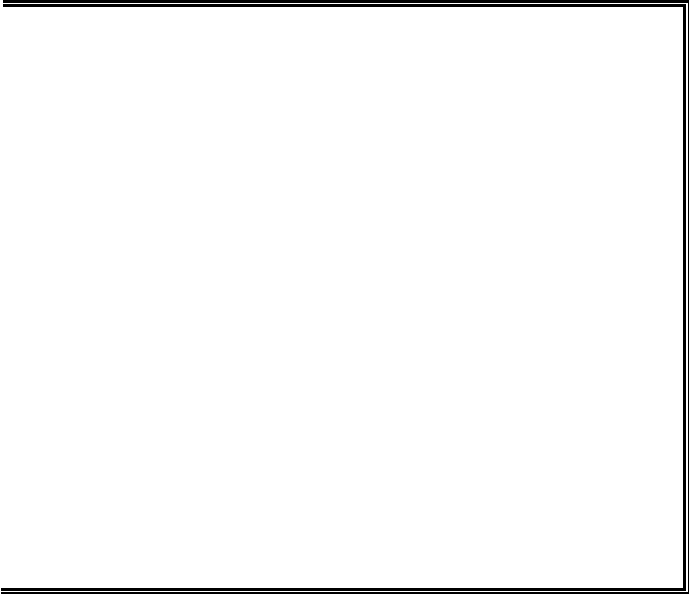


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Federal Trade Commission  
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4



1 entry of this Stipulated Order for Permanent Injunction and Monetary Judgment 3 2 U G H U ' W R  
2 resolve all matters in dispute in this action between them

3 THEREFORE, IT IS ORDERED as follows:

4 FINDINGS

5 1. This Court has jurisdiction over this matter.

6 2. The Complaint charges that Defendants participated in deceptive practices

7 in violation of Section 5 of the FTC Act, 15 U.S.C. § 5, and the COVID-19 Consumer

8 Protection Act, Public Law 112-60, 134 Stat. 1182, Title BT/TT01 of 12 CFR 12.31708.82 (a)

1

1. **Corporate Defendant** 'mead





1 Commission requests in writing any information related to redress, Defendants must provide it,  
2 in the form prescribed by the Commission, within 14 days.

3 **V. ORDER ACKNOWLEDGMENTS**

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

6 A. Each Defendant, within 7 days of entry of this Order, must submit to the  
7 Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

8 B. For 10 years after entry of this Order, each Individual Defendant for any business  
9 that such Defendant, individually or collectively with any other Defendants, is the majority  
10 owner or controls directly or indirectly, and each Corporate Defendant, must deliver a copy of  
11 this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all  
12 employees having managerial responsibilities for conduct related to the subject matter of the  
13 Order and all agents and representatives who participate in conduct related to the subject matter  
14 of the Order; and (3) any business entity resulting from any change in structure as set forth in the  
15 Section titled Compliance Reporting. Delivery must occur within 7 days of entry of this Order  
16 for current personnel. For all others, delivery must occur before they assume their  
17 responsibilities.

18 C. From each individual or entity to which a Defendant delivered a copy of this  
19 Order, that Defendant must obtain, within 30 days, a signed and dated acknowledgment of  
20 receipt of this Order.

21







1 Washington, DC 20580. The subject line must begin: FTC v. Oto Analytics, Inc., FTC Matter  
2 No. 2223021.

3 **VII. RECORDKEEPING**

4 IT IS FURTHER ORDERED that Defendants must create certain records for 10 years  
5 after entry of the Order, unless otherwise specified below, and retain each such record for 5  
6 years. Specifically, Corporate Defendant and the Individual Defendant for any business  
7 advertising, marketing, promoting, distributing, servicing, or offering any financial product or  
8 service that such Defendant, individually or collectively with any other Defendants, is a majority  
9 owner or controls directly or indirectly, must create and retain the following records:

10 A. accounting records showing the revenues from all products or services sold;

11 B. personnel records showing, for each person providing services, whether as an  
12 employee or otherwise, that person's: name; addresses; telephone numbers; job title or position;  
13 dates of service; and (if applicable) the reason for termination;

14 C. records of all consumer complaints and refund requests, whether received directly  
15 or indirectly, such as through a third party, and any response;

16 D. all records necessary to demonstrate full compliance with each provision of this  
17 Order, including all submissions to the Commission;

18 E. a copy of each unique advertisement or other marketing material making a  
19 representation subject to this Order; and

20 F. copies of all subpoenas and other communications with law enforcement, if such  
21 communications relate to Defendants' compliance with this Order.

22  
23  
STIPULATED ORDER



**IX. 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.

**SO ORDERED this 3rd day of April, 2024.**



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UNITED STATES DISTRICT JUDGE

1 **SO STIPULATED AND AGREED:**

2 **FOR PLAINTIFF:**

3 **FEDERAL TRADE COMMISSION**

4

5 \_\_\_\_\_ Date: \_\_\_\_\_

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14 **FOR DEFENDANTS:**

15

16 \_\_\_\_\_ Date: \_\_\_\_\_

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STIPULATED ORDER

