UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

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SAMUEL JAMES SMITH, also d/b/a Weblio, a/k/a Weblio Squeeze,

ROBERT WILLIAM SHAFER, also d/b/a Shafe MM&I, a/k/a MMI,

CHARLES JOSEPH GARIS, JR., individually and as an owner, officer, and/or manager of Business Revolution Group Inc., and also d/b/a Joe Gaines, and

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- G. There is good cause to believe that immediate and irreparable harm will result from Defendan6mith's ongoing violations of the FTC Act and the TSR unless Defer@aith is restrained and enjoined by order of this Court.
- H. There is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief for consumeriscluding monetary restitution, rescission, or refunds will occur from the sale, transfer, destruction, or other disposition or concealment by Defenda mith of his Assets or records, unless Defendant is is strained and enjoined by order of this Court.
 - I. Good cause exists for continuoji to freeze Defenda Stmith's Assets.
 - J. This Order is in the public interest.
- K. This Court has authority to issue this Order pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b; Federal Rule of Civil Procedure 65; and the All Writs Act, 28 U.S.C. § 1651.
- L. The FTC is an independent agency of the United States, and no security is required of any agency of the United States in connection with issuance of a preliminary injunction. Fed. R. Civ. P. 65(c).

<u>DEFINITIONS</u>

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

- A. "Asset means any legal or equitable interest in, right to, or claim to, any property, wherever located and by whomever held.
- B. "Corporate Defendant' means Business Revolution Group Inc., also d/b/a Joe Gaires, and each of its subsidiaries, affiliates, successors, and assigns.

- C. "Defendants' means the Corporate Defendant, Charles Joseph Garis, Jr., also d/b/a Joe Gaines, Samuel James Smith, also d/b/a Weblio, a/k/a Weblio Squeeze, and Robert William Shafer, also d/b/a Shafer MM&I, a/k/a MMI, individually, collectively, or in any combination.
- D. "Document' is synonymous in meaning and equal in scope to the usage of "document" and "electronically stored information" in Federal Rule of Civil Procedure 34(a), Fed. R. Civ. P. 34(a), and includes writings, drawings, graphs, charts, photographs, sound and video recordings, images, Internet sites, web pages, websites, electronic correspondence, including email and instant messages, contracts, accounting data, advertisement Logs, Server Access Logs, books, written or printed records, handwritten notes, telephone logs, telephone scripts, receipt books, ledgers, personal and business canceled checks and check registers, bank statements, appointment books, computer records, customer or sales databases and any other electronically stored information Documents located on remote servers or cloud computing systems, and other data or data compilations from which information can be obtained directly or, if necessariter translation into a reasonably usable form. A draft or non identical copy is a separate document within the meaning of the term.
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2. Any other fact material to consumers concerning any good or service, such as: the total costs; any material restrictions, limitations, or conditions; or

- A. Transferring, liqidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, relinquishing, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing Assetshat are:
 - 1. owned or controlled, directly or indirectly any Defen flr/31p/TT0 1 To,.ont,.ontr13

Section including originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfeased from the accounts, including wire transfers and wire transfer instructions, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and

3.

the name, address, telephone number, email address, and contact person (when applicable) or eachentity or person who (i) supplied, manufactured, formulated, or created each good or service identified in response to Section VI.Cof this Order; (ii) marketed, advertised, sold, or distributed each good or service identified in response to Section VI.C.1 of this Order; (iii) received payment for disseminating or publishing, or assisting in the dissemination or publication, of advertisementatch good or service identified Section VI.C.1 of this Order, including those advertisementalisseminated throughelemarketing; and (iv) paid, directly or indirectly, for each good or service identified in response to Section VI.C.1 of this Order, including the amount paid by the person or entity and the name of the good or service purchased.

VII. FOREIGN ASSET REPATRIATION

IT IS FURTHER ORDERED, to the extent not done in compliance with the Temporary Restraining Order issued in this action on Decer6b2023 ECFNo. 6), that within three(3) days following the service of this Order Defendantith shall

A. ProvidePlaintiff's counsel with a full accounting, verified under oath and accurate as of the date of this Order, of all Assems uments, and accounts outside of the United States which are: (1) titled in the name, individually or jointly, of Defendant Smith; (2) held by any person or entity for the benefit of Defendant for the benefit of any

B. Take all steps necessary troopide Plaintiff's counsel access to allocuments and records that may be held by third parties located outside of the territorial United States of

B. Notifying any trustee, protector or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a court orderuntil such time that Defenda8tmith's Assets have been fully repatriated pursuant to this Order.

IX. CONSUMER CREDIT REPORTS

IT IS FURTHER ORDERED that Plaintiff may obtain credit reports concerning

DefendantSmithpursuant to Section 604(a) of the Fair Credit Reporting Act, 15 U.S.C.

1681b(a)(1), and that, upon written request, any credit reporting agency from which such reports are requested shall provide them to Plaintiff.

X. PRESERVATION OF RECORDS

IT IS FURTHER ORDERED that Defendan6mith, hisagents, 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 restrained and enjoined from:

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A.

XV. CORRESPONDENCE AND SERVICE ON PLAINTIFF
IT IS FURTHER ORDERED 3 (Tw 4.17 0 Td ([(th-2.3a1 -2t th-2.3is1 -2 O8.81(d)7 ((t)- d4 (s1
