

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	Civil Action No.
)	
v.)	STIPULATED FINAL JUDGMENT
)	AND ORDER FOR PERMANENT
SAN JUAN IPA, INC.)	INJUNCTION AND CIVIL PENALTY
)	
Defendant.)	
)	

Plaintiff, the Federal Trade Commission (“Commission”) filed its Complaint for Civil Penalties and Other Relief (“Complaint”) for permanent injunction, civil penalties, and other relief in this matter, pursuant to Sections 5 and 16(a)(1) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45 and 56(a)(1). Defendant has waived service of the summons and Complaint. Plaintiff and Defendant stipulated to entry of this Stipulated Final Judgment and Order for Permanent Injunction and Civil Penalty (“Stipulated Order”) to resolve all claims for civil penalties and injunctive relief known by the Commission prior to entry of this Stipulated Order.

THEREFORE, IT IS HEREBY ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendant engaged in conduct that violated the Decision and Order issued by the Commission in a proceeding bearing Docket No. C-4142 (“FTC Order”) set forth in Attachment A.

III. RECORD RETENTION

IT IS FURTHER ORDERED that for a period of 5 years, Defendant shall retain copies of all written communications with any Payor or third party and all internal memoranda and reports relating to the negotiation of any contract with a Payor. Defendant shall provide copies of such documents to FTC staff upon request.

IV. ORDER NOTIFICATION AND DISTRIBUTION

SO STIPULATED AND AGREED:

FOR FEDERAL TRADE COMMISSION:

**HOLLY
VEDOVA**

Digitally signed by HOLLY
VEDOVA
Date: 2022.09.28 18:28:00
-04'00'

Holly L. Vedova
Director
Bureau of Competition

**MARIBETH
PETRIZZI**

Digitally signed by
MARIBETH PETRIZZI
Date: 2022.09.28 13:38:42
-04'00'

Maribeth Petrizzi (D.C. Bar #435204)
Assistant Director
Bureau of Competition

**ERIC
ROHLCK**

Digitally signed by ERIC
ROHLCK
Date: 2022.09.28
13 58:51 -04'00'

Eric D. Rohlck (D.C. Bar #419660)
Deputy Assistant Director
Bureau of Competition

**JEFFERY
DAHNIKE**

Digitally signed by JEFFERY
DAHNIKE
Date: 2022.09.29 09:01:09
-04'00'

Jeffery Dahnke
Sebastian A. Lorigo
Kenneth A. Libby
Attorneys
Federal Trade Commission

FOR DEED


San Juan IPA

By: Daniel
President


Gerald A. Stein (D.C.)

1301 Avenue of the Americas
NEW YORK, NY 10019

Email:

Counsel for San Juan IPA, Inc.

Attachment A
[FTC Order]

Attachment B

[San Juan IPA letterhead]

[Name of Payor]

Dear [name of Payor]:

San Juan IPA is required to send you this notice by the Stipulated Final Judgment and Order (“Stipulated Order”) entered in *Federal Trade Commission v. San Juan IPA*, Civil Action No. xxxxxx. In this matter, the Federal Trade Commission (“FTC”) alleged that San Juan IPA violated the FTC’s Decision and Order issued on June 30, 2005 (FTC Docket No. C-4142).

The Stipulated Order reflects a settlement without litigation between the FTC and San Juan IPA

Attachment C

[San Juan IPA letterhead]

[Name of Payor]

Dear [name of Payor]: