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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

	) Case no. SACV14-01033 JLS
	) (RNBx)
FEDERAL TRADE COMMISSION,	)
Plaintiff,	) <b>STIPULATED ORDER FOR</b>
	) <b>PERMANENT INJUNCTION</b>
v.	) <b>AND MONETARY</b>
	) <b>JUDGMENT AS TO</b>
CD CAPITAL INVESTMENTS, LLC, <i>et al.</i> )	) <b>DEFENDANT GABRIEL</b>
Defendant.	) <b>DREWS STEWART</b>
	) Judge: Hon. Josephine L. Staton
	)

Plaintiff, Federal Trade Commission (“Commission”) filed its Complaint, as amended (“Complaint”), for permanent injunction and other equitable relief in this matter, pursuant to Section 13(b) and 19 of the FTC Act (“FTC Act”), 15 U.S.C. §§ 53b and 57b.

The Commission and Defendant Gabriel Drews Stewart have stipulated to entry of this Stipulated Order for Permanent Injunction and Monetary Judgment as to Defendant Gabriel Drews Stewart (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

**FINDINGS**

1  
2 1. This Court has jurisdiction over this matter.

3 2. The Complaint charges that the Stipulating Defendant participated in  
4 deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. §  
5 45, the Mortgage Assistance Relief Services Rule (“MARS Rule”), 16 C.F.R. Part  
6 322, re-codified as Mortgage Assistance Relief Services (“Regulation O”), 12  
7 C.F.R. Part 1015, in connection with the marketing and sale of mortgage loan  
8 modification and foreclosure relief services.

9 3. The Stipulating Defendant neither admits nor denies any of the  
10 allegations of the Complaint, excepted as specifically stated in this Order. Only for  
11 purposes of this action, the Stipulating Defendant admits the facts necessary to  
12 establish jurisdiction.

13 4. The Stipulating Defendant waives any claim that he may have under  
14 the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of  
15 this action through the date of this Order, and agrees to bear his own costs and  
16 attorney fees.

17 5. The Stipulating Defendant and the Commission waive all rights to  
18 appeal or otherwise challenge or contest the validity of this Order.

19 6. Entry of this Order is in the public interest.

20 **DEFINITIONS**

21 For purposes of this Order, the following definitions apply:

22 A. **“Assisting others” includes:**

- 23 1. performing customer service functions, including receiving or  
24 responding to consumer complaints;  
25 2. formulating or providing, or arranging for the formulation or  
26 provision of, any advertising or marketing material, including  
27 any telephone sales script, direct mail solicitation, or the design,  
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- 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;
- 5. performing marketing, billing, or payment services of any kind; or
- 6. acting or serving as an owner, officer, director, manager, or principal of any entity.

B. **“Financial product or service”** means any product, service, plan, or program represented, expressly or by implication, to:

- 1. provide any consumer, arrange for any consumer to receive, or assist any consumer in receiving, a loan or other extension of credit;
- 2. provide any consumer, arrange for any consumer to receive, or assist any consumer in receiving, credit, debit, or stored value cards;
- 3. improve, repair, or arrange to improve or repair, any consumer’s credit record, credit history, or credit rating; or
- 4. provide advice or assistance to improve any consumer’s credit record, credit history, or credit rating.

C. **“Judgment Defendants”** means Tuan D. Duong, Christian D. Quezada, CD Capital Investments, LLC, CD Capital, LLC, and GDS Information Services, Inc., each of whom is identified in and subject

1 to the Court’s Permanent Injunction and Order for Equitable Relief in  
2 this action dated August 22, 2016 (Docket No. 172).

3 D. **“Person”** means a natural person, organization, or other legal entity,  
4 including a corporation, limited liability company, partnership,  
5 proprietorship, association, cooperative, or any other group or  
6 combination acting as an entity.

7 E. **“Secured or unsecured debt relief product or service”** means:

8 1. With respect to any mortgage, loan, debt, or obligation between  
9 a person and one or more secured or unsecured creditors or debt  
10 collectors, any product, service, plan, or program represented,  
11 expressly or by implication, to:

12 a. stop, prevent, or postpone any mortgage or deed of  
13 foreclosure sale for a person’s dwelling, any other sale of  
14 collateral, any repossession of a person’s dwelling or  
15 other collateral, or otherwise save a person’s dwelling or  
16 other collateral from foreclosure or repossession;

17 b. negotiate, obtain, or arrange a modification, or  
18 renegotiate, settle, or in any way alter any terms of the  
19 mortgage, loan, debt, or obligation, including a reduction  
20 in the amount of interest, principal balance, monthly  
21 payments, or fees owed by a person to a secured or  
22 unsecured creditor or debt collector;

23 c. obtain any forbearance or modification in the timing of  
24 payments from any secured or unsecured holder or  
25 servicer of any mortgage, loan, debt, or obligation;

26 d. negotiate, obtain, or arrange any extension of the period  
27 of time within which a person may (i) cure his or her  
28 default on the mortgage, loan, debt, or obligation, (ii)

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- reinstate his or her mortgage, loan, debt, or obligation,
- (iii) redeem a dwelling or other collateral, or (iv) exercise any right to reinstate the mortgage, loan, debt, or obligation or redeem a dwelling or other collateral;
- e. obtain any waiver of an acceleration clause or balloon payment contained in any promissory note or contract secured by any dwelling or other collateral; or
- f. negotiate, obtain, or arrange (i) a short sale of a dwelling or other collateral, (ii) a deed-in-lieu of foreclosure, or (iii) any other disposition of a mortgage, loan, debt, or obligation other than a sale to a third party that is not the secured or unsecured loan holder.

The foregoing shall include any manner of claimed assistance, including auditing or examining a person’s application for the mortgage, loan, debt, or obligation.

- 2. With respect to any loan, debt, or obligation between a person and one or more unsecured creditors or debt collectors, any product, service, plan, or program represented, expressly or by implication, to:
  - a. repay one or more unsecured loans, debts, or obligations;
  - or
  - b. combine unsecured loans, debts, or obligations into one or more new loans, debts, or obligations.

F. **“Stipulating Defendant”** means Gabriel Drews Stewart, by this name, and any other names by which he might be known.

1 **ORDER**

2 **I. BAN ON SECURED AND UNSECURED DEBT**  
3 **RELIEF PRODUCTS AND SERVICES**

4 **IT IS ORDERED** that the Stipulating Defendant is permanently  
5 restrained and enjoined from advertising, marketing, promoting, offering for  
6 sale, or selling or assisting others in the advertising, marketing, promoting,  
7 offering for sale, or selling, any secured or unsecured debt relief product or  
8 service.

9 Provided, that if the Stipulating Defendant holds a license in good  
10 standing from the appropriate licensing agency, or is employed by a broker that  
11 holds a license in good standing from the appropriate agency, Section I shall not  
12 prohibit the Stipulating Defendant from doing or negotiating to do one or more  
13 of the following acts for another, unless such act is marketed as a way to save a  
14 person's home from foreclosure or repossession: selling or offering to sell,  
15 buying or offering to buy, soliciting prospective sellers or purchasers of,  
16 soliciting or obtaining listings of, or negotiating the purchase, sale or exchange  
17 of real property in a purchase money real estate transaction; or arranging or  
18 negotiating to arrange a purchase money mortgage or the refinancing of a  
19 mortgage. This proviso shall not be construed to limit the licensing or  
20 regulatory powers of any federal, state, or local government agency or other  
21 entity regulating real estate agents.

22 **II. PROHIBITION AGAINST MISREPRESENTATIONS RELATING**  
23 **TO FINANCIAL PRODUCTS AND SERVICES**

24 **IT IS FURTHER ORDERED** that the Stipulating Defendant, his  
25 officers, agents, employees, and attorneys, and all other persons in active  
26 concert or participation with him, who receive actual notice of this Order,  
27 whether acting directly or indirectly, in connection with the advertising,  
28 marketing, promoting, offering for sale or selling of any financial product or

1 service, are permanently restrained and enjoined from misrepresenting or  
2 assisting others in misrepresenting, expressly or by implication:

3 A. the terms or rates that are available for any loan or other extension of  
4 credit, including:

- 5 1. closing costs or other fees;
- 6 2. the payment schedule, monthly payment amount(s), any balloon  
7 payment, or other payment terms;
- 8 3. the interest rate(s), annual percentage rate(s), or finance  
9 charge(s), and whether they are fixed or adjustable;
- 10 4. the loan amount, credit amount, draw amount, or outstanding  
11 balance; the loan term, draw period, or maturity; or any other  
12 term of credit;
- 13 5. the amount of cash to be disbursed to the borrower out of the  
14 proceeds, or the amount of cash to be disbursed on behalf of the  
15 borrower to any third parties;
- 16 6. whether any specified minimum payment amount covers both  
17 interest and principal, and whether the credit has or can result in  
18 negative amortization; or
- 19 7. that the credit does not have a prepayment penalty or whether  
20 subsequent refinancing may trigger a prepayment penalty  
21 and/or other fees;

22 B. the ability to improve or otherwise affect a consumer's credit record,  
23 credit history, credit rating, or ability to obtain credit, including that a  
24 consumer's credit record, credit history, credit rating, or ability to  
25 obtain credit can be improved by permanently removing current,  
26 accurate negative information from the consumer's credit record or  
27 history;

28 C. that a consumer will receive legal representation; or

1 D. any other fact material to consumers concerning any good or service,  
2 such as: the total costs; any material restrictions, limitations, or  
3 conditions; or any material aspect of its performance, efficacy, nature,  
4 or central characteristics.

5 **III. PROHIBITION AGAINST MISREPRESENTATIONS RELATING**  
6 **TO ANY PRODUCTS OR SERVICES**

7 **IT IS FURTHER ORDERED** that the Stipulating Defendant and his  
8 officers, agents, employees, and attorneys, and all other persons in active  
9 concert or participation with him, who receive actual notice of this Order,  
10 whether acting directly or indirectly, in connection with the advertising,  
11 marketing, promoting, offering for sale, or selling of any product, service,  
12 plan, or program, are permanently restrained and enjoined from  
13 misrepresenting, or assisting others in misrepresenting, expressly or by  
14 implication:

- 15 A. any material aspect of the nature or terms of any refund, cancellation,  
16 exchange, or repurchase policy, including the likelihood of a  
17 consumer obtaining a full or partial refund, or the circumstances in  
18 which a full or partial refund will be granted to the consumer;
- 19 B. that any person is affiliated with, endorsed or approved by, or  
20 otherwise connected to any other person; government entity; public,  
21 non-profit, or other non-commercial program; or any other program;
- 22 C. the nature, expertise, position, or job title of any person who provides  
23 any product, service, plan, or program; or
- 24 D. any other fact material to consumers concerning any good or service,  
25 such as: the total costs; any material restrictions, limitations, or  
26 conditions; or any material aspect of its performance, efficacy, nature,  
27 or central characteristics.
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1 **IV.**

2 **MONETARY JUDGMENT AND PARTIAL SUSPENSION**

3 **IT IS FURTHER ORDERED** that:

- 4 A. Judgment in the amount of one million seven hundred eighty four  
5 thousand eight hundred sixty four dollars (\$1,784,864) is entered in  
6 favor of the Commission and against the Stipulating Defendant,  
7 jointly and severally with the Judgment Defendants, as equitable  
8 monetary relief.
- 9 B. The Stipulating Defendant is ordered to pay the Commission one  
10 hundred five thousand four hundred eighty seven dollars (\$105,487).  
11 The remainder of the judgment is suspended as to the Stipulating  
12 Defendant, subject to the Subsections below.
- 13 C. The Commission's agreement to the suspension of part of the  
14 judgment is expressly premised upon the truthfulness, accuracy, and  
15 completeness of Defendants' sworn financial statements and related  
16 documents (collectively, "financial representations" ) submitted to the  
17 Commission, namely the Financial Statement of Individual Defendant  
18 Gabriel Drews Stewart signed on September 22, 2016, including the  
19 attachments.
- 20 D. The suspension of the judgment will be lifted as to the Stipulating  
21 Defendant if, upon motion by the Commission, the Court finds that  
22 the Stipulating Defendant failed to disclose any material asset,  
23 materially misstated the value of any asset, or made any other material  
24 misstatement or omission in the financial representations identified  
25 above.
- 26 E. If the suspension of the judgment is lifted, the judgment becomes  
27 immediately due as to the Stipulating Defendant in the amount  
28 specified in Subsection A above (which the parties stipulate only for

1 purposes of this Section represents the consumer injury alleged in the  
2 Complaint), less any payment previously made pursuant to this  
3 Section, plus interest computed from the date of entry of this Order.

4 F. Upon Defendant's full payment of the amount set forth in  
5 Subparagraph B, he may request that the FTC file a notice of receipt  
6 of payment with the Court. In response, the FTC shall file such a  
7 notice within a reasonable time.

8 **V.**

9 **ADDITIONAL MONETARY PROVISIONS**

10 **IT IS FURTHER ORDERED** that:

- 11 A. The Stipulating Defendant relinquishes dominion and all legal and  
12 equitable right, title, and interest in all assets transferred pursuant to  
13 this Order and may not seek the return of any assets.
- 14 B. The facts alleged in the Complaint will be taken as true, without  
15 further proof, in any subsequent civil litigation by or on behalf of the  
16 Commission, including in a proceeding to enforce its rights to any  
17 payment or monetary judgment pursuant to this Order, such as a  
18 nondischargeability complaint in any bankruptcy case.
- 19 C. The facts alleged in the Complaint establish all elements necessary to  
20 sustain an action by the Commission pursuant to Section 523(a)(2)(A)  
21 of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order will  
22 have collateral estoppel effect for such purposes.
- 23 D. The Stipulating Defendant acknowledges that his Taxpayer  
24 Identification Numbers (Social Security Numbers or Employer  
25 Identification Numbers), which the Stipulating Defendant must submit  
26 to the Commission, may be used for collecting and reporting on any  
27 delinquent amount arising out of this Order, in accordance with 31  
28 U.S.C. §7701.

1 E. All money paid to the Commission pursuant to this Order may be  
2 deposited into a fund administered by the Commission or its designee  
3 to be used for equitable relief, including consumer redress and any  
4 attendant expenses for the administration of any redress fund. If a  
5 representative of the Commission decides that direct redress to  
6 consumers is wholly or partially impracticable or money remains after  
7 redress is completed, the Commission may apply any remaining  
8 money for such other equitable relief (including consumer information  
9 remedies) as it determines to be reasonably related to the Stipulating  
10 Defendant's practices alleged in the Complaint. Any money not used  
11 for such equitable relief is to be deposited to the U.S. Treasury as  
12 disgorgement. The Stipulating Defendant has no right to challenge  
13 any actions the Commission or its representatives may take pursuant  
14 to this Subsection.

15 **VI.**

16 **CUSTOMER INFORMATION**

17 **IT IS FURTHER ORDERED** that the Stipulating Defendant, his officers,  
18 agents, employees, and attorneys, and all other persons in active concert or  
19 participation with him, who receive actual notice of this Order, whether acting  
20 directly or indirectly, are permanently restrained and enjoined from directly or  
21 indirectly:

- 22 A. Failing to provide sufficient customer information to enable the  
23 Commission to efficiently administer consumer redress. If a  
24 representative of the Commission requests in writing any information  
25 related to redress, the Stipulating Defendant must provide it, in the  
26 form prescribed by the Commission, within 14 days.
- 27 B. Disclosing, using, or benefitting from customer information, including  
28 the name, address, telephone number, email address, social security

1 number, other identifying information, or any data that enables access  
2 to a customer's account (including a credit card, bank account, or  
3 other financial account), that any Defendant obtained prior to entry of  
4 this Order in connection with the marketing of any financial product  
5 or service.

6 C. Failing to destroy such customer information in all forms in their  
7 possession, custody, or control within 30 days after entry of this Order  
8 Provided, however, that customer information need not be disposed of, and  
9 may be disclosed, to the extent requested by a government agency or  
10 required by law, regulation, or court order.

11 **VII.**

12 **COOPERATION**

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

22 **VIII.**

23 **ORDER ACKNOWLEDGMENTS**

24 **IT IS FURTHER ORDERED** that the Stipulating Defendant obtain  
25 acknowledgments of receipt of this Order:

26 A. The Stipulating Defendant, within 7 days of entry of this Order, must  
27 submit to the Commission an acknowledgment of receipt of this Order  
28 sworn under penalty of perjury.

- 1 B. For 5 years, after entry of this Order, the Stipulating Defendant, for  
2 any business that he, individually or collectively with any other  
3 Defendant, is the majority owner or controls directly or indirectly,  
4 must deliver a copy of this Order to: (1) all principals, officers,  
5 directors, and LLC managers and members; (2) all employees, agents,  
6 and representatives who participate in conduct related to the  
7 marketing of any financial product or service; and (3) any business  
8 entity resulting from any change in structure as set forth in the Section  
9 titled Compliance Reporting. Delivery must occur within 7 days of  
10 entry of this Order for current personnel. For all others, delivery must  
11 occur before they assume their responsibilities.
- 12 C. From each individual or entity to which a Defendant delivered a copy  
13 of this Order, the Stipulating Defendant must obtain, within 30 days, a  
14 signed and dated acknowledgment of receipt of this Order.

15 **IX.**

16 **COMPLIANCE REPORTING**

17 **IT IS FURTHER ORDERED** that the Stipulating Defendant make timely  
18 submissions to the Commission:

- 19 A. One year after entry of this Order, the Stipulating Defendant must  
20 submit a compliance report, sworn under penalty of perjury that:
- 21 1. identifies all telephone numbers and all physical, postal, email  
22 and Internet addresses, including all residences;
  - 23 2. identifies all business activities, including any business for  
24 which the Stipulating Defendant performs services whether as  
25 an employee or otherwise and any entity in which the  
26 Stipulating Defendant has any ownership interest;
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- 1           3.     describes in detail the Stipulating Defendant's involvement in
- 2                 each such business, including title, role, responsibilities,
- 3                 participation, authority, control, and any ownership;
- 4           4.     identifies the primary physical, postal, and email address and
- 5                 telephone number, as designated points of contact, which
- 6                 representatives of the Commission may use to communicate
- 7                 with the Stipulating Defendant;
- 8           5.     identifies all of the Stipulating Defendant's businesses by all of
- 9                 their names, telephone numbers, and physical, postal, email,
- 10                and Internet addresses;
- 11           6.     describes the activities of each business, including the goods
- 12                 and services offered, the means of advertising, marketing, and
- 13                 sales, and the involvement of any other Defendant (which the
- 14                 Stipulating Defendant must describe if he knows or should
- 15                 know due to his own involvement);
- 16           7.     describes in detail whether and how that the Stipulating
- 17                 Defendant is in compliance with each Section of this Order; and
- 18           8.     provides a copy of each Order Acknowledgment obtained
- 19                 pursuant to this Order, unless previously submitted to the
- 20                 Commission.

21        B.     For 20 years, after entry of this Order, the Stipulating Defendant must  
22               submit a compliance notice, sworn under penalty of perjury, within 14  
23               days of any change in the following:

- 24           1.     any designated point of contact;
- 25           2.     the structure of any entity that the Stipulating Defendant has
- 26                 any ownership interest in or controls directly or indirectly that
- 27                 may affect compliance obligations arising under this Order,
- 28                 including: creation, merger, sale, or dissolution of the entity or

1 any subsidiary, parent, or affiliate that engages in any acts or  
2 practices subject to this Order.

3 3. his name, including aliases or fictitious name, or residence  
4 address; or

5 4. his title or role in any business activity, including any business  
6 for which the Stipulating Defendant performs services whether  
7 as an employee or otherwise and any entity in which the  
8 Stipulating Defendant has any ownership interest, and identify  
9 the name, physical address, and any Internet address of the  
10 business or entity.

11 C. The Stipulating Defendant must submit to the Commission notice of  
12 the filing of any bankruptcy petition, insolvency proceeding, or  
13 similar proceeding by or against the Stipulating Defendant within 14  
14 days of its filing.

15 D. Any submission to the Commission required by this Order to be  
16 sworn under penalty of perjury must be true and accurate and comply  
17 with 28 U.S.C. § 1746, such as by concluding: “I declare under  
18 penalty of perjury under the laws of the United States of America that  
19 the foregoing is true and correct. Executed on: \_\_\_\_\_” and supplying  
20 the date, signatory’s full name, title (if applicable), and signature.

21 E. Unless otherwise directed by a Commission representative in writing,  
22 all submissions to the Commission pursuant to this Order must be  
23 emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S.  
24 Postal Service) to: Associate Director for Enforcement, Bureau of  
25 Consumer Protection, Federal Trade Commission, 600 Pennsylvania  
26 Avenue NW, Washington, DC 20580. The subject line must begin:  
27 FTC v. CD Capital Investments, LLC, X140035.  
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**X.**

**RECORDKEEPING**

**IT IS FURTHER ORDERED** that the Stipulating Defendant must create certain records for 20 years after entry of the Order, and retain each such record for 5 years. Specifically, the Stipulating Defendant, for any business that he, individually or collectively with any other Defendants, is a majority owner or controls directly or indirectly, must create and retain the following records:

- A. accounting records showing the revenues from all goods or services sold;
- B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response, concerning the subject matter of the Order;
- D. all records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission; and
- E. a copy of each advertisement or other marketing material related to the marketing and telemarketing of any good or service, or the acquisition or sale of marketing leads for any good or service.

**XI.**

**COMPLIANCE MONITORING**

**IT IS FURTHER ORDERED** that, for the purpose of monitoring compliance with this Order, including the financial representations upon which part of the judgment was suspended and any failure to transfer any assets as required by this Order:



- 1           A.    Within 14 days of receipt of a written request from a representative of  
2           the Commission, the Stipulating Defendant must: submit additional  
3           compliance reports or other requested information, which must be  
4           sworn under penalty of perjury; appear for depositions; and produce  
5           documents for inspection and copying. The Commission also is  
6           authorized to obtain discovery, without further leave of court, using  
7           any of the procedures prescribed by Federal Rules of Civil Procedure  
8           29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.
- 9           B.    For matters concerning this Order, the Commission is authorized to  
10          communicate directly with the Stipulating Defendant. The Stipulating  
11          Defendant must permit representatives of the Commission to  
12          interview any employee or other person affiliated with the Stipulating  
13          Defendant who has agreed to such an interview. The person  
14          interviewed may have counsel present.
- 15          C.    The Commission may use all other lawful means, including posing,  
16          through its representatives as consumers, suppliers, or other  
17          individuals or entities, to the Stipulating Defendant or any individual  
18          or entity affiliated with the Stipulating Defendant, without the  
19          necessity of identification or prior notice. Nothing in this Order limits  
20          the Commission's lawful use of compulsory process, pursuant to  
21          Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.
- 22          D.    Upon written request from a representative of the Commission, any  
23          consumer reporting agency must furnish consumer reports concerning  
24          the Stipulating Defendant, pursuant to Section 604(1) of the Fair  
25          Credit Reporting Act, 15 U.S.C. §1681b(a)(1).
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**XII.**

**RETENTION OF JURISDICTION**

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

**IT IS SO ORDERED** this 21st day of February.



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United States District Judge