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20 UNITED STATES DISTRICT COURT
21 CENTRAL DISTRICT OF CALIFORNIA

22 FEDERAL TRADE COMMISSION,
23 Plaintiff,
24 vs.

25 IMPETUS ENTERPRISE, INC., a
26 California corporation, also d/b/a Aiding
27 Student Relief, Aiding Students &
28 Teachers, Aidnest, Avec Staffing, and
National Education Student and Teacher;
FIG TREE & CO., LLC, a California
limited liability company, also d/b/a
Aiding Student Relief, Aiding Students
& Teacher, and Aiding Students &
Teachers; TUAN DINH DUONG, a/k/a
Thomas Duong, a/k/a Thomas Dinh,
individually and as an officer of
IMPETUS ENTERPRISE, INC.;
BRENDA AVITIA-PENA, individually
and as an officer of IMPETUS
ENTERPRISE, INC. and FIG TREE &
CO., LLC; and BRIAN COLOMBANA
d/b/a FUTERO, individually and as an
officer of FIG TREE & CO., LLC,

Defendants,

NOEL SOLUTIONS, LLC, a Wyoming
limited liability company,

Relief Defendant.

Case No. 8:18-cv-01987-JLS-KES

**RECEIVER'S SECOND INTERIM
REPORT**

Ctrm: 10A
Judge: Hon. Josephine L. Staton

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1 On November 13, 2018, this Court entered the Ex Parte Temporary
2 Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and
3 Other Equitable Relief, and Order to Show Cause Why Preliminary Injunction
4 Should Not Issue (the "TRO"), appointing Krista L. Freitag ("Receiver") temporary
5 receiver for Impetus Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig
6 Tree"), each of their subsidiaries, affiliates, successors and assigns, and any other
7 entity that has conducted any business related to Defendants' student debt relief
8 enterprise, including receipt of Assets derived from any activity that is the subject of
9 the Complaint in this matter, and that the Receiver determines is controlled or
10 owned by any Defendant (collectively the "Receivership Entities" or individually, a
11 "Receivership Entity") with full powers of an equity receiver. Dkt. No. 23. On
12 November 29, 2018, this Court entered the associated Preliminary Injunction with
13 Asset Freeze, Appointment of Receiver and Other Equitable Relief order "the PI
14 Order" appointing Receiver as permanent receiver for the Receivership Entities,
15 including but not limited to Capital Sun Investments, LLC (d/b/a Studora) or
16 Premier Capital Investments, LLC, and Jimmy Calderon (when conducting activities
17 in relation to any of the foregoing entities). Dkt. No. 38.

18 The Receiver's bond was filed with the Court on December 6, 2018. Dkt.
19 No. 40. Pursuant to the Court's direction during the hearing held on November 27,
20 2018, the following report serves as an update regarding the Receiver's work
21 performed thus far pursuant to the TRO and PI Order, as well as her early
22 observations.

23 I. EXECUTIVE SUMMARY UPDATE

24 Effective Thursday, November 14, 2018, the Receiver successfully obtained
25 possession of and secured the following physical location included in the TRO and
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1 associated with the operations of Impetus, Fig Tree and Capital Sun Investments,
2 LLC, a Wyoming Limited Liability Corporation¹:

- 3 • 1651 E. 4th Street, Santa Ana, CA 92701 (including the 2522
4 Chambers Rd., 11th Floor, Tustin, CA 92626 and 18100 Von Karman
5 Ave., Suite 850, Irvine, CA 92612 virtual office locations, where it
6 appears mail was directed and received).

7 Numerous documents and records (including electronic forms thereof) were
8 initially secured therein and/or were otherwise secured. Such physical records have
9 now been moved to secure storage, and the 1651 E. 4th Street suite has been emptied
10 and turned over to the landlord.

11 Through review of banking records, one other physical (and vacated)
12 operating location was identified in Irvine, and numerous additional virtual office
13 addresses and active operations of defendant Impetus (d/b/a Avec Staffing) and
14 affiliated entities, IDR Education and Synergy Student Services, were identified.
15 Change of address forms and notices of the TRO have been processed as such
16 locations have been discovered. Numerous banking records also suggest a physical
17 operation existed in Colombia.

18 Bank accounts and payment processors previously identified by the Federal
19 Trade Commission ("Commission") and additional accounts and payment
20 processors identified through an investigation of documents and information found
21 at the physical and virtual office locations where the Receivership Entities
22 conducted business as well as through additional investigation have been directed to
23 be frozen. A detailed summary of the recovery of assets to date is presented below;
24 however, given the government shutdown and furlough impact on the Commission,
25 the complete results of the instant asset freeze are not yet fully known as certain

26

27

28 ¹ Capital Sun Investments, LLC, d/b/a Studora, was operating in the 1651 E. 4th
Street, Santa Ana, CA 92701 location, and was determined to be to an affiliate
and/or successor operator of Defendants' student debt relief business.

1 institutional responses have yet to be received. Certain financial institutions respond
2 directly to the Commission's asset freeze; the Receiver then gains access to such
3 documentation through the Commission.

4 Based on the Receiver's investigation of documents and computer records, the
5 Receiver has identified and recovered approximately \$329,000, which includes bank
6 account balances and payment processor reserve balances. At this point, the
7 Receiver is not aware of any other material funds or assets of the Receivership
8 Entities. No real property owned by the Receivership Entities has yet been
9 identified and the Receiver is still awaiting other account information.

10 The Receiver has not yet identified the entire scope of the Receivership
11 Entities' enterprise, the consumers or the specific amounts invested and expended.
12 However, through service of the TRO and PI Order on the customer relationship
13 management ("CRM") software companies (four separate companies
14 identified/served), the Receiver has been able to freeze and gain administrative
15 control over the CRM databases for the following:

- 16 1. Capital Sun Investments, LLC d/b/a Studora – affiliated with
17 Receivership Entities as further discussed below
- 18 2. Avec Staffing (aka People's Choice) – associated with Defendant
19 Brenda Avitia-Pena
- 20 3. IDR Education (and what appears to be an additional d/b/a of Synergy
21 Student Services) – associated with Defendant Brian Colombana

22 The Receiver continues to work diligently to gain access to financial records
23 and service provider platforms (e.g., Microsoft for Receivership Entity email
24 accounts and Intuit for Receivership Entity online Quickbooks accounts) so she can
25 efficiently provide as much information as is available regarding the scope of the
26 enterprises. Preliminary assessments based on information that is available at this
27 time, are discussed below.

28

1 Although the Receiver and her professionals have made significant progress
2 in a short period of time, this report is preliminary given the short time between
3 entry of the TRO and PI Order and the date of this report. As discussed below in
4 Section V, the Receiver has set out her recommendations for the continued
5 administration of the receivership.

6 **II. FTC COMPLAINT**

7 On November 6, 2018, the Commission filed its Complaint against Impetus,
8 Fig Tree, Tuan Dinh Duong ("Duong"), Brenda Avitia-Pena ("Avitia"), and Brian
9 Colombana ("Colombana"). The Complaint alleges that Impetus and Fig Tree have
10 operated as a common enterprise while engaging in alleged unlawful acts and
11 practices. The Commission's allegations include, but are not limited to,
12 (a) deceptive marketing, misrepresentation of student loan debt relief services, and
13 (b) in connection with telemarketing of student loan debt relief services, requests
14 and receipt of payments of a fee or consideration for debt relief services before debt
15 relief was obtained.

16 **III. THE TRO AND PI Order**

17 Pursuant to the TRO and PI Order, the Receiver is, amongst other things,
18 authorized and directed to:

- 19 1. Assume full control of Receivership Entities by removing...any
20 director, officer, independent contractor, employee, attorney, or agent
21 of any Receivership Entity from control of, management of, or
22 participation in, the affairs of the Receivership Entity;
- 23 2. Take exclusive custody, control, and possession of all Assets and
24 Documents of, or in the possession, custody, or under the control of,
25 any Receivership Entity;
- 26 3. Take exclusive custody, control, and possession of all Documents or
27 Assets associated with the credits, debits, or charges made on behalf of
28 any Receivership Entity, including reserve funds held by payment

1 processors, credit card processors, merchant banks, acquiring banks,
2 independent sales organizations, third party processors, payment
3 gateways, insurance companies or other entities;

4 4. Conserve, hold, manage, and prevent the loss of all Assets of the
5 Receivership Entities, and perform all acts necessary or advisable to
6 preserve the value of those Assets;

7 5. Obtain, conserve, hold, manage, and prevent the loss of all Documents
8 of the Receivership Entities, and perform all acts necessary or advisable
9 to preserve such Documents;

10 6. Obtain, conserve, hold, manage, and prevent the loss of all Documents
11 of the Receivership Entities, and perform all acts necessary or advisable
12 to preserve such Documents;

13 7. Choose, engage, and employ attorneys, accountants, appraisers, and
14 other independent contractors and technical specialists, as the Receiver
15 deems advisable or necessary in the performance of duties and
16 responsibilities under the authority granted by this Order;

17 8. Take all steps necessary to secure and take exclusive custody of each
18 location from which the Receivership Entities operate their businesses.

19 **IV. RECEIVER'S ACTIONS TO IMPLEMENT TRO AND PI ORDER**

20 **A. Securing and Taking Control of Operational Premises**

21 Upon her appointment, the Receiver assumed control over the leased premises
22 located at 1651 E. 4th Street, Santa Ana, CA 92701 (the "Office Premises"), and
23 served the TRO on and retrieved mail from the virtual office locations identified in
24 the TRO (18100 Von Karman Ave. and 2252 Chambers Rd.). The Receiver has
25 made significant efforts to identify other physical locations (numerous former and
26 virtual addresses have been discovered and contacts associated with same thus
27 served), but the one other physical operating location discovered in the United
28 States had been vacated by the time of discovery.

1 With regard to the Office Premises, the Receiver took physical control,
2 changed the locks, served/notified the landlord through property management,
3 served/notified key vendors, and otherwise worked to ensure no entry into the
4 premises. Such physical records have now been moved to secure storage, and the
5 suite has been emptied and turned over to the landlord. Note that the Studora
6 contract employees were given several opportunities to retrieve personal belongings
7 before the space was emptied.

8 Regarding the additional physical location identified in Irvine, and working
9 with the Commission, an Impetus Enterprise, Inc. cancelled check which referenced
10 "rent" was recently received and the entity/payee located. Upon reaching the
11 applicable payee, an insurance services company located in Upland, California, the
12 sublessor (the payee) confirmed the lease with Impetus Enterprise, Inc. (signed by
13 Brenda Avitia). The three-year sublease commenced on March 1, 2018,
14 encompassed 2,720 square feet and was not previously identified or observed
15 through review of other physical records (16510 Bake Parkway, Suite 200, Irvine,
16 California). The sublessor confirmed that the space was completely
17 emptied/vacated; and while timing is not perfectly clear, on or about December 4th,
18 sublessor became aware the space had been vacated upon following up on the late
19 rent payment. He has no indication where the operations and/or subtenant
20 belongings were moved.

21 The Receiver's staff has also checked locations and redirected mail for more
22 than 14 other addresses.

23 **B. Funds Recovered, Known To Date**

24 In addition to the Commission providing notice of the asset freeze, the
25 Receiver also promptly notified each bank and credit card payment processor
26 identified as having an account associated with the Receivership Entities. In such
27 notices, the Receiver demands turnover of the account, immediate cancellation of
28 any debit or credit cards, identification/freeze of any safe deposit box, account

1 balance and reserve information, and account records. As documentation has been
 2 received in response to such demands, the Receiver has spent timing reviewing and
 3 thus pursuing additional leads for service and/or account providers as well as for
 4 additional operating locations and/or business addresses.

5 As previously mentioned, to date, the Receiver has recovered approximately
 6 \$329,000, which includes bank account balances and payment processor reserve
 7 balances.

8 The following is a summary of the cash activity in the receivership estate bank
 9 account and/or Receiver-controlled bank accounts for the period from November 16,
 10 2018 through December 31, 2018:

RECEIVERSHIP ESTATE CASH ACTIVITY:	
Capital Sun Investments – Chase Bank Recovery	\$6,040
Premiere Capital Investments – Chase Bank Recovery	\$13
Fig Tree – Chase Bank Recovery	\$2
Impetus Enterprise – Wells Fargo Bank Recovery	\$27,565
Electronic Merchant Systems Reserve Recovery	\$128,486
Choice Merchant Solutions Reserve Recovery	\$124,905
Madera Merchant Reserve Recovery	\$31,039
Payliance Merchant Reserve Recovery	\$10,558
Operating Expenses Paid	(\$1,325)
Cash Balance as of December 31, 2018	<u>\$327,283</u>

23
 24 Very small additional recoveries from the sale of personal property are
 25 expected to be received in the near term. However, both physical location leases
 26 had significant term remaining, so no recovery of security deposits is anticipated.

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1 **C. Assessing Receivership Entities, Business Operations**

2 The operational appearance of the Office Premises was that of a call center,
3 with a few offices and cubicles located throughout. Through the interviews of
4 employees on site, the Receiver learned that the student loan debt relief services
5 were marketed through mailers, call leads were purchased and that ultimate relief
6 results may not be known (e.g., the company may have to contact the client or
7 Department of Education directly to obtain results). As previously mentioned, call
8 scripts and other similar documents were located, including a document entitled
9 "Mandatory Enrollment Fees". Based upon (a) this document, which states that
10 "First payment needs to be scheduled within 5-10 days of enrollment date", (b) bank
11 records showing six figure monthly receipts, (c) sample customer data pulled from
12 the CRM software showing payment requirements in the contract and payments
13 reflected in the CRM system, and (d) other information gleaned from interviews
14 discussed below, it appears very likely that payments were demanded and/or
15 received prior to services being rendered and/or results delivered.

16 Accordingly, and with no cash available to fund any level of operations (less
17 than \$15 in the Studora-related operating accounts at takeover), the Receiver
18 determined the business could not be operated at all, let alone operated legally and
19 profitably, and therefore suspended operations.

20 **D. Control Over Receivership Entity Records, Electronic Accounts**

21 The Receiver has obtained control over three GoDaddy.com (website hosting,
22 domain registration and email service provider) accounts of the Receivership
23 Entities. Included with these accounts is control to 32 separate domains, a few
24 email accounts with minimal usage and some website files. Due to the fact the TRO
25 and PI Orders did not provide specific reference to the websites and the accounts
26 were held under various names, a considerable effort was undertaken to gain access.
27 Once access was granted, the Receiver was able to redirect traffic from those
28 websites to the receivership website. This effectively shut down the Receivership

1 Entities web presence and disabled the ongoing marketing of the Receivership
2 Entities' debt relief services. It also serves to notify the previous customers of the
3 Receivership Entities of the Receiver's appointment and provides basic information
4 to assist them in their search for debt relief. The Receiver issued a subpoena for
5 documents relating to additional GoDaddy.com accounts that may have been used
6 by the Receivership Entities, which subpoena is currently outstanding.

7 Additionally, as the email accounts controlled by GoDaddy.com appeared to
8 hold very little information, the Receiver continued to search for any other email
9 service providers. As part of that process, the Receiver noted that four domains
10 used Microsoft as the provider of their email services and accordingly issued notice
11 of the PI Order to them. Shortly thereafter, the Receiver was contacted by outside
12 counsel for Microsoft requesting that the Receiver seek a specific order from the
13 Court directing them to turn over access. After various discussions and
14 negotiations, Microsoft agreed to freeze and preserve the accounts, notify the
15 owners of the accounts and then, absent an objection within five days, turn over
16 control to the accounts. That access was just obtained on Friday January 11, 2019.
17 As there are over 240 email accounts related to four domains, the Receiver is
18 currently examining options for securing the data in those accounts.

19 The Receiver has also obtained access to three CRM software platforms and
20 is in the process of obtaining access to Intuit/QuickBooks online accounts. What
21 information will be contained in the QuickBooks accounts is unknown. Additional
22 possible vendors have also been noticed, however substantive or current information
23 from those vendors has been limited.

24 **E. Scope of the Enterprise**

25 Without comprehensive banking and/or accounting records, the Receiver has
26 not been able to identify the entire scope of the Receivership Entities' enterprise, the
27 consumers affected, or the specific amounts invested and expended. However, as a
28 point of reference, she has been able to perform a preliminary analysis and

1 accounting based on bank statements for the Capital Sun Investments, LLC account
2 ending 8336, which was opened on September 29, 2017 and analyzed through
3 November 2018 (what appears to be reflective the Studora operation). Such analysis
4 shows the following:

- 5 • Gross deposits, after adjusting for intercompany transfers, what appear
6 to be a few small loans and retail returns, total \$1,313,000. This
7 number is based solely on bank statement level transactional activity.
8 It does not take into account chargeback/consumer returns and is not
9 based on review of debit (e.g., canceled check) and credit (e.g., deposit
10 slip) level details.
- 11 • A "Conversion" report in the Studora customer management account
12 shows the total fees to date to be \$1,324,000 and returns to date to be
13 \$545,000 – with 3,289 accounts enrolled and 1,412 accounts cancelled.
- 14 • An "Enrollment" report also reflects the net 1,877 (3,289 less 1,412)
15 enrolled and 1,412 cancelled numbers.
- 16 • It should be noted that \$1, 313,000 in fees paid for /3,289 enrollments
17 translates to approximately \$400 per consumer, which is in the general
18 range of fees charged based on documents found at the Office
19 Premises.

20 Additionally, through review of the three CRM databases, the Receiver has
21 observed certain information regarding the potential number of consumers involved
22 for all Receivership Entities, which could be tens of thousands based on contact lists
23 located therein.

24 The Receiver continues to work diligently to gain access to financial records
25 and service providers, including Intuit for Receivership Entity online Quickbooks
26 accounts, so she can work to efficiently gather and provide as much information as
27 is available regarding the scope of the enterprises.

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1 **F. Personal Property**

2 During the Receiver's takeover of the Office Premises, her staff took a
3 photographic inventory. For the most part, the personal property consists of CPU's,
4 computer monitors, cubicles and other miscellaneous office furniture, fixtures and
5 equipment. The Receiver located an auction company who agreed to pay a small
6 sum for and who removed all office items at no cost.

7 **G. Pending Litigation**

8 Not including this action, the Receiver is aware of only one other pending
9 action involving the Receivership Entities. This action was brought by Colombana
10 in Orange County Superior Court against Duong, Avitia, and Impetus. The
11 Receiver, through her counsel, provided notice of the TRO and PI Order and the
12 stay of litigation against the Receivership Entities contained therein to counsel
13 representing Duong, Avitia, and Impetus in that action, the receipt of which has
14 been acknowledged.

15 **H. Territorial Jurisdiction Over Receivership Assets.**

16 By filing the Complaint and the TRO with other federal district courts in the
17 United States, the territorial jurisdiction of this Court over receivership assets is
18 extended to such districts. 28 U.S.C. § 754, *see also Haile v. Henderson Nat'l Bank*,
19 657 Fed. 2d 816, 822 (6th Cir. 1981). Based on information obtained to date, the
20 Receiver has filed the Complaint and TRO in the District of Wyoming and is
21 presently taking steps to file them in the Districts of Utah, Oregon and the Middle
22 District of Florida. As additional information becomes available, the Receiver will
23 file and record the Complaint and the appointment order in applicable districts and
24 counties in conformity with § 754 and the federal law.

25 **I. Borrower/Client Communications.**

26 The Receiver has established a dedicated web page on the Receiver's website
27 which will be used to provide case information, regular updates, and answers to
28 frequently asked questions to employees and customers. The Internet address for

1 the webpage is as follows: [http://www.ethreadvisors.com/ftc-case-docs/ftc-v-](http://www.ethreadvisors.com/ftc-case-docs/ftc-v-impetus-et-al/)
2 [impetus-et-al/](http://www.ethreadvisors.com/ftc-case-docs/ftc-v-impetus-et-al/). In addition, the Receiver is maintaining a dedicated e-mail address
3 and telephone line for all inquiries, which are regularly addressed. The website also
4 includes a platform for people to sign-up for direct updates from the Receiver. To
5 date, approximately 150 people have signed up.

6 Once the Receiver has a more complete list of the known consumers who
7 actually made payments to the Receivership Entities (including their contact
8 information), her intention is to contact them directly, as well as the Department of
9 Education, instructing them to communicate directly with one another and/or
10 referring consumers to free debt counseling services.

11 V. PRELIMINARY RECOMMENDATIONS

12 The Receiver's efforts to marshal and recover assets and relevant
13 Receivership Entity documents and records are ongoing. In the near term, the
14 Receiver and her professionals make the following recommendations.

15 A. Document Recovery Efforts

16 The Receiver will obtain records from all financial institutions and other
17 service providers where the Receivership Entities maintained accounts as well as
18 from attorneys and accountants engaged by the Receivership Entities.

19 B. Receivership Asset Recovery Efforts and Investigation

20 The Receiver will seek to locate any presently unaccounted for receivership
21 assets that may exist. As part of her investigation, the Receiver will evaluate claims
22 to pursue recovery of assets of the Receivership Entities from third parties. The
23 Receiver will seek Court approval before pursuing any such claims.

24 VI. CONCLUSION

25 Based upon the Receiver's early investigation and findings, the Receiver
26 recommends and requests that the Court order the Receiver to continue pursuant to
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1 the Court authorize her continuing investigation and approve this second interim
2 report and recommendations.

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Dated: January 14, 2019


KRISTA L. FREITAG
Receiver

Dated: January 14, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
By: /s/ Edward Fates
EDWARD G. FATES
Attorneys for Court-Appointed
Receiver
KRISTA L. FREITAG

Miscellaneous Filings (Other Documents)

[8:18-cv-01987-JLS-KES Federal Trade Commission v. Impetus Enterprise, Inc. et al](#)

(KESx),DISCOVERY,MANADR,RELATED-G

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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Case Number: [8:18-cv-01987-JLS-KES](#)

Filer: Krista L. Freitag

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Docket Text:

REPORT of Receiver's Second Interim Report filed by Receiver Krista L. Freitag. (Fates, Edward)

8:18-cv-01987-JLS-KES Notice has been electronically mailed to:

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