

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

GLOBAL ACCESS TECHNICAL SUPPORT LLC,  
also d/b/a Global S Connect, Yubdata Tech, and  
Technolive, a Missouri limited liability company;

GLOBAL SMIND LLC, also d/b/a Global S  
Connect, a Missouri limited liability company;

SOURCE PUNDIT LLC, also d/b/a OneSource  
Tech Support, a Missouri limited liability company,

HELIOS DIGITAL MEDIA LLC, a Missouri  
limited liability company;

VGLOBAL ITES PRIVATE LIMITED, an Indian  
corporation;

RAJIV CHHATWAL, individually and as an owner  
or officer of Global Access Technical Support LLC,  
Helios Digital Media LLC, and Source Pundit LLC;

RUPINDER KAUR, individually and as an owner  
or officer of Global sMind LLC; and

NEERAJ DUBEY, individually and as an owner or  
officer of Helios Digital Media, LLC and VGlobal  
ITES Private Limited,

Defendants.

Case No. 4:16-cv-01556HEA

**STIPULATED PRELIMINARY  
INJUNCTION AS TO DEFENDANT  
RUPINDER KAUR**

Plaintiff, the Federal Trade Commission (“FTC” or the “Commission”) and Defendant  
Rupinder Kaur (“Stipulating Defendant”) have stipulated to entry of this Stipulated Preliminary  
Injunction (“Order”). In so doing, the Stipulating Defendant is not admitting any allegations

contained in the Complaint or in any other filing made in this action by Plaintiff. The agreement by the Stipulating Defendant to the entry of this Order is without prejudice to her ability to later contest any such aspects of the action brought by Plaintiff, as she deems appropriate. This Court, having considered the Order and the other filings in this case, and for other cause appearing, hereby orders that:

**FINDINGS OF FACT**

1. This Court has jurisdiction over the subject matter of this case and over Stipulating Defendant;
2. Venue in this district is proper;
3. Plaintiff asserts that there is good cause to believe that Stipulating Defendant has engaged in and is likely to engage in acts or practices that violate Section 5(a) of the FTC Act, 15 U.S.C. § 45(a) in the form of conduct that is the subject of the Commission's Complaint or prohibited by the TRO, including but not limited to any activity related to the marketing or sale of any Tech Support Product or Service, and that Plaintiff is therefore likely to prevail on the merits of this action;
4. Plaintiff asserts that there is good cause to believe that immediate and irreparable harm will result from the Stipulating Defendant's ongoing violations of Section 5(a) of the FTC Act unless Stipulating Defendant is restrained and enjoined by order of this Court;
5. Plaintiff asserts that there is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief for consumers in the form of monetary restitution and/or disgorgement of ill-gotten gains will occur from the transfer, dissipation, or concealment by Stipulating Defendant of her assets or business records unless Stipulating

Defendant is immediately restrained and enjoined by order of this Court. Therefore, there is good cause for an asset freeze;

6. Plaintiff asserts that there is good cause for issuing this Order pursuant to Federal Rule of Civil Procedure 65(b);

7. Plaintiff asserts that weighing the equities and considering Plaintiff's likelihood of ultimate success on the merits, this Order is in the public interest; and

8. The FTC is an independent agency of the United States of America and no security is required of any agency of the United States for the issuance of a preliminary injunction. Fed. R. Civ. P. 65(c); and

9. While Stipulating Defendant contests these assertions by Plaintiff and maintains she has not engaged in, is not presently engaged in, nor in the future is she likely to engage in acts or practices that violate Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), Stipulating Defendant nevertheless stipulates to the entry of this Order insofar as she willingly agrees to be enjoined from engaging in conduct that is the subject of the Commission's Complaint or prohibited by the TRO, including but not limited to any activity related to the marketing or sale of any Tech Support Product or Service. Such stipulation is made without admitting any of the facts asserted by Plaintiff in this case and while reserving the right to challenge any such assertion at a later time.

### **DEFINITIONS**

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

1. "Asset" or "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including, but not limited to, "goods," "instruments," "equipment," "fixtures," "general intangibles," "inventory," "checks," or "notes," (as these terms are defined

in the Uniform Commercial Code), lines of credit, chattels, leaseholds, contracts, mail or other deliveries, shares of stock, lists of consumer names, accounts, credits, premises, receivables, funds, and all cash, wherever located.

2. “**Assisting Others**” includes, but is not limited to: (a) providing administrative services, including, but not limited to, filing business registrations with federal, state, or local government entities, establishing bank or merchant accounts, and/or handling banking transactions; (b) acting as an officer, director, or registered agent of a business entity; (c) establishing mail accounts or mail receiving boxes, and/or providing mailing or printing services; (d) performing customer service functions, including, but not limited to, forwarding mail received from consumers and/or receiving or responding to consumer complaints; (e) formulating or providing, or arranging for the formulation or provision of, any sales script or other marketing material; (f) providing names of, or assisting in the generation of, potential customers; and (g) performing or providing marketing or billing services of any kind, including, but not limited to, performing or providing telemarketing services.

3. “**Commission**” or “**FTC**” means the Federal Trade Commission.

4. “**Corporate Defendant(s)**” means Global Access Technical Support LLC, a Missouri limited liability company, Global sMind LLC, a Missouri limited liability company, Source Pundit LLC, a Missouri limited liability company, Helios Digital Media LLC, a Missouri limited liability company, VGlobal ITES Private Limited, an Indian corporation, and their successors and assigns, as well as any subsidiaries, and any fictitious business entities or business names created or used by these entities, or any of them.

5. “**Defendant(s)**” means all of the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination.

6. “**Document(s)**” is equal in scope and synonymous in meaning to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and any other data compilations from which information can be obtained and translated, if necessary, through detection devices into reasonably usable form. A draft or non-identical copy is a separate document within the meaning of the term.

7. “**Financial Institution**” means any bank, savings and loan institution, credit union, or any financial depository of any kind, including, but not limited to, any brokerage house, trustee, broker-dealer, escrow agent, title company, commodity trading company, or precious metal dealer.

8. “**Individual Defendants**” means Rajiv Chhatwal, Rupinder Kaur, and Neeraj Dubey, by whatever names they may be known.

9. “**Material**” means any fact that is likely to affect a consumer’s choice of, or conduct regarding, goods or services.

10. “**Person(s)**” means a natural person, organization, or other legal entity, including a corporation, limited liability company, partnership, sole proprietorship, association, cooperative, or any other group or combination acting as an entity.

11. “**Plaintiff**” means the Federal Trade Commission.

12. “**Receiver**” means Claire Schenk, the court-appointed Receiver, and her associates, employees, agents, and attorneys.

13. “**Receivership Defendants**” means Global Access Technical Support LLC, a Missouri limited liability company, Global sMind LLC, a Missouri limited liability company, Source Pundit LLC, a Missouri limited liability company, and Helios Digital Media LLC, a

Missouri limited liability company, and their successors and assigns, as well as any subsidiaries, affiliates, divisions, or sales or customer service operations, and any fictitious business entities or business names created or used by these entities.

14. **“Stipulating Defendant”** means Rupinder Kaur, by whatever name she may be known.

15. **“Tech Support Product or Service”** includes any plan, program or software, marketed to repair, maintain or improve a computer’s performance or security, including registry cleaners, anti-virus programs, anti-malware programs, fire wall programs, and computer or software diagnostic services.

**I.**

**PROHIBITED BUSINESS ACTIVITIES**

**IT IS ORDERED** that Stipulating Defendant, and her agents, servants, employees, attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, in connection with the telemarketing, advertising, marketing, promoting, offering for sale, sale, or provision of any good or service, are hereby restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication any material fact, including that:

A. Defendants are part of U.S. technology companies, such as Microsoft or Apple, or are certified or authorized by those companies to service their products; or

B. Defendants have detected performance or security issues on consumers’ computers, including viruses, spyware, malware, or the presence of hackers.

**II.**

**ASSET FREEZE**

**IT IS FURTHER ORDERED** that Stipulating Defendant, and her agents, servants, employees, attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, except as provided herein, as stipulated by the parties, or as directed by further order of the Court, are hereby restrained and enjoined from:

A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any funds, real or personal property, accounts, contracts, shares of stock, lists of consumer names, or other Assets, or any interest therein, wherever located, including outside the United States, that are:

1. Owned, controlled or held by, in whole or in part, for the benefit of, or subject to access by, or belonging to, any Stipulating Defendant;

2. In the actual or constructive possession of any Stipulating Defendant; or  
In the actual or constructive possession of, or owned, controlled, or held by, or subject to access by, or belonging to, any other corporation, partnership, trust, or any other entity directly or indirectly owned, managed, or controlled by, or under common control with, Stipulating Defendant, including, but not limited to, any Assets held by or for Stipulating Defendant in any account at any bank or savings and loan institution, or with any credit card processing agent, automated clearing house processor, network transaction processor, bank debit processing agent, customer service agent, commercial mail receiving agency, or mail holding or forwarding

company, or any credit union, retirement fund custodian, money market or mutual fund, storage company, trustee, or with any broker-dealer, escrow agent, title company, commodity trading company, precious metal dealer, or other financial institution or depository of any kind, either within or outside the territorial United States;

B. Opening or causing to be opened any safe deposit boxes, commercial mail boxes, or storage facilities titled in the name of any Stipulating Defendant, or subject to access by any Stipulating Defendant or under any Stipulating Defendant's control, without providing Plaintiff prior notice and an opportunity to inspect the contents in order to determine that they contain no Assets covered by this Section;

C. Cashing any checks or depositing or processing any payments from customers of Defendants;

D. Incurring charges or cash advances on any credit card issued in the name, singly or jointly, of Stipulating Defendant; or

E. Incurring liens or encumbrances on real property, personal property, or other assets in the name, singly or jointly, of Stipulating Defendant or of any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by Stipulating Defendant.

Notwithstanding the Asset freeze provisions of Section II. A through E above, and subject to prior written agreement with the Commission, Stipulating Defendant may pay from her individual personal funds reasonable, usual, ordinary, and necessary living expenses.

The funds, property, and assets affected by this Section shall include: (1) all assets of the Stipulating Defendant as of the time this Order is entered; and (2) for assets obtained after the time this Order is entered, those assets of the Stipulating Defendant that are derived, directly or indirectly, from the Defendant's activities related to any activity that is the subject of the



Commission's Complaint or prohibited by the TRO, including but not limited to any activity related to the marketing or sale of any Tech Support Product or Service.

Assets held in the names of the following entities are specifically exempted from this Section, and Section III, *infra*:

1. Rasoi 3, LLC;
2. 1041 Taylor, LLC;
3. Clayton1 Construction, LLC;
4. Gateway Petrol, Inc.;
5. Forsyth Associates, LLC;
6. Forsyth Real Estate Holdings 1, LLC;
7. Forsyth Energy, LLC;
8. Sikh Gurudawara of St. Louis; and
9. Mirch Masala Imports, LLC.

### **III.**

#### **DUTIES OF THIRD PARTIES HOLDING STIPULATING DEFENDANT'S ASSETS**

**IT IS FURTHER ORDERED** that any financial institution, business entity, or person maintaining or having custody or control of any account or other asset of Stipulating Defendant, or any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by, or under common control with Stipulating Defendant, which is served with a copy of this Order, or otherwise has actual or constructive knowledge of this Order, shall:

A. Hold and retain within its control and prohibit the withdrawal, removal, assignment, transfer, pledge, hypothecation, encumbrance, disbursement, dissipation,

conversion, sale, liquidation, or other disposal of any of the assets, funds, documents, or other property held by, or under its control:

1. On behalf of, or for the benefit of, Stipulating Defendant or any other party subject to Section II above;
2. In any account maintained in the name of, or for the benefit of, or subject to withdrawal by, Stipulating Defendant or other party subject to Section II above; and
3. That are subject to access or use by, or under the signatory power of, Stipulating Defendant or other party subject to Section II above;

B. Deny Stipulating Defendant access to any safe deposit boxes or storage facilities that are either:

1. Titled in the name, individually or jointly, of any Defendant, or other party subject to Section II above; or
2. Subject to access by any Stipulating Defendant or other party subject to Section II above;

C. Provide Plaintiff, within five (5) business days of the date of service of this Order, a sworn statement setting forth:

1. The identification number of each account or asset titled in the name, individually or jointly, of Stipulating Defendant, or held on behalf of, or for the benefit of, any Stipulating Defendant or other party subject to Section II above, including all trust accounts managed on behalf of Stipulating Defendant or subject to Stipulating Defendant's control;
2. The balance of each such account, or a description of the nature and value of such asset;

3. The identification and location of any safe deposit box, commercial mail box, or storage facility that is either titled in the name, individually or jointly, of Stipulating Defendant, or is otherwise subject to access or control by Stipulating Defendant or other party subject to Section II above, whether in whole or in part; and

4. If the account, safe deposit box, storage facility, or other asset has been closed or removed, the date closed or removed and the balance on said date;

D. Within five (5) business days of a request from Plaintiff, provide Plaintiff with copies of all records or other documents pertaining to each such account or asset, including, but not limited to, originals or copies of account applications, account statements, corporate resolutions, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs; and

E. This Section shall apply to existing accounts and assets, assets deposited or accounts opened after the effective date of this Order, and any accounts or assets maintained, held or controlled three years prior to the effective date of this Order. This Section shall not prohibit transfers in accordance with any provision of this Order, any further order of the Court, or by written agreement of the parties.

#### IV.

#### **MAINTAIN RECORDS AND REPORT NEW BUSINESS ACTIVITY**

**IT IS FURTHER ORDERED** that Stipulating Defendant, and her agents, servants, employees, attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly

or through any trust, corporation, subsidiary, division, or other device, are hereby restrained and enjoined from:

A. Failing to make and keep books, records, accounts, bank statements, current accountants' reports, general ledgers, general journals, cash receipts ledgers, cash disbursements ledgers and source documents, documents indicating title to real or personal property, and any other data which, in reasonable detail, accurately and fairly reflect the incomes, disbursements, transactions, dispositions, and uses of Stipulating Defendant's assets;

B. Destroying, erasing, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, any documents, including electronically stored materials, that relate in any way to the business practices or business or personal finances of the Stipulating Defendant; to the business practices or finances of entities directly or indirectly under the control of the Stipulating Defendant; or to the business practices or finances of entities directly or indirectly under common control with any other Stipulating Defendant; and

C. Creating, operating, or exercising any control over any new business entity, whether newly formed or previously inactive, including any partnership, limited partnership, joint venture, sole proprietorship or corporation, without first providing Plaintiff with a written statement disclosing: (1) the name of the business entity; (2) the address, telephone number, e-mail address, and website address of the business entity; (3) the names of the business entity's officers, directors, principals, managers, and employees; and (4) a detailed description of the business entity's intended activities.

V.

**PROHIBITION ON DISCLOSING CUSTOMER INFORMATION**

**IT IS FURTHER ORDERED** that Stipulating Defendant, and her officers, agents, servants, employees, attorneys, and all other persons or entities in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, are hereby restrained and enjoined from:

A. Selling, renting, leasing, transferring, or otherwise disclosing the name, address, birth date, telephone number, e-mail address, Social Security number, credit card number, bank account number, or other financial or identifying personal information of any person from whom or about whom any Defendant obtained such information in connection with activities alleged in Plaintiff's Complaint; and

B. Benefiting from or using the name, address, birth date, telephone number, e-mail address, Social Security number, credit card number, bank account number, or other financial or identifying personal information of any person from whom or about whom any Defendant obtained such information in connection with activities alleged in Plaintiff's Complaint;

*Provided, however,* that Stipulating Defendant may disclose such financial or identifying personal information to a law enforcement agency or as required by any law, regulation, or court order.

VI.

**COOPERATION WITH THE RECEIVER**

**IT IS FURTHER ORDERED** that:

A. Stipulating Defendant and her agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, shall fully cooperate with and assist the Receiver. This cooperation and assistance shall include, but not be limited to:

1. Providing any information to the Receiver that the Receiver deems necessary to exercising the authority and discharging the responsibilities of the Receiver;
2. Providing any password required to access any computer, electronic file, or telephonic data in any medium; or
3. Advising all persons who owe money to the Receivership Defendants that all debts should be paid directly to the Receiver.

B. Stipulating Defendant and her agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, are hereby restrained and enjoined from directly or indirectly:

1. Transacting any of the business of the Receivership Defendants;
2. Destroying, secreting, defacing, transferring, or otherwise altering or disposing of any documents of the Receivership Defendants, including, but not limited to, books, records, accounts, writings, drawings, graphs, charts, photographs, audio and video

recordings, computer records, and other data compilations, electronically-stored records, or any other records of any kind or nature;

3. Transferring, receiving, altering, selling, encumbering, pledging, assigning, liquidating, or otherwise disposing of any assets owned, controlled, or in the possession or custody of, or in which an interest is held or claimed by, the Receivership Defendants, or the Receiver;

4. Excusing debts owed to the Receivership Defendants;

5. Failing to notify the Receiver of any asset, including accounts, of the Receivership Defendants held in any name other than the name of the Receivership Defendants, or by any person or entity other than the Receivership Defendants, or failing to provide any assistance or information requested by the Receiver in connection with obtaining possession, custody, or control of such assets;

6. Doing any act or refraining from any act whatsoever to interfere with the Receiver's taking custody, control, possession, or managing of the assets or documents subject to this receivership; or to harass or interfere with the Receiver in any way; or to interfere in any manner with the exclusive jurisdiction of this Court over the assets or documents of the Receivership Defendants; or to refuse to cooperate with the Receiver or the Receiver's duly authorized agents in the exercise of their duties or authority under any Order of this Court; or

7. Filing, or causing to be filed, any petition on behalf of the Receivership Defendants for relief under the United States Bankruptcy Code, 11 U.S.C. § 101 et seq., without prior permission from this Court.

**VII.**

**REPATRIATION OF ASSETS AND DOCUMENTS**

**IT IS FURTHER ORDERED** that Stipulating Defendant shall:

A. Within three (3) business days following service of this Order, take such steps as are necessary to preserve for repatriation to the territory of the United States of America all documents and assets that are located outside such territory and are held by or for Stipulating Defendant or are under Stipulating Defendant's direct or indirect control, jointly, severally, or individually;

B. Within three (3) business days following service of this Order, provide Plaintiff with a full accounting of all documents and assets that are located outside of the territory of the United States of America or that have been transferred to the territory of the United States of America pursuant to Subsection A above and are held by or for Stipulating Defendant or are under any Stipulating Defendant's direct or indirect control, jointly, severally, or individually, including the names and addresses of any foreign or domestic financial institution or other entity holding the documents and assets, along with the account numbers and balances;

C. Hold and retain all such documents and assets and prevent any transfer, disposition, or dissipation whatsoever of any such documents or assets; and

D. Within three (3) business days following service of this Order, provide Plaintiff access to Stipulating Defendant's records and documents held by financial institutions or other entities outside the territory of the United States of America, by signing and delivering to Plaintiff's counsel the Consent to Release of Financial Records attached to this Order as Attachment A, if she has not done so already in compliance with the TRO.



**VIII.**

**INTERFERENCE WITH REPATRIATION**

**IT IS FURTHER ORDERED** that Stipulating Defendant is hereby restrained and enjoined from taking any action, directly or indirectly, which may result in the encumbrance or dissipation of foreign assets, or in the hindrance of the repatriation required by the preceding Section VII of this Order, including, but not limited to:

A. Sending any statement, letter, facsimile, e-mail or wire transmission, or telephoning or engaging in any other act, directly or indirectly, that results in a determination by a foreign trustee or other entity that a “duress” event has occurred under the terms of a foreign trust agreement, until such time that assets have been fully repatriated pursuant to the preceding Section of this Order; and

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 Order, until such time as assets have been fully repatriated pursuant to the preceding Section of this Order.

**IX.**

**EXPEDITED DISCOVERY**

**IT IS FURTHER ORDERED** that pursuant to Federal Rules of Civil Procedure 30(a), 31(a), 34, and 45, and notwithstanding the provisions of Federal Rules of Civil Procedure 26(d) and (f), 30(a)(2)(A), and 31(a)(2)(A), the parties are granted leave, at any time after entry of this Order to:

A. Take the deposition of any person, whether or not a party, for the purpose of discovering the nature, location, status, and extent of the assets of Stipulating Defendant, and

Stipulating Defendant's affiliates and subsidiaries; the nature and location of documents reflecting the business transactions of Stipulating Defendant, and Stipulating Defendant's affiliates and subsidiaries; the location of any premises where Stipulating Defendant, directly or through any third party, conduct business operations; the Stipulating Defendant's whereabouts; and/or the applicability of any evidentiary privileges to this action; and

B. Demand the production of documents from any person, whether or not a party, relating to the nature, status, and extent of the assets of Stipulating Defendant, and Stipulating Defendant's affiliates and subsidiaries; the nature and location of documents reflecting the business transactions of Stipulating Defendant, and Stipulating Defendant's affiliates and subsidiaries; the location of any premises where Stipulating Defendant, directly or through any third party, conduct business operations; the Stipulating Defendant's whereabouts; and/or the applicability of any evidentiary privileges to this action.

Three (3) business days notice shall be deemed sufficient for any such deposition, five (5) business days notice shall be deemed sufficient for the production of any such documents, and twenty-four (24) hours notice shall be deemed sufficient for the production of any such documents that are maintained or stored only as electronic data. The provisions of this Section shall apply both to parties to this case and to non-parties. The limitations and conditions set forth in Federal Rules of Civil Procedure 30(a)(2)(A)(ii) and 31(a)(2)(A)(ii) regarding subsequent depositions of an individual shall not apply to depositions taken pursuant to this Section. Any such depositions taken pursuant to this Section shall not be counted toward any limit on the number of depositions under the Federal Rules of Civil Procedure, including those set forth in Federal Rules of Civil Procedure 30(a)(2)(A) and 31(a)(2)(A). Service of discovery upon a party, taken pursuant to this Section, shall be sufficient if made through the means described in

Section XI of this Order.

**X.**

**DISTRIBUTION OF ORDER BY STIPULATING DEFENDANT**

**IT IS FURTHER ORDERED** that Defendants shall immediately provide a copy of this Order to each of their corporations, subsidiaries, affiliates, partners, divisions, sales entities, successors, assigns, members, officers, directors, employees, independent contractors, agents, servants, attorneys, spouses, representatives, and any other persons in active concert or participation with them. Within five (5) business days following service of this Order, Stipulating Defendant shall file with this Court and serve on Plaintiff an affidavit identifying the name, title, addresses, telephone numbers, date of service, and manner of service of the persons and entities Stipulating Defendant has served with a copy of this Order in compliance with this provision.

**XI.**

**SERVICE OF THIS ORDER**

**IT IS FURTHER ORDERED** that copies of this Order may be distributed by United States First Class Mail, overnight delivery, facsimile, electronic mail, or personally, by agents or employees of Plaintiff, by agents or employees of the Receiver, by any law enforcement agency, or by private process server, upon any person, financial institution, or other entity that may have possession or control of any property, property right, document, or asset of Stipulating Defendant, or that may be subject to any provision of this Order. Service upon any branch or office of any financial institution or entity shall effect service upon the entire financial institution or entity.

**XII.**

**CONSUMER REPORTING AGENCIES**

**IT IS FURTHER ORDERED** that, pursuant to Section 604 of the Fair Credit Reporting Act, 15 U.S.C. § 1681b, any consumer reporting agency may furnish a consumer or credit report concerning Stipulating Defendant to Plaintiff.

**XIII.**

**CORRESPONDENCE WITH AND NOTICE TO PLAINTIFF**

**IT IS FURTHER ORDERED** that, for purposes of this Order, all correspondence and pleadings to the Commission shall be addressed to:

Elizabeth Scott  
Samantha Gordon  
Federal Trade Commission  
55 West Monroe Street, Suite 1825  
Chicago, Illinois 60603  
(312) 960-5634 [Telephone]  
(312) 960-5600 [Facsimile]  
[escott@ftc.gov](mailto:escott@ftc.gov) [Scott Email]  
[sgordon@ftc.gov](mailto:sgordon@ftc.gov) [Gordon email]

**XIV.**

**RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for all purposes.

**So Stipulated:**

DAVID SHONKA  
Acting General Counsel

Dated: November 15, 2016

/s/Samantha Gordon  
Elizabeth C. Scott  
Illinois Bar Number: 6278075  
Samantha Gordon  
Illinois Bar Number: 6272135  
Federal Trade Commission, Midwest Region  
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Attorneys for Plaintiff  
*FEDERAL TRADE COMMISSION*

**DOWD BENNETT LLP**

By: /s/ James E. Crowe, III (with permission)  
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St. Louis, Missouri 63105

*Attorneys for Defendant*  
*Rupinder Kaur*

SO ORDERED, this 15<sup>th</sup> day of November, 2016, at 1:46 p.m.

  
\_\_\_\_\_  
Hon. Henry E. Autrey  
United States District Judge  
Eastern District of Missouri