

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**Federal Trade Commission, and
State of Ohio ex rel. Attorney General
Dave Yost,**

Plaintiffs,

v.

**Educare Centre Services, Inc., a New
Jersey corporation, also dba Credit Card
Services, Card Services, Credit Card
Financial Services, Care Net, Tripletel
Inc., Revit Educ Srvc, L.L. Vision, Care
Value Services, and Card Value Services,**

**Tripletel, Inc., a Delaware
corporation,**

**Prollink Vision, S.R.L., a
Dominican Republic limited
liability company,**

**9896988 Canada Inc., a
Canadian company,**

**Globex Telecom, Inc., a Nevada
corporation,**

**9506276 Canada, Inc., dba
Globex Telecom, Inc., a
Canadian company,**

**Sam Madi, individually and as
an owner, officer, member, and/or
manager of Educare Centre
Services, Inc.,**

**Mohammad Souheil a/k/a
Mohammed Souheil and Mike
Souheil, individually and as an
owner, officer, member, and/or
manager of Educare Centre
Services, Inc., 9896988 Canada,
Inc., Globex Telecom, Inc.,**

EP-19-CV-196-KC

**[PROPOSED]
STIPULATED ORDER FOR
PERMANENT INJUNCTION AS TO
DEFENDANTS WISSAM JALIL AND
TRIPLETEL, INC.**

1 9506276 Canada, Inc., and
2 Prolink Vision, S.R.L.,

3 **Wissam Abedel Jalil a/k/a Sam**
4 **Jalil**, individually and as an
5 owner, officer, member, and/or
6 manager of Tripletel, Inc., and
7 Prolink Vision, S.R.L.,

8 **Charles Kharouf**, individually
9 and as an owner, officer, member,
10 and/or manager of Educare
11 Centre Services, Inc., and
12 Prolink Vision, S.R.L.,

13 **Defendants.**

14 Plaintiffs, the Federal Trade Commission (“FTC” or “Commission”) and the State
15 of Ohio, (collectively, “Plaintiffs”) filed its First Amended Complaint for Permanent
16 Injunction and Other Equitable Relief (ECF No. 81) pursuant to Section 13(b) of the FTC
17 Act, 15 U.S.C. § 53(b), the Telemarketing and Consumer Fraud and Abuse Prevention
18 Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108, the Ohio Consumer Sales Practices
19 Act (“CSPA”), O.R.C. 1345.07, and the Ohio Telephone Solicitation Sales Act
20 (“TSSA”), O.R.C. 4719.01 *et seq.* Plaintiffs and Defendants Wissam Jalil and Tripletel,
21 Inc. (“Jalil Defendants”) stipulate to the entry of this Stipulated Order for Permanent
22 Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this
23 action between them.

24 **THEREFORE, IT IS ORDERED** as follows:

25 **FINDINGS**

- 26 1. This Court has jurisdiction over this matter.
- 27 2. The First Amended Complaint charges that the Jalil Defendants participated in
28 acts or practices that violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), the

1 Telemarketing Sales Rule (“TSR”), 16 C.F.R. Part 310, the Ohio CSPA, O.R.C. 1345.01
2 *et seq.*, and the Ohio TSSA, O.R.C. 4719.01 *et seq.*

3 3. The Jalil Defendants neither admit nor deny any of the allegations in the First
4 Amended Complaint, except as specifically stated in this Order. Only for purposes of this
5 action, the Jalil Defendants admit the facts necessary to establish jurisdiction.

6 4. The Jalil Defendants waive any claim that they may have under the Equal Access
7 to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the
8 date of this Order, and agree to bear their own costs and attorney fees.

9 5. The Jalil Defendants and Plaintiffs waive all rights to appeal or otherwise
10 challenge or contest the validity of this Order.

11
12 **DEFINITIONS**

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

14 A. **“Corporate Defendant”** means Tripletel, Inc. and each of its subsidiaries,
15 affiliates, successors, and assigns.

16 B. **“Debt Relief Product or Service”** means any product, service, plan or program
17 represented, expressly or by implication, to renegotiate, settle, or in any way alter the
18 terms of payment or other terms of the debt or obligation between a consumer and one or
19 more creditors or debt collectors, including a reduction in the balance, interest rate, or
20 fees owed by a consumer to a creditor or debt collector.

21 C. **“Defendants”** means Prolink Vision, S.R.L., 9896988 Canada, Inc., Educare
22 Centre Services, Inc., Tripletel, Inc., Mohammad Souheil, Sam Madi, Charles Kharouf,
23 Wissam Jalil, Globex Telecom, Inc., and 9506276 Canada, Inc., individually,
24 collectively, or in any combination.
25
26
27
28

1 D. **“Document”** is synonymous in meaning and equal in scope to the usage of
2 “document” and “electronically stored information” in Federal Rule of Civil Procedure
3 34(a), Fed. R. Civ. P. 34(a), and includes writings, drawings, graphs, charts, photographs,
4 sound and video recordings, images, Internet sites, web pages, websites, electronic
5 correspondence, including e-mail and instant messages, contracts, accounting data,
6 advertisements, FTP Logs, Server Access Logs, books, written or printed records,
7 handwritten notes, telephone logs, telephone scripts, receipt books, ledgers, personal and
8 business canceled checks and check registers, bank statements, appointment books,
9 computer records, customer or sales databases and any other electronically stored
10 information, including Documents located on remote servers or cloud computing
11 systems, and other data or data compilations from which information can be obtained
12 directly or, if necessary, after translation into a reasonably usable form. A draft or non-
13 identical copy is a separate Document within the meaning of the term
14
15

16 E. **“Person”** means any natural person or any entity, corporation, partnership, or
17 association of persons.
18

19 F. **“Receiver”** means the receiver appointed in Section VIII of this Order and any
20 deputy receivers that shall be named by the Receiver.

21 G. **“Seller”** means any Person who, in connection with a Telemarketing transaction,
22 provides, offers to provide, or arranges for others to provide goods or services to a
23 customer in exchange for consideration.
24

25 H. **“Telemarketer”** means any Person who, in connection with Telemarketing,
26 initiates or receives telephone calls to or from a customer or donor.
27
28

1 I. **“Telemarketing”** means any plan, program, or campaign that is conducted to
2 induce the purchase of goods or services or a charitable contribution by use of one or
3 more telephones.

4 **ORDER**

5 **I. DEBT RELIEF PRODUCT OR SERVICE BAN**

6 **IT IS THEREFORE ORDERED** that the Jalil Defendants are permanently
7 restrained and enjoined from advertising, marketing, promoting, or offering for sale, or
8 assisting in the advertising, marketing, promoting, or offering for sale of any Debt Relief
9 Product or Service, including any credit card interest rate reduction service.
10

11 **II. TELEMARKETING BAN**

12 **IT IS FURTHER ORDERED** that the Jalil Defendants are permanently
13 restrained and enjoined from participating in Telemarketing to the United States, whether
14 directly or through an intermediary.
15

16 **III. PROHIBITED MISREPRESENTATIONS AND OMISSIONS**

17 **IT IS THEREFORE ORDERED** that the Jalil Defendants and their officers,
18 agents, and employees, and all other Persons in active concert or participation with them,
19 who receive actual notice of this Order by personal service or otherwise, whether acting
20 directly or indirectly, in connection with the advertising, marketing, promoting, or
21 offering for sale of any goods or services, are restrained and enjoined from
22 misrepresenting or assisting others in misrepresenting, expressly or by implication, any
23 material fact, including, but not limited to:
24

25 A. Misrepresenting, or assisting others in misrepresenting, expressly or by
26 implication, any of the following:
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. Any material aspect of the nature or terms of the Seller's refund, cancellation, exchange, or repurchase policies, or
2. Any other fact material to consumers concerning any good or service, such as: the total costs; any material restrictions, limitations or conditions; or any material aspect of its performance, efficacy, nature, or central characteristics;

B. Representing, or assisting others in representing, expressly or by implication, the benefits, performance, or efficacy of any good or service, unless the representation is non-misleading, and, at the time such representation is made, the Jalil Defendants possess and rely upon competent and reliable evidence to substantiate that the representation is true.

IV. PROHIBITIONS ON VIOLATING THE OHIO CSPA AND TSSA

IT IS FURTHER ORDERED that the Jalil Defendants, and their officers, agents, and employees, and all other Persons in active concert or participation with them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or indirectly, are permanently restrained and enjoined from engaging in unfair or deceptive acts or practices in violation of the Ohio CSPA, R.C. 1345.01 *et seq.* and the Ohio TSSA, O.R.C. 4719.01 *et seq.*

1 **V. EQUITABLE MONETARY JUDGMENT AND PARTIAL SUSPENSION**
2 **IT IS FURTHER ORDERED** that:

3 A. Judgment in the amount of \$2.8 Million Dollars (\$2,800,000.00) is entered in
4 favor of Plaintiffs against the Jalil Defendants, jointly and severally, as equitable
5 monetary relief. Full payment of the foregoing amount shall be suspended upon
6 satisfaction of the obligations set forth in Subsection B of this Section, and subject to the
7 conditions set forth in Subsections C-E of this Section.
8

9 B. Effective upon the entry of this Order, the Jalil Defendants shall surrender to
10 Plaintiffs or their representatives all control, title, dominion, and interest in the following
11 assets: (1) all funds held in the BMO Harris Bank account in the name of Tripletel, Inc.
12 ending in X3867; and (2) all Tripletel, Inc. funds in accounts in the name of Madera
13 Merchant Services, LLC. The remainder of the judgment is suspended, subject to
14 Subsections C, D, and E, below.
15

16 C. Plaintiffs' agreement to the suspension of part of the judgment as to the Jalil
17 Defendants is expressly premised upon the truthfulness, accuracy, and completeness of
18 the following sworn financial statements and related documents (collectively, "financial
19 representations") submitted to the Commission by the Jalil Defendants, including:
20

- 21 1. The Financial Statement of Wissam Jalil as last updated on November 7,
22 2019, including the attachments; and
- 23 2. The Financial Statement of Tripletel, Inc. signed on November 8, 2019,
24 including the attachments.
25

26 D. The suspension of the judgment will be lifted as to any Jalil Defendant if, upon
27 motion by the Plaintiffs, the Court finds that a Jalil Defendant failed to disclose any
28 material asset, materially misstated the value of any asset, or made any other material

1 misstatement or omission in the financial representations identified above.

2 E. If the suspension of the judgment is lifted, the judgment becomes immediately
3 due as to that Jalil Defendant in the amount of **\$2.8 Million Dollars (\$2,800,000.00)**
4 specified in Subsection A, above, which the parties stipulate represents the consumer
5 injury alleged in the First Amended Complaint, less any payment previously made
6 pursuant to this Section, plus interest computed from the date of entry of this Order.
7

8 **VI. ADDITIONAL MONETARY PROVISIONS**

9 **IT IS FURTHER ORDERED** that:

10 A. The Jalil Defendants relinquish dominion and all legal and equitable right, title,
11 and interest in all assets transferred pursuant to this Order and may not seek the return of
12 any assets.

13 B. The facts alleged in the First Amended Complaint will be taken as true, without
14 further proof, in any subsequent civil litigation by or on behalf of the Plaintiffs, including
15 in a proceeding to enforce their rights to any payment or monetary judgment pursuant to
16 this Order, such as a nondischargeability complaint in any bankruptcy case.
17

18 C. The facts alleged in the First Amended Complaint establish all elements necessary
19 to sustain an action by the Plaintiffs pursuant to Section 523(a)(2)(A) of the Bankruptcy
20 Code, 11 U.S.C. §523(a)(2)(A), and this Order will have collateral estoppel effect for
21 such purposes.
22

23 D. The Jalil Defendants acknowledge that their Taxpayer Identification Numbers
24 (Social Security Numbers or Employer Identification Numbers) or equivalent, which the
25 Jalil Defendants previously submitted to the Commission, may be used for collecting and
26 reporting on any delinquent amount arising out of this Order, in accordance with 31
27 U.S.C. §7701.
28

1 E. All money paid to the Plaintiffs pursuant to this Order may be deposited into a
2 fund administered by the Commission or its designee on behalf of the Commission and
3 the State of Ohio to be used for equitable relief, including consumer redress and any
4 attendant expenses for the administration of any redress fund. If a representative of the
5 Plaintiffs decides that direct redress to consumers is wholly or partially impracticable or
6 money remains after redress is completed, the Plaintiffs may apply any remaining money
7 for such other equitable relief (including consumer information remedies) as it
8 determines to be reasonably related to the Jalil Defendants' practices alleged in the First
9 Amended Complaint. Any money not used for such equitable relief shall be divided
10 between the Commission and the State of Ohio to be deposited to the U.S. Treasury as
11 disgorgement and to the Ohio Attorney General's Telemarketing Fraud Enforcement
12 Fund. The Jalil Defendants have no right to challenge any actions the Plaintiffs or their
13 representatives may take pursuant to this Subsection.

16 **VII. CUSTOMER INFORMATION**

17 **IT IS FURTHER ORDERED** that the Jalil Defendants and their officers, agents,
18 and employees, and all other Persons in active concert or participation with them, who
19 receive actual notice of this Order by personal service or otherwise, are permanently
20 restrained and enjoined from directly or indirectly:

22 A. Failing to provide sufficient customer information to enable the Commission to
23 efficiently administer consumer redress. If Plaintiffs' representative requests in writing
24 any information related to redress, Jalil Defendant must provide it, in the form prescribed
25 by Plaintiffs' representative, within fourteen (14) days; and

27 B. Disclosing, using, or benefitting from customer information, including the name,
28

1 address, telephone number, email address, Social Security number, other identifying
2 information, or any data that enables access to a customer's account (including a credit
3 card, bank account, or other financial account), that any Jalil Defendant obtained prior to
4 entry of this Order in connection with any activity that pertains to marketing credit card
5 interest rate reduction services; and

6
7 C. Failing to destroy such customer information in all forms in their possession,
8 custody, or control within thirty (30) days after receipt of written direction to do so from
9 a representative of the Plaintiffs.

10 Provided, however, that customer information need not be disposed of, and may
11 be disclosed, to the extent requested by a government agency or required by law,
12 regulation, or court order.

13
14 **VIII. APPOINTMENT OF RECEIVER**

15 **IT IS FURTHER ORDERED** that **Robb Evans & Associates LLC** is appointed
16 as receiver of Tripletel, Inc. with full powers of an equity receiver, for the purpose of
17 taking the necessary steps to wind down Tripletel, Inc. In carrying out these duties, the
18 Receiver shall be the agent of this court, shall be accountable directly to this court, and is
19 authorized and directed to:

20
21 A. Perform all acts necessary to protect, conserve, preserve, and prevent waste or
22 dissipation of Tripletel, Inc. assets, if any, until their sale;

23 B. Sell Tripletel, Inc.'s assets without further order of the court;

24 C. Enter into agreements in connection with the reasonable and necessary
25 performance of the Receiver's duty to sell Tripletel, Inc.'s assets, including, but not
26
27
28

1 limited to, the retention of assistants, agents, or other professionals to assist in the sale of
2 these Assets;

3 D. Distribute to the FTC, without further order of the court, the funds received from
4 the sale of Tripletel, Inc.'s assets;

5 E. Take any and all steps the Receiver concludes are appropriate to wind down
6 Tripletel, Inc.; and

7 F. Store and secure Tripletel, Inc.'s records, until either entry of a final order against
8 the last remaining Defendant in this proceeding or receipt of written direction to do so
9 from a representative of the FTC.
10

11 **IX. COOPERATION**

12 IT IS FURTHER ORDERED that the Jalil Defendants must fully cooperate with
13 representatives of the Plaintiffs in this case and in any investigation related to or
14 associated with the transactions or the occurrences that are the subject of the First
15 Amended Complaint. The Jalil Defendants must provide truthful and complete
16 information, evidence, and testimony. The Jalil Defendants must appear in person,
17 telephonically, or via videoconference, for interviews, discovery, hearings, trials, and any
18 other proceedings that Plaintiffs' representative may reasonably request upon ten (10)
19 days written notice, or other reasonable notice, at such reasonable places and times as
20 Plaintiffs' representative may designate, without the service of a subpoena.
21

22 **X. ORDER ACKNOWLEDGMENTS**

23 IT IS FURTHER ORDERED that the Jalil Defendants obtain acknowledgments
24 of receipt of this Order:
25
26
27
28

1 A. Each Jalil Defendant, within seven (7) days of entry of this Order, must submit to
2 the Plaintiffs an acknowledgment of receipt of this Order sworn under penalty of perjury.

3 B. For five (5) years after entry of this Order, Defendant Wissam Jalil for any
4 business that he, individually or collectively with any other Defendant, is the majority
5 owner or controls directly or indirectly, and each Corporate Defendant, must deliver a
6 copy of this Order to: (1) all principals, officers, directors, and LLC managers and
7 members; (2) all employees having managerial responsibilities for conduct related to the
8 subject matter of the Order and all agents and representatives who participate in conduct
9 related to the subject matter of the Order; and (3) any business entity resulting from any
10 change in structure as set forth in the Section titled Compliance Reporting. Delivery
11 must occur within seven (7) days of entry of this Order for current personnel. For all
12 others, delivery must occur before they assume their responsibilities.
13
14

15 **XI. COMPLIANCE REPORTING**

16 IT IS FURTHER ORDERED that the Jalil Defendants make timely submissions
17 to the Plaintiffs:

18 A. One year after entry of this Order, each Jalil Defendant must submit a compliance
19 report, sworn under penalty of perjury:

20
21 1. Each Jalil Defendant must: (a) identify the primary physical, postal, and
22 email address and telephone number, as designated points of contact, which
23 representatives of the Plaintiffs may use to communicate with Jalil Defendant; (b)
24 identify all of that Jalil Defendant's businesses by all of their names, telephone
25 numbers, and physical, postal, email, and Internet addresses; (c) describe the
26 activities of each business, including the goods and services offered, the means of
27
28

1 advertising, marketing, and sales, and the involvement of any other Defendant
2 (which Defendant Wissam Jalil must describe if he knows or should know due to
3 his own involvement); (d) describe in detail whether and how that Jalil Defendant
4 is in compliance with each Section of this Order; and (e) provide a copy of each
5 Order Acknowledgment obtained pursuant to this Order, unless previously
6 submitted to the Plaintiffs.
7

8 2. Additionally, Defendant Wassim Jalil must: (a) identify all telephone
9 numbers and all physical, postal, email and Internet addresses, including all
10 residences; (b) identify all business activities, including any business for which he
11 performs services whether as an employee or otherwise and any entity in which
12 he has any ownership interest; and (c) describe in detail his involvement in each
13 such business, including title, role, responsibilities, participation, authority,
14 control, and any ownership.
15

16 B. For ten (10) years after entry of this Order, each Jalil Defendant must submit a
17 compliance notice, sworn under penalty of perjury, within fourteen (14) days of any
18 change in the following:
19

20 1. Each Jalil Defendant must report any change in: (a) any designated point
21 of contact; or (b) the structure of any Corporate Defendant or any entity that Jalil
22 Defendant has any ownership interest in or controls directly or indirectly that may
23 affect compliance obligations arising under this Order, including: creation,
24 merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that
25 engages in any acts or practices subject to this Order.
26
27
28

1 2. Additionally, Defendant Wassim Jalil must report any change in: (a)
2 name, including aliases or fictitious name, or residence address; or (b) title or role
3 in any business activity, including any business for which he performs services
4 whether as an employee or otherwise and any entity in which he has any
5 ownership interest, and identify the name, physical address, and any Internet
6 address of the business or entity.
7

8 C. Each Jalil Defendant must submit to the Plaintiffs notice of the filing of any
9 bankruptcy petition, insolvency proceeding, or similar proceeding by or against such
10 Defendant within fourteen (14) days of its filing.

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

17 E. Unless otherwise directed by a Plaintiffs’ representative in writing, all
18 submissions to the Commission pursuant to this Order must be emailed to
19 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate
20 Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission,
21 600 Pennsylvania Avenue NW, Washington, DC 20580; the subject line must begin:
22 *FTC et al., v. Educare Centre Services, Inc. X190039.*
23

24 F. Unless otherwise directed by a Plaintiffs’ representative in writing, all
25 submissions to the Ohio Attorney General pursuant to this Order must be emailed to:
26 Erin.Leahy@OhioAttorneyGeneral.gov or mailed to: Ohio Attorney General’s Office,
27

28

1 Consumer Protection Section, Attn: Compliance Unit, 30 East Broad Street, 14th Floor,
2 Columbus, Ohio 43215; the subject line must begin: FTC/Ohio v. Educare Centre
3 Services, Inc.
4

5 **XII. RECORDKEEPING**

6 IT IS FURTHER ORDERED that the Jalil Defendants must create certain records
7 for ten (10) years after entry of the Order, and retain each such record for five (5) years.

8 Specifically, Corporate Defendant and Defendant Wissam Jalil for any business that such
9 Jalil Defendant, individually or collectively with any other Defendant, is a majority
10 owner or controls directly or indirectly, must create and retain the following records:
11

12 A. Accounting records showing the revenues from all goods or services sold;

13 B. Personnel records showing, for each Person providing services, whether as an
14 employee or otherwise, that Person's: name; addresses; telephone numbers; job title or
15 position; dates of service; and (if applicable) the reason for termination;
16

17 C. Records of all consumer complaints and refund requests, whether received
18 directly or indirectly, such as through a third party, and any response; and

19 D. All records necessary to demonstrate full compliance with each provision of this
20 Order, including all submissions to the Plaintiffs.
21

22 **XIII. COMPLIANCE MONITORING**

23 IT IS FURTHER ORDERED that, for the purpose of monitoring the Jalil
24 Defendants' compliance with this Order, including the financial representations upon
25 which part of the judgment was suspended and any failure to transfer any assets as
26 required by this Order:
27
28

1 A. Within fourteen (14) days of receipt of a written request from a representative of
2 the Plaintiffs, each Jalil Defendant must: submit additional compliance reports or other
3 requested information, which must be sworn under penalty of perjury; appear for
4 depositions via telephone or videoconference; and produce documents for inspection and
5 copying. The Plaintiffs are also authorized to obtain discovery, without further leave of
6 court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30
7 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

9 B. For matters concerning this Order, the Plaintiffs are authorized to communicate
10 directly with each Jalil Defendant. Jalil Defendant must permit representatives of the
11 Plaintiffs to interview any employee or other Person affiliated with any Jalil Defendant
12 who has agreed to such an interviewd. The Person interviewed may have counsel present

14 C. The Plaintiffs may use all other lawful means, including posing, through its
15 representatives as consumers, suppliers, or other individuals or entities, to Jalil
16 Defendants or any individual or entity affiliated with Jalil Defendants, without the
17 necessity of identification or prior notice. Nothing in this Order limits the Plaintiffs'
18 lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15
19 U.S.C. §§ 49, 57b-1.

21 D. Upon written request from a representative of the Plaintiffs, any consumer
22 reporting agency must furnish consumer reports concerning Defendant Wissam Jalil,
23 pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).
24
25
26
27
28

XIV. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED, this _____ day of _____, 2020.

KATHLEEN CARDONE
UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Christopher E. Brown
J. Ronald Brooke, Jr.
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-8528
Washington, DC 20580
(202) 326-2825 / cbrown3@ftc.gov
(202) 326-3484 / jbrooke@ftc.gov

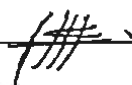
Attorneys for Plaintiff
FEDERAL TRADE COMMISSION


Erin Leahy (Ohio Bar #69509)
W. Travis Garrison (Ohio Bar #76757)
Assistant Attorney General
Ohio Attorney General's Office
Consumer Protection Section
30 E. Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 752-4730
Erin.Leahy@OhioAttorneyGeneral.gov
Travis.Garrison@OhioAttorneyGeneral.gov

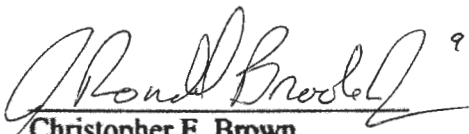
Attorneys for Plaintiff
STATE OF OHIO

Tripletel, Inc. 

By: WISSAM JALIL

Wissam Jalil 


Haroon Rafati, Esq.
The Rafati Law Firm, PLLC
Attorney for Defendants Wissam Jalil and Tripletel, Inc.



9-21-20

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Christopher E. Brown
J. Ronald Brooke, Jr.
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-8528
Washington, DC 20580
(202) 326-2825 / cbrown3@ftc.gov
(202) 326-3484 / jbrooke@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION


Erin Leahy (Ohio Bar #69509)
W. Travis Garrison (Ohio Bar #76757)
Assistant Attorney General
Ohio Attorney General's Office
Consumer Protection Section
30 E. Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 752-4730
Erin.Leahy@OhioAttorneyGeneral.gov
Travis.Garrison@OhioAttorneyGeneral.gov

Attorneys for Plaintiff
STATE OF OHIO

Tripletel, Inc. 

By: WISSAM JALIL

Wissam Jalil 


Haroon Rafati, Esq.
The Rafati Law Firm, PLLC
Attorney for Defendants Wissam Jalil and Tripletel, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Christopher E. Brown
J. Ronald Brooke, Jr.
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-8528
Washington, DC 20580
(202) 326-2825 / cbrown3@ftc.gov
(202) 326-3484 / jbrooke@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Erin Leahy 9/21/2020

Erin Leahy (Ohio Bar #69509)
W. Travis Garrison (Ohio Bar #76757)
Assistant Attorney General
Ohio Attorney General's Office
Consumer Protection Section
30 E. Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 752-4730
Erin.Leahy@OhioAttorneyGeneral.gov
Travis.Garrison@OhioAttorneyGeneral.gov

Attorneys for Plaintiff
STATE OF OHIO

Tripletel, Inc.
By:

Wissam Jalil

Haroon Rafati, Esq.
The Rafati Law Firm, PLLC
Attorney for Defendants Wissam Jalil and Tripletel, Inc.