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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**VICEROY MEDIA SOLUTIONS, LLC**, also  
d/b/a quick-jobs.com and localjobsindex.com, a  
California limited liability corporation;

**VOLTRON INTERACTIVE, LLC**, a Delaware  
limited liability corporation;

**SUNIL KANDA**, individually and as an owner of  
VICEROY MEDIA SOLUTIONS, LLC and  
VOLTRON INTERACTIVE, LLC; and

**QUYNH TRAN**, a/k/a/ Kayli Tran, individually  
and as an owner of VICEROY MEDIA  
SOLUTIONS, LLC and VOLTRON  
INTERACTIVE, LLC,

Defendants.

**Case No. 3:23-cv-3516**

**STIPULATED ORDER FOR  
CIVIL PENALTY JUDGMENT,  
PERMANENT INJUNCTION,  
AND OTHER RELIEF**

Plaintiff, the United States of America, acting upon notification and authorization to the  
Attorney General the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint

STIPULATED ORDER FOR CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION,  
AND OTHER RELIEF

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1 for Civil Penalties, Permanent Injunction, and other relief (“Complaint”), for a permanent  
2 injunction, civil penalties, and other relief in this matter, pursuant to Sections 5(a)(1),  
3 5(m)(1)(A), 13(b), 16(a), and 19 of the Federal Trade Commission Act (“ TC Act”), 15 U.S.C.  
4 §§ 45(a), 45(m)(1)(A), 53(b), 56(a), and 57b. Defendants have waived service of the summons  
5 and the Complaint. Plaintiff and defendants stipulate to the entry of this Stipulated Order for  
6 Civil Penalty Judgment, Permanent Injunction, and other relief (“Order”) to resolve all matters  
7 in dispute in this action between them.

8 TH, IT IS as follows:

9 0 **I. FINDINGS**

1 1. This Court has jurisdiction over this matter.

11 2. The Complaint charges that defendants participated in deceptive acts or practices  
12 in violation of Section 5 of the TC Act, 15 U.S.C. § 45, and the Telemarketing Sales Rule (the  
13 “TSR” or “Rule”), as amended, 16 C.F.R. Part 31, in connection with (a) acquiring consumer  
14 data using websites purportedly offering consumers job or education opportunities, and then (b)  
15 selling the consumer data to third parties.

16 3. Defendants waive any claim that they may have under the Equal Access to Justice 0  
17 Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order,  
18 and agree to bear their own costs and attorney fees.

19 4. Defendants and Plaintiff waive all rights to appeal or otherwise challenge or  
20 contest the validity of this Order.

21 **II. DEFINITIONS**

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

23 A. “**Affirmative Express Consent**” means, upon being presented with unambiguous  
24 options to provide or withhold consent, an affirmative act communicating specific, informed, and  
25 unambiguous authorization to collection and sale, transfer, or disclosure of Covered Information.

26 The following does not constitute Affirmative Express Consent:

27 1. Inferring consent from the hovering over, muting, pausing, or closing of a

28 STIPULATED CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION, 0  
AND OTHER RELIEF

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1 0 given piece of content by the consumer; or 0

2 0 2. Obtaining consent through a user interface that has the substantial effect of  
3 0 subverting or impairing user autonomy, decision-making, or choice.

4 B. **“Clear(ly) and Conspicuous(ly)”** means that a required disclosure is difficult to  
5 miss (i.e., easily noticeable) and easily understandable by ordinary consumers, including in all of  
6 the following ways:

7 1. In any communication that is solely visual or solely audible, the disclosure  
8 must be made through the same means through which the communication is  
9 presented. In any communication made through both visual and audible means,  
1 0 such as a television advertisement, the disclosure must be presented  
11 simultaneously in both the visual and audible portions of the communication even  
12 if the representation requiring the disclosure is made in only one means.

13 0 2. A visual disclosure, by its size, contrast, location, the length of time it  
14 appears, and other characteristics, must stand out from any accompanying text or  
15 other visual elements so that it is easily noticed, read, and understood.

16 0 3. An audible disclosure, including by telephone or streaming video, must be  
17 delivered in a volume, speed, and cadence sufficient for ordinary consumers to  
18 easily hear and understand it.

19 4. In any communication using an interactive electronic medium, such as the  
2 Internet or software, the disclosure must be unavoidable.

21 5. The disclosure must use diction and syntax understandable to ordinary  
22 consumers and must appear in each language in which the representation that  
23 0 requires the disclosure appears.

24 6. The disclosure must comply with these requirements in each medium  
25 through which it is received, including all electronic devices and face-to-face  
26 communications.

27 7. The disclosure must not be contradicted or mitigated by, or inconsistent 0

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with, anything else in the communication. 0

8. This disclosure must not be presented to the consumer through a hyperlink or hoverbox.

9. When the representation or sales practice targets a specific audience, such as children, the elderly, or the terminally ill, “ordinary consumers” includes 0 reasonable members of that group.

C. “Covered Information” means information from or about an individual consumer, including (a) first and last name; (b) a home or other physical address, including street name, name of city or town, or zip code; (c) an email address or other online contact information, such as a social media username; (d) a telephone number, including mobile number; (e) gender; (f) age or date of birth; (g) response to any survey or multiple-choice question about circumstances specific to the consumer, such as education level, employment status, or household debt; or (h) any information combined with any of (a) through (g).

“Defendants” means all of the Individual Defendants and all of the Corporate Defendants, individually, collectively, or in any combination.

1. “Corporate Defendants” means Viceroy Media Solutions, LLC, Voltron Interactive, LLC, and their successors and assigns.

2. “Individual Defendants” means Sunil Kanda and Quynh Tran.

“Lead Generation” means (a) using marketing techniques to identify or attract prospective customers’ interest in a third party’s product or service; (b) obtaining, or assisting others in obtaining, Covered Information of prospective customers for a third-party’s product or service; or (c) providing any such Covered Information of prospective customers to a third party. 0

For purposes of this definition, the term “third party” does not include service providers or their sub-processors that (a) provide services to Defendants; (b) use or receive Covered Information at Defendants’ direction or to detect, prevent, or investigate security incidents or fraud, or to comply with regulatory obligations; and (c) do not pay or receive payment as consideration for 0 the Covered Information provided by Defendants.

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1           .         **“Outbound Telephone Call”** means a telephone call initiated by a Telemarketer  
2 to induce the purchase of goods or services or to solicit a charitable contribution.

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

6           H.       **“Seller”** means any person who, in connection with a Telemarketing transaction,  
7 provides, offers to provide, or arranges for others to provide goods or services to the customer in  
8 exchange for consideration.

9           I.       **“Telemarketer”** means any person who, in connection with Telemarketing,  
1 initiates or receives telephone calls to or from a customer or donor.

11           J.       **“Telemarketing”** means any plan, program, or campaign which is conducted to  
12 induce the purchase of goods or services or a charitable contribution by use of one or more  
13 telephones and which involves more than one interstate telephone call. The term does not  
14 include the solicitation of sales through the mailing of a catalog which: contains a written  
15 description or illustration of the goods or services offered for sale; includes the business address  
16 of the Seller; includes multiple pages of written material or illustrations; and has been issued not  
17 less frequently than once a year, when the person making the solicitation does not solicit  
18 customers by telephone but only receives calls initiated by customers in response to the catalog  
19 and during those calls takes orders only without further solicitation.   or purposes of the previous  
2 sentence, the term “further solicitation” does not include providing the customer with  
21 information about, or attempting to sell, any other item included in the same catalog which  
22 prompted the customer’s call or in a substantially similar catalog.

23                                 **III.    BAN ON ROBOCALLS**

24           IT IS                   that   efendants, whether acting directly or through an intermediary,  
25 are permanently restrained and enjoined from initiating, causing others to initiate, or assisting  
26 others in initiating any   utbound Telephone Call that plays or delivers a prerecorded message.

28 STIPULATED AND AGREED TO BY THE DEFENDANTS IN THE CAPTIONED MATTER AND BY THE PLAINTIFFS IN THE CAPTIONED MATTER.  
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**IV. REQUIREMENTS RELATED TO THE SALE, TRANSFER, OR DISCLOSURE OF COVERED INFORMATION**

IT IS U TH 0 that efendants, efendants’ officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this rder, whether acting directly or indirectly, are permanently restrained and enjoined from:

A. In connection with Lead Generation, collecting and selling, transferring, or otherwise disclosing any consumer’s Covered Information or promoting or offering for sale any good or service, whether directly or through an intermediary to any Person, unless efendants have:

1. Clearly and Conspicuously disclosed to the consumer, separate and apart from any “privacy policy,” “terms and conditions,” “terms of service,” or other similar document:

- a. The specific purpose(s) for which the Covered Information is being collected, sold, transferred, or disclosed; 0
- b. 0 The categories of Covered Information that will be sold, transferred, or 0 disclosed;
- c. 0 The name of every Person who collects the Covered Information, where the name disclosed must be that of a natural person, legal entity, or registered BA;
- d. 0 The name of every Person to whom the Covered Information will be sold, transferred, or disclosed, where the name disclosed must be that of a natural person, legal entity, or registered BA;
- e. 0 All purposes for which each recipient will use the Covered Information;
- f. 0 The categories of Covered Information, if any, that the recipient will sell, transfer, or disclose to third parties;
- g. The name of each Person to whom the recipient will sell, transfer, or

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disclose the Covered Information, where the name disclosed must be that of a natural person, legal entity, or registered BA.

h. A simple, easily located means for the consumer to withdraw authorization to collection, sale, transfer, or distribution of the consumer's Covered Information;

i. Any limitations on the consumer's ability to withdraw authorization to collection, sale, transfer, or distribution of the consumer's Covered Information; and

j. All other information material to the provision of authorization to collection, sale, transfer, or distribution of the consumer's Covered Information;

2. Obtained, after making the disclosures set forth in Subsection A(1) of this Section, the consumer's Affirmative Express Consent to the collection and sale, transfer, or disclosure of the consumer's Covered Information; and

3. Obtained a signed and dated certification from the recipient of the Covered Information stating:

a. The name and nature of the recipient's business(es), including the purpose(s) for obtaining consumers' Covered Information;

b. The recipient's physical address(es) for conducting business;

c. All of the recipient's trade name(s), alter egos, BA names, fictitious names, or aliases under which the recipient conducts or has conducted business;

d. All of the recipient's businesses licenses, and business registrations;

e. A description of the recipient's business, including describing the nature of goods or services sold and the nature of sale:

f. That Covered Information will not be used for any purpose other than the specific purpose(s) stated in the required disclosure under Subsection A(1)

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of this Section; and

- g. The identity of each Person with whom the recipient will share the Covered Information and all purposes for which each Person will use the Covered Information obtained from the recipient; or

B. Taking any action to provoke, encourage, compel, or mislead any consumer to provide Affirmative Express Consent, including:

- 1. Requiring Affirmative Express Consent as a condition of use of the services on any website owned or operated by defendants or the opportunity to purchase, earn, or qualify for any reward; or
- 2. Obtaining Affirmative Express Consent through a user interface that fails to provide a clear option to proceed without providing consent.

**V. MANDATORY DISCLOSURE ON EMPLOYMENT SITES**

IT IS U TH that defendants, defendants’ officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this order, whether acting directly or indirectly, are permanently restrained and enjoined from failing, on all pages of any Lead Generation website related to employment that collects Covered Information, to disclose Clearly and Conspicuously and in a manner that is visible without scrolling:

“This site contains a list of third-party job postings and is not affiliated with any employer. To apply to a specific job, visit the employer’s website.”

**VI. JUDGMENT FOR CIVIL PENALTY AND PARTIAL SUSPENSION**

IT IS U TH that:

A. Judgment in the amount of Nine Hundred Thirteen Thousand, Six Hundred and Ninety-Six dollars (\$913,696) is entered in favor of Plaintiff against Corporate defendants, jointly and severally, as a civil penalty.

B. Corporate defendants are ordered to pay to Plaintiff, by making payment to the Treasurer of the United States, one Hundred fifty Thousand dollars (\$150,000), which, as

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1 Corporate defendants stipulate, their undersigned counsel holds in escrow for no purpose other  
2 than payment to Plaintiff. Such payment must be made within 7 days of entry of this order by  
3 electronic fund transfer in accordance with instructions previously provided by a representative  
4 of Plaintiff.

5 C. In the event that the Corporate defendants fail to make the required payment  
6 when due under Subsection B above, the entire judgment becomes immediately due in the  
7 amount specified in Subsection A above, less any partial payment previously made pursuant to  
8 this Section, plus interest computed from the date of entry of this order. Upon such payment,  
9 the remainder of the judgment is suspended, subject to the Subsections below.

10 . The Commission’s and Plaintiff’s agreement to the suspension of part of the  
11 judgment is expressly premised upon the truthfulness, accuracy, and completeness of Corporate  
12 defendants’ sworn financial statements and related documents (collectively, “financial  
13 representations”) submitted to the Commission, namely:

- 14 1. The financial Statements of Corporate defendants Viceroy Media Solutions and
- 15 Voltron Interactive on January 24 and 26, 2023; and
- 16 2. All financial documents submitted by Corporate defendants to Commission
- 17 Counsel.

18 . The suspension of the judgment will be lifted as to any Corporate defendant if,  
19 upon motion by the Commission or Plaintiff, the Court finds that Corporate defendants failed to  
20 disclose any material asset, materially misstated the value of any asset, or made any other  
21 material misstatement or omission in the financial representations identified above.

22 . If the suspension of the judgment is lifted, the judgment becomes immediately  
23 due as to Corporate defendants in the amount specified in Subsection A above, which the parties  
24 stipulate only for purposes of this Section represents the amount of the civil penalty for the  
25 violations alleged in the Complaint, less any payment previously made pursuant to this Section,  
26 plus interest computed from the date of entry of this order.

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28 STIPULATED AND ENTERED IN FULL SATISFACTION OF THE CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION,

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**VII. ADDITIONAL MONETARY PROVISIONS**

IT IS U TH 9 that:

A. efendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this rder and may not seek the return of any assets.

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission, including in a proceeding to enforce its rights to any payment or monetary judgment pursuant to this rder, such as a nondischargeability complaint in any bankruptcy case.

C. The facts alleged in the Complaint establish all elements necessary to sustain an action by the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this rder will have collateral estoppel effect for such purposes.

. efendants agree that the civil penalty judgment represents a civil penalty owed to the government of the United States, is not compensation for actual pecuniary loss, and, therefore, as to the Individual efendants, it is not subject to discharge under the Bankruptcy Code pursuant to 11 U.S.C. § 523(a)(7).

. efendants acknowledge that their Taxpayer Identification Numbers (Social Security Numbers or mpoyer Identification Numbers), which efendants must submit to the Commission, may be used for collecting and reporting on any delinquent amount arising out of this rder, in accordance with 31 U.S.C. §7701.

. All money received by the Commission pursuant to this rder may be deposited into a fund administered by the Commission or its designee to be used for consumer relief, such as redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after such redress is completed, the Commission may apply any remaining money for such related relief (including consumer information remedies) as it determines to be reasonably related to efendants’ practices alleged in the Complaint. Any money not used for relief is to be deposited to the U.S. Treasury as an additional civil penalty.

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1 defendants have no right to challenge any actions the Commission or its representatives may  
2 take pursuant to this Subsection.

3 **VIII. CUSTOMER INFORMATION**

4 IT IS U TH that defendants, defendants’ officers, agents, employees, 0  
5 and attorneys, and all other persons in active concert or participation with any of them, who  
6 receive actual notice of this order, are permanently restrained and enjoined from directly or  
7 indirectly:

8 A. Failing to provide sufficient customer information to enable the Commission to  
9 efficiently administer consumer redress. If a representative of the Commission requests in  
10 writing any information related to redress, defendants must provide it, in the form prescribed by  
11 the Commission, within 14 days;

12 B. Within 3 days after receipt of written direction to do so from a representative of  
13 the Commission, failing to destroy Covered Information in all forms, including the name,  
14 address, phone number, email address, gender, date of birth, or any survey question responses,  
15 that are in any defendant’s possession, custody, or control and was obtained prior to entry of this  
16 order in connection with the advertising, marketing, or promotion of any employment  
17 opportunities, *provided, however*, that a customer’s information need not be deleted to the extent  
18 requested by a government agency or as required by a law, regulation, or court order;

19 C. For any Covered Information not deleted pursuant to Subsection B of this Section,  
20 selling, transferring, or disclosing such information to any Person, unless defendants first  
21 comply with Section IV and Subsection VIII( ) of this order;

22 . Within 6 days after the effective date of this order, failing to:

- 23 0 1. Identify each Person who has accessed, received, or acquired a consumer’s 0  
24 Covered Information from any defendant without the consumer’s Affirmative  
25 express Consent;  
26 2. Identify with specificity what categories of Covered Information was 0  
27 disclosed to each Person identified in Subsection (1) of this Section; or

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3. Submit a list of the information identified in Subsections (1)–(2) of this Section and a description of the methodologies used to identify that information to: [brief@ftc.gov](mailto:brief@ftc.gov) or sent by overnight courier (not the U.S. Postal Service) to: Associate Director of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 6 Pennsylvania Avenue NW, Washington, DC 20581. The subject line must begin: “In re Quick-Jobs.com, [X-number]”;

Within 9 days after the effective date of this order, failing to:

1. Provide a copy of the Complaint and order to all Persons identified under Subsection ( ) (1) of this Section;

2. Notify each such Person in writing that the Federal Trade Commission alleges that defendants disclosed Covered Information of consumers to them in a manner that was unfair or deceptive and in violation of the TC Act and TS ;

3. Instruct each such Person in writing that Covered Information accessed, received, or acquired from defendants prior to the effective date of this order:

a. Shall not be used for Telemarketing;

b. To the extent such Person has not yet used the Covered Information for Telemarketing, must be destroyed; and

c. To the extent such Person has used the Covered Information for Telemarketing, may be retained by such Person for the sole purpose of attempting to comply with state and federal recordkeeping requirements applicable to Telemarketing;

where such instruction shall include a list of names or other unique identifiers sufficient for the Person to identify the records, together with the categories of Covered Information identified in Subsection (2) of this Section and demand written confirmation that the Person has complied with the requirements of Subsection (3) of this Section;

4. Provide a copy of the instructions sent under Subsection (3) of this

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Section to brief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 6 Pennsylvania Avenue NW, Washington, DC

258. The subject line must begin: "In re Quick-Jobs.com, [X-number]"; or

5. Provide, within 5 days of receipt, each written confirmation under

Subsection (3) of this Section to brief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 6 Pennsylvania Avenue NW, Washington, DC 258. The subject line must begin: "In re Quick-Jobs.com, [X-number]"; or

. Selling, transferring, or disclosing Covered Information to any Person identified in Subsection (1) of this Section unless Defendants have first:

1. Confirmed the Person's receipt of the instructions provided under Subsection (3);
2. Received from the Person a written confirmation of compliance with those instructions; and
3. Complied with Section X of this Order.

**IX. COOPERATION**

IT IS ORDERED that Defendants must fully cooperate with representatives of Plaintiff and the Commission in this case and in any investigation related to or associated with the transactions or the occurrences that are the subject of the Complaint. Defendants must provide truthful and complete information, evidence, and testimony. Individual Defendants must appear and Corporate Defendants "must cause Defendants' officers, employees, representatives, or agents to appear" for interviews, discovery, hearings, trials, and any other proceedings that a Plaintiff or Commission representative may reasonably request upon 5 days written notice, or other reasonable notice, at such places and times as a Plaintiff or Commission representative may designate, without the service of a subpoena.

STIPULATED CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION, 0  
AND THEREFORE

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**X. ORDER ACKNOWLEDGMENTS**

IT IS U TH 0 that efendants obtain acknowledgments of receipt of this rder:

A. ach efendant, within 7 days of entry of this rder, must submit to the Commission an acknowledgment of receipt of this rder sworn under penalty of perjury.

B. or 5 years after entry of this rder, each Individual efendant for any business that such efendant, individually or collectively with any other efendant, is the majority owner or controls directly or indirectly, and each Corporate efendant must deliver a copy of this rder to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for conduct related to the subject matter of the rder and all agents and representatives who participate in conduct related to the subject matter of the rder; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance eporting. elivery must occur within 7 days of entry of this rder for current personnel. or all others, delivery must occur before they assume their responsibilities.

C. rom each individual or entity to which a efendant delivered a copy of this rder, that efendant must obtain, within 3 days, a signed and dated acknowledgment of receipt of this rder. 0

**XI. COMPLIANCE REPORTING**

IT IS U TH that efendants make timely submissions to the Commission:

A. ne year after entry of this rder, each efendant must submit a compliance report, sworn under penalty of perjury:

1. E ach efendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission and Plaintiff may use to communicate with efendant; (b) identify all of that efendant’s businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c)

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1 0 describe the activities of each business, including the goods and services offered, 0  
2 the means of advertising, marketing, and sales, and the involvement of any other  
3 defendant (which Individual defendants must describe if they know or should  
4 know due to their own involvement); (d) describe in detail whether and how that 0  
5 defendant is in compliance with each Section of this order; and (e) provide a  
6 copy of each order Acknowledgment obtained pursuant to this order, unless  
7 0 previously submitted to the Commission.

8 2. Additionally, Individual defendants must: (a) identify all telephone  
9 numbers and all physical, postal, email and Internet addresses, including all  
10 0 residences; (b) identify all business activities, including any business for which  
11 such defendant performs services whether as an employee or otherwise and any  
12 entity in which such defendant has any ownership interest; and (c) describe in  
13 0 detail such defendant's involvement in each such business, including title, role,  
14 responsibilities, participation, authority, control, and any ownership.

15 B. For 1 year after entry of this order, each defendant must submit a compliance  
16 notice, sworn under penalty of perjury, within 14 days of any change in the following:

17 1. Each defendant must report any change in: (a) any designated point of  
18 contact; or (b) the structure of any Corporate defendant or any entity that  
19 defendant has any ownership interest in or controls directly or indirectly that may  
2 affect compliance obligations arising under this order, including: creation,  
21 merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that  
22 engages in any acts or practices subject to this order.

23 0 2. Additionally, Individual defendants must report any change in: (a) name,  
24 0 including aliases or fictitious name, or residence address; or (b) title or role in any 0  
25 0 business activity, including any business for which such defendant performs  
26 0 services whether as an employee or otherwise and any entity in which such  
27 defendant has any ownership interest, and identify the name, physical address,

28 STIPULATED CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION,  
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and any Internet address of the business or entity. 0

C. Each defendant must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such defendant within 14 days of its filing.

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

. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this order must be emailed to [brief@ftc.gov](mailto:brief@ftc.gov) or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 6 Pennsylvania Avenue NW, Washington, DC 20581. The subject line must begin: TC v. Quick-Jobs.com, Matter No. 2123 88.

**XI. RECORDKEEPING**

IT IS ORDERED that defendants must create certain records for 1 years after entry of the order, and retain each such record for 5 years. Specifically, Corporate Defendants 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, whether received directly or indirectly, such as through a third party, and any response;

. All documents reflecting Affirmative Express Consent collected as required under Subsection IV(A)(1), including:

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1 0 1. The name and contact information submitted by the person providing Affirmative  
2 0 xpress Consent;

3 0 2. A copy of the public-facing user interface containing the request for Affirmative  
4 xpress Consent, including all required disclosures, maintained in the same manner and  
5 format in which it would be presented to the person providing the Affirmative xpress  
6 Consent;

7 0 3. The purpose for which Affirmative xpress Consent was requested and obtained;

8 4. All information gathered or collected from the person providing Affirmative  
9 xpress Consent;

1 5. The date that the Affirmative xpress Consent was obtained; and

11 6. Any additional information necessary to establish defendants' compliance with  
12 requirements for Affirmative xpress Consent, as defined in this order;

13 0 . All certifications obtained as required under Subsection IV(A)(2);

14 . All written confirmations obtained under Subsection VIII( ) (3);

15 G. All records of any market, behavioral, or psychological research, or user,  
16 0 customer, or usability testing, including any A/B or multivariate testing, copy  
17 0 testing, surveys, focus groups, interviews, clickstream analysis, eye or mouse  
18 tracking studies, heat maps, or session replays or recordings concerning the  
19 subject matter of this order; and

2 H. All records necessary to demonstrate full compliance with each provision of this  
21 order, including all submissions to the Commission.

22 **XII. COMPLIANCE MONITORING**

23 IT IS U TH that, for the purpose of monitoring defendants' compliance 0  
24 with this order, including the financial representations upon which part of the judgment was  
25 suspended and any failure to transfer any assets as required by this order:

26 A. Within 14 days of receipt of a written request from a representative of the  
27 Plaintiff, each defendant must: submit additional compliance reports or other requested 0

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1 information, which must be sworn under penalty of perjury; appear for depositions; and produce  
2 documents for inspection and copying. The Commission and Plaintiff are also authorized to  
3 obtain discovery, without further leave of court, using any of the procedures prescribed by  
4 federal rules of Civil Procedure 29, 31 (including telephonic depositions), 31, 33, 34, 36, 45,  
5 and 69. 0

6 B. For matters concerning this order, the Commission and Plaintiff are authorized to 0  
7 communicate directly with each defendant. Defendant must permit representatives of the  
8 Commission and Plaintiff to interview any employee or other person affiliated with any  
9 defendant who has agreed to such an interview. The person interviewed may have counsel  
10 present.

11 C. The Commission and Plaintiff may use all other lawful means, including posing,  
12 through its representatives as consumers, suppliers, or other individuals or entities, to defendants 0  
13 or any individual or entity affiliated with defendants, without the necessity of identification or  
14 prior notice. Nothing in this order limits the Commission’s lawful use of compulsory process,  
15 pursuant to Sections 9 and 2 of the TC Act, 15 U.S.C. §§ 49, 57b-1.

16 **XIII. RETENTION OF JURISDICTION**

17 IT IS ORDERED that this Court retains jurisdiction of this matter for 0  
18 purposes of construction, modification, and enforcement of this order.

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 Date: 0 \_\_\_\_\_

\_\_\_\_\_ 0  
21 Hon.  
22 United States District Judge  
23 Northern District of California  
24  
25  
26  
27

28 STIPULATION AND AGREEMENT, CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION, 0

1 **SO STIPULATED AND AGREED:**

2 **FOR PLAINTIFF:**

3 **THE UNITED STATES OF AMERICA**

4 BRIAN M. BOYNTON  
5 Principal Deputy Assistant Attorney General  
6 Civil Division

7 ARUN G. RAO  
8 Deputy Assistant Attorney General

9 AMANDA N. LISKAMM  
10 Director  
11 Consumer Protection Branch

12 RACHAEL L. DOUD  
13 Assistant Director  
14 Consumer Protection Branch

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24 ISMAIL J. RAMSEY  
25 United States Attorney

26 MICHELLE LO  
27 Chief, Civil Division

28 /s/ Kenneth W. Brakebill  
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Assistant United States Attorney  
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Kenneth.Brakebill@usdoj.gov

Date: 7/14/23

STIPULATED ORDER FOR CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION,  
AND OTHER RELIEF

**FEDERAL TRADE COMMISSION:**

*Denise Oki*

ate: 7/13/2023

ENISE M. OKI  
Attorney  
Federal Trade Commission  
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denise.oki@ftc.gov

**FOR DEFENDANTS: Viceroy Media Solutions LLC, Voltron Interactive LLC, and Sunil Kanda,**

DocuSigned by:

*Sunil Kanda*  
7DCC45494400498...

ate: 4/27/2023

SUNIL KANDA,  
INDIVIDUALLY AND AS AN OFFICER  
OF VICE VOYAGE MEDIA SOLUTIONS LLC, AND  
VOLTRON INTERACTIVE LLC

**FOR DEFENDANTS: Viceroy Media Solutions LLC, Voltron Interactive LLC, and Quynh Tran**

DocuSigned by:

*Quynh Tran*  
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ate: 4/27/2023

QUYNH TRAN,  
INDIVIDUALLY AND AS AN OFFICER  
OF VICE VOYAGE MEDIA SOLUTIONS LLC, AND  
VOLTRON INTERACTIVE LLC

**APPROVED AS TO FORM:**

*Laura Iposo Van Ruff*

ate: 4/28/2023

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STIPULATE TO THE CIVIL PENALTY JUDGMENT, PERMANENT INJUNCTION,  
AND THE FINE