

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

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**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**

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

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

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

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23 C. **“Defendants”** means Prolink Vision, S.R.L., 9896988 Canada, Inc., Educare  
24 Centre Services, Inc., Tripletel, Inc., Mohammad Souheil, Sam Madi, Charles Kharouf,  
25 Wissam Jalil, Globex Telecom, Inc., and 9506276 Canada, Inc., individually,  
26 collectively, or in any combination.  
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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  
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16 E. **“Person”** means any natural person or any entity, corporation, partnership, or  
17 association of persons.

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



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

**ORDER**

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

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

**II. TELEMARKETING BAN**

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

**III. PROHIBITED MISREPRESENTATIONS AND OMISSIONS**

**IT IS THEREFORE 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, in connection with the advertising, marketing, promoting, or offering for sale of any goods or services, are restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication, any material fact, including, but not limited to:

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

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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       D.       The suspension of the judgment will be lifted as to any Jalil Defendant if, upon  
26 motion by the Plaintiffs, the Court finds that a Jalil Defendant failed to disclose any  
27 material asset, materially misstated the value of any asset, or made any other material  
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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.  
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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 C. The facts alleged in the First Amended Complaint establish all elements necessary  
18 to sustain an action by the Plaintiffs pursuant to Section 523(a)(2)(A) of the Bankruptcy  
19 Code, 11 U.S.C. §523(a)(2)(A), and this Order will have collateral estoppel effect for  
20 such purposes.  
21

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

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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:

21  
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

26  
27 B. Disclosing, using, or benefitting from customer information, including the name,  
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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, in  
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.

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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;  
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24 B. Sell Tripletel, Inc.'s assets without further order of the court;  
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26 C. Enter into agreements in connection with the reasonable and necessary  
27 performance of the Receiver's duty to sell Tripletel, Inc.'s assets, including, but not  
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limited to, the retention of assistants, agents, or other professionals to assist in the sale of these Assets;

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

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

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

**IX. COOPERATION**

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

**X. ORDER ACKNOWLEDGMENTS**

IT IS FURTHER ORDERED that the Jalil Defendants obtain acknowledgments of receipt of this Order:

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.

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 1. Each Jalil Defendant must: (a) identify the primary physical, postal, and  
21 email address and telephone number, as designated points of contact, which  
22 representatives of the Plaintiffs may use to communicate with Jalil Defendant; (b)  
23 identify all of that Jalil Defendant's businesses by all of their names, telephone  
24 numbers, and physical, postal, email, and Internet addresses; (c) describe the  
25 activities of each business, including the goods and services offered, the means of  
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advertising, marketing, and sales, and the involvement of any other Defendant (which Defendant Wissam Jalil must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how that Jalil Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Plaintiffs.

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

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

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

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

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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 C. Records of all consumer complaints and refund requests, whether received  
17 directly or indirectly, such as through a third party, and any response; and
  - 18 D. All records necessary to demonstrate full compliance with each provision of this  
19 Order, including all submissions to the Plaintiffs.
- 20

21 **XIII. COMPLIANCE MONITORING**

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

THIS ORDER IS MADE FOR THE PURPOSES OF THE ORDER AND IS NOT INTENDED TO PRECLUDE THE COURT FROM MAKING MODIFICATIONS OF THIS ORDER FOR PURPOSES OF CORRECTION, MODIFICATION, AND ENFORCEMENT OF THE ORDER.

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.  
8

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  
13

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.  
20

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).  
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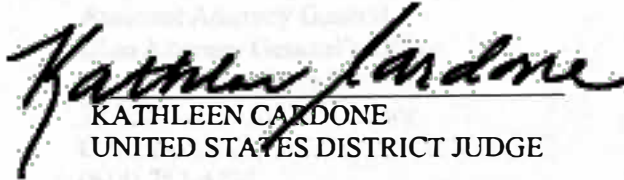


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**XIV. RETENTION OF JURISDICTION**

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 22nd day of September, 2020.


  
KATHLEEN CARDONE  
UNITED STATES DISTRICT JUDGE

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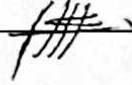
\_\_\_\_\_  
Christopher E. Brown  
J. Ronald Brooke, Jr.  
Federal Trade Commission  
600 Pennsylvania Ave., NW  
Mailstop CC-8528  
Washington, DC 20580  
(202) 326-2825 / cbrown3@ftc.gov  
(202) 326-3484 / jbrooke@ftc.gov  
  
Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION


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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, 14<sup>th</sup> Floor  
Columbus, Ohio 43215  
(614) 752-4730  
Erin.Leahy@OhioAttorneyGeneral.gov  
Travis.Garrison@OhioAttorneyGeneral.gov

Attorneys for Plaintiff  
STATE OF OHIO

\_\_\_\_\_  
Tripletel, Inc. 

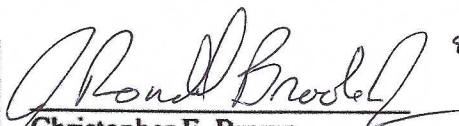
By: *WISSAM JALIL*

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Wissam Jalil 

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



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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, 14<sup>th</sup> 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.

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\_\_\_\_\_  
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, 14<sup>th</sup> 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.