

1 ALDEN F. ABBOTT
General Counsel
2 GREGORY A. ASHE
HELEN CLARK
3 Federal Trade Commission
600 Pennsylvania Avenue NW
4 Washington, DC 20580
Telephone: 202-326-3719 (Ashe)
5 Telephone: 202-326-2273 (Clark)
6 Facsimile: 202-326-3768
Email: gashe@ftc.gov, hclark@ftc.gov

7
8 NICHOLAS A. TRUTANICH
United States Attorney
LINDSAY AGER
9 Assistant United States Attorney
Nevada Bar No. 11985
10 501 Las Vegas Blvd. South, Suite 1100
11 Las Vegas, Nevada 89101
Phone: (702) 388-6336
12 Facsimile: (702) 388-6787
13 Email: Lindsay.ager@usdoj.gov

14 Attorneys for Plaintiff

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 **FEDERAL TRADE COMMISSION,**

18 Plaintiff,

19 v.

20 **LEAD EXPRESS, INC., et al.,**

21 Defendants.
22

Case No. 2:20-cv-00840-JAD-NJK

**ORDER GRANTING
STIPULATION TO ENTER
PRELIMINARY INJUNCTION
AGAINST TAKEHISA NAITO**

[ECF No. 35]

23
24 Plaintiff, the Federal Trade Commission (“FTC”) commenced this civil action on May
25 11, 2020, pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act (“FTC Act”),
26 15 U.S.C. §§ 53(b) and 57b, Section 6(b) of the Telemarketing and Consumer Fraud and Abuse
27 Prevention Act (“Telemarketing Act”), 15 U.S.C. § 6105(b), Section 108(c) of the Truth in

1 Lending Act (“TILA”), 15 U.S.C. § 1607(c), and Section 918(c) of the Electronic Fund Transfer
2 Act (“EFTA”), 15 U.S.C. § 1693o(c). (ECF No. 1.) On May 19, 2020, on motion by the FTC,
3 the Court entered an *ex parte* temporary restraining order (“TRO”) with asset freeze and other
4 equitable relief against Defendants Lead Express, Inc., Camel Coins, Inc., Sea Mirror, Inc., Naito
5 Corp., Kotobuki Marketing, Inc., Ebisu Marketing, Inc., Hotei Marketing, Inc., Daikoku
6 Marketing, Inc., La Posta Tribal Lending Enterprise, Takehisa Naito, and Keishi Ikeda. (ECF
7 No. 13.) Now, the FTC and Defendant Takehisa Naito, by and through their undersigned
8 counsel, have stipulated and agreed to entry of a preliminary injunction (“Order”).

9 **FINDINGS OF FACT**

10 By stipulation of the parties, the Court finds that:

- 11 A. The FTC and Defendant Naito have stipulated and agreed to the entry of this preliminary
12 injunction order without any admission of wrongdoing or violation of law, and without a
13 finding by the Court of law or fact other than stated below.
- 14 B. Defendant Naito waives all rights to seek judicial review or otherwise challenge or contest
15 the validity of this Order.
- 16 C. This Court has jurisdiction over the subject matter of this case, and the FTC asserts that there
17 is good cause to believe that the Court will have jurisdiction over all parties hereto and that
18 venue in this district is proper.
- 19 D. The FTC asserts that there is good cause to believe that Defendant Naito has engaged in and
20 is likely to engage in acts or practices that violate Section 5(a) of the FTC Act, 15 U.S.C.
21 § 45(a), the FTC’s Telemarketing Sales Rule (“TSR”), 16 C.F.R. Part 310, TILA, 15 U.S.C.
22 §§ 1601-1666j, and its implementing Regulation Z, 12 C.F.R. Part 1026, and EFTA, 15
23 U.S.C. §§1693-1693r, and its implementing Regulation E, 12 C.F.R. Part 1005, and that the
24 FTC is therefore likely to prevail on the merits of this action.
- 25 E. The FTC asserts that there is good cause to believe that immediate and irreparable harm will
26 result from Defendant Naito’s ongoing violations of the FTC Act, the TSR, TILA and
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1 Regulation Z, and EFTA and Regulation E unless Defendant Naito is immediately restrained
2 and enjoined by order of this Court.

3 F. The FTC asserts that there is good cause to believe that immediate and irreparable damage to
4 the Court's ability to grant effective final relief for consumers—including monetary
5 restitution, rescission, disgorgement or refunds—will occur from the sale, transfer,
6 destruction or other disposition or concealment by Defendant Naito of his assets or records,
7 unless he is immediately restrained and enjoined by order of this Court.

8 G. The FTC asserts that good cause exists for continuing the asset freeze over Defendant Naito's
9 assets.

10 H. This Order is in the public interest.

11 I. This Court has authority to issue this Order pursuant to Sections 13(b) and 19 of the FTC
12 Act, 15 U.S.C. §§ 53(b) and 57b, Section 6(b) of the Telemarketing Act, 15 U.S.C. §
13 6105(b), Section 108(c) of TILA, 15 U.S.C. § 1607(c), and Section 918(c) of EFTA, 15
14 U.S.C. § 1693o(c); Federal Rule of Civil Procedure 65; and the All Writs Act, 28 U.S.C.
15 § 1651.

16 J. No security is required of any agency of the United States for issuance of a temporary
17 restraining order. Fed. R. Civ. P. 65(c).

18 DEFINITIONS

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

20 A. "**Asset**" means any legal or equitable interest in, right to, or claim to, any property, wherever
21 located and by whomever held.

22 B. "**Consumer**" means any Person.

23 C. "**Corporate Defendants**" means Lead Express, Inc., Camel Coins, Inc., Sea Mirror, Inc.,
24 Naito Corp., Kotobuki Marketing, Inc., Ebisu Marketing, Inc., Hotei Marketing, Inc., and
25 Daikoku Marketing, Inc., and each of their subsidiaries, affiliates, successors, and assigns.
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1 D. **“Defendants”** means the Corporate Defendants, the Tribal Defendant, and the Individual
2 Defendants, individually, collectively, or in any combination.

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

15 F. **“Electronic Data Host”** means any Person or entity in the business of storing, hosting, or
16 otherwise maintaining electronically stored information. This includes, but is not limited to,
17 any entity hosting a website or server, and any entity providing “cloud based” electronic
18 storage.

19 G. **“Individual Defendants”** means Takehisa Naito and Keishi Ikeda, individually, collectively,
20 or in any combination.

21 H. **“Person”** means a natural person, an organization or other legal entity, including a
22 corporation, partnership, sole proprietorship, limited liability company, association,
23 cooperative, or any other group or combination acting as an entity.

24 I. **“Public Health and Safety Event”** means (1) any public health or safety emergency
25 announced or declared by any federal, state, or local governmental authority or (2) the
26 existence of any order, regulation, or action by any federal, state, or local government
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1 authority relating to public health or safety governing or otherwise restricting public or
2 commercial activity, such as a quarantine or stay-at-home order.

- 3 J. **“Tribal Defendant”** means La Posta Tribal Lending Enterprise and any name under which it
4 does business including Harvest Moon Financial, Green Stream Lending, and Gentle Breeze
5 Online.

6 **ORDER**

7 **PROHIBITED BUSINESS ACTIVITIES**

- 8 **I. IT IS THEREFORE ORDERED** that Defendant Naito, his officers, agents, employees, and
9 attorneys, and all other Persons in active concert or participation with them, who receive
10 actual notice of this Order by personal service or otherwise, whether acting directly or
11 indirectly, in connection with the advertising, marketing, promoting, or offering of any loan
12 or other extension of credit, are temporarily restrained and enjoined from:

13 A. misrepresenting or assisting others in misrepresenting, expressly or by implication:

- 14 1. that any Person will withdraw from Consumers’ bank accounts a fixed number of
15 payments to repay Consumers’ loans;
16 2. that any Person will withdraw from Consumers’ bank accounts a fixed total of
17 payments to repay Consumers’ loans;
18 3. that any Person will withdraw from Consumers’ bank accounts payments that consist
19 of both interest and principal repayment; and
20 4. any other fact material to Consumers concerning any loan or other extension of credit,
21 including, but not limited to: (a) closing costs or other fees and how such costs or fees
22 will be assessed, (b) the payment schedule, monthly payment amount(s), any balloon
23 payment, or other payment terms, (c) the interest rate(s), annual percentage rate(s), or
24 finance charge(s), and whether they are fixed or adjustable, (d) the loan amount,
25 credit amount, draw amount, or outstanding balance, (e) the loan term, draw period,
26 or maturity, (f) the amount of cash to be disbursed to the borrower out of the
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1 proceeds, or the amount of cash to be disbursed on behalf of the borrower to any third
2 parties, (g) whether any specified minimum payment amount covers both interest and
3 principal, and whether the credit has or can result in negative amortization, and (h)
4 that the credit does not have a prepayment penalty or whether subsequent refinancing
5 may trigger a prepayment penalty and/or other fees;

- 6 B. if a loan or extension of credit contains an automatic renewal or refinance provision,
7 failing to disclose clearly and conspicuously all material terms and conditions of that
8 provision, including, but not limited to (1) the fact that loan or extension of credit will
9 automatically renew or refinance unless the borrower takes an affirmative action to avoid
10 such renewal or refinance, (2) the date the loan or extension of credit will renew or
11 refinance, and (3) the specific steps the borrower must take to avoid renewal or refinance;
- 12 C. creating or causing to be created, directly or indirectly, a remotely created payment order,
13 including a remotely created check, as payment for any good or service offered or sold
14 through telemarketing;
- 15 D. failing to disclose clearly and conspicuously in writing, in a form Consumers may keep,
16 before extending credit, the following information in a manner reflecting the terms of the
17 legal obligations between the parties: (1) the amount financed, (2) the finance charge, (3)
18 the annual percentage rate, (4) the payment schedule, and (5) the total of payments;
- 19 E. failing to obtain a written authorization signed or similarly authenticated from any Person
20 before debiting such Person's bank account on a recurring basis; and
- 21 F. failing to provide a copy of a written authorization signed or similarly authenticated from
22 any Person before debiting such Person's bank account on a recurring basis.

23 **PROHIBITION ON RELEASE OF CUSTOMER INFORMATION**

24 **II. IT IS FURTHER ORDERED** that Defendant Naito, his officers, agents, employees, and
25 attorneys, and all other Persons in active concert or participation with any of them, who
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1 receive actual notice of this Order, whether acting directly or indirectly, are hereby
2 temporarily restrained and enjoined from:

- 3 A. Selling, renting, leasing, transferring, or otherwise disclosing, the name, address, birth
4 date, telephone number, email address, credit card number, bank account number, Social
5 Security number, or other financial or identifying information of any Person that any
6 Defendant obtained in connection with any activity that pertains to the subject matter of
7 this Order; and
- 8 B. Benefitting from or using the name, address, birth date, telephone number, email address,
9 credit card number, bank account number, Social Security number, or other financial or
10 identifying information of any Person that any Defendant obtained in connection with
11 any activity that pertains to the subject matter of this Order.
- 12 C. Provided, however, that Defendants may disclose such identifying information to a law
13 enforcement agency, to their attorneys as required for their defense, as required by any
14 law, regulation, or court order, or in any filings, pleadings or discovery in this action in
15 the manner required by the Federal Rules of Civil Procedure and by any protective order
16 in the case.

17 **ASSET FREEZE**

18 **III. IT IS FURTHER ORDERED** that, except as set forth in Sections III.F and III.G, Defendant
19 Naito, his officers, agents, employees, and attorneys, and all other Persons in active concert
20 or participation with any of them, who receive actual notice of this Order, whether acting
21 directly or indirectly, are hereby temporarily restrained and enjoined from:

- 22 A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling,
23 concealing, dissipating, disbursing, assigning, relinquishing, spending, withdrawing,
24 granting a lien or security interest or other interest in, or otherwise disposing of any
25 Assets that are:
- 26 1. owned or controlled, directly or indirectly, by any Defendant;
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- 1 2. held, in part or in whole, for the benefit of any Defendant;
- 2 3. in the actual or constructive possession of any Defendant; or
- 3 4. owned or controlled by, in the actual or constructive possession of, or otherwise held
- 4 for the benefit of, any corporation, partnership, asset protection trust, or other entity
- 5 that is directly or indirectly owned, managed or controlled by any Defendant.

6 B. Opening or causing to be opened any safe deposit boxes, commercial mail boxes, or
7 storage facilities titled in the name of any Defendant or subject to access by any
8 Defendant, except as necessary to comply with written requests from the Receiver acting
9 pursuant to its authority under this Order;

10 C. Incurring charges or cash advances on any credit, debit, or ATM card issued in the name,
11 individually or jointly, of any Corporate Defendant or any corporation, partnership, or
12 other entity directly or indirectly owned, managed, or controlled by any Defendant or of
13 which any Defendant is an officer, director, member, or manager. This includes any
14 corporate bankcard or corporate credit card account for which any Defendant is, or was
15 on the date that this Order was signed, an authorized signor; or

16 D. Cashing any checks or depositing any money orders or cash received from Consumers,
17 clients, or customers of any Defendant.

18 E. The Assets affected by this Section shall include: (1) all Assets of Defendants as of the
19 time this Order is entered; and (2) Assets obtained by Defendants after this Order is
20 entered if those Assets are derived from any activity that is the subject of the Complaint
21 in this matter or that is prohibited by this Order. This Section does not prohibit any
22 transfers to the Receiver or repatriation of foreign Assets specifically required by this
23 order.

24 F. Defendant Naito may retain and spend income received from employment unrelated to
25 lending performed after the date of entry of this Order.

1 G. Defendant Naito may retain and spend Assets acquired by loan or gift after the date of
2 entry of this Order only after identifying such Assets to FTC counsel. This sub-section
3 shall not apply to loans or gifts valued at less than \$500.

4 **DUTIES OF ASSET HOLDERS AND OTHER THIRD PARTIES**

5 **IV. IT IS FURTHER ORDERED** that any financial or brokerage institution, Electronic Data
6 Host, credit card processor, payment processor, merchant bank, acquiring bank, independent
7 sales organization, third party processor, payment gateway, insurance company, business
8 entity, or Person who receives actual notice of this Order (by service or otherwise) that (a)
9 has held, controlled, or maintained custody, through an account or otherwise, of any
10 Document on behalf of Defendant Naito or any Asset that has been owned or controlled,
11 directly or indirectly, by Defendant Naito; held, in part or in whole, for the benefit of
12 Defendant Naito; in the actual or constructive possession of Defendant Naito; or owned or
13 controlled by, in the actual or constructive possession of, or otherwise held for the benefit of,
14 any corporation, partnership, asset protection trust, or other entity that is directly or indirectly
15 owned, managed or controlled by Defendant Naito; (b) has held, controlled, or maintained
16 custody, through an account or otherwise, of any Document or Asset associated with credits,
17 debits, or charges made on behalf of Defendant Naito, including reserve funds held by
18 payment processors, credit card processors, merchant banks, acquiring banks, independent
19 sales organizations, third party processors, payment gateways, insurance companies, or other
20 entities; or (c) has extended credit to Defendant Naito, including through a credit card
21 account, shall:

22 A. Hold, preserve, and retain within its control and prohibit the withdrawal, removal,
23 alteration, assignment, transfer, pledge, encumbrance, disbursement, dissipation,
24 relinquishment, conversion, sale, or other disposal of any such Document or Asset, as
25 well as all Documents or other property related to such Assets, except for those identified
26 in Sections III.F and III.G of this Order or except by further order of this Court; *provided*,

1 *however*, that this provision does not prohibit Defendant Naito from incurring charges on
2 a personal credit card established prior to entry of this Order, up to the pre-existing credit
3 limit;

4 B. Deny any Person access to any safe deposit box, commercial mail box, or storage facility
5 that is titled in the name of Defendant Naito, either individually or jointly, or otherwise
6 subject to access by Defendant Naito;

7 C. Provide FTC counsel, within three (3) days of receiving a copy of this Order, a sworn
8 statement setting forth, for each Asset or account covered by this Section:

- 9 1. The identification number of each such account or Asset;
- 10 2. The balance of each such account, or a description of the nature and value of each
11 such Asset as of the close of business on the day on which this Order is served, and, if
12 the account or other Asset has been closed or removed, the date closed or removed,
13 the total funds removed in order to close the account, and the name of the Person or
14 entity to whom such account or other Asset was remitted; and
- 15 3. The identification of any safe deposit box, commercial mail box, or storage facility
16 that is either titled in the name, individually or jointly, of Defendant Naito, or is
17 otherwise subject to access by Defendant Naito; and

18 D. Upon the request of FTC counsel, promptly provide FTC counsel with copies of all
19 records or other Documents pertaining to such account or Asset, including originals or
20 copies of account applications, account statements, signature cards, checks, drafts,
21 deposit tickets, transfers to and from the accounts, including wire transfers and wire
22 transfer instructions, all other debit and credit instruments or slips, currency transaction
23 reports, 1099 forms, and all logs and records pertaining to safe deposit boxes, commercial
24 mail boxes, and storage facilities.

25 E. Provided, however, that this Section does not prohibit repatriation of foreign Assets
26 specifically required by this order.

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FINANCIAL DISCLOSURES

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- 2 **V. IT IS FURTHER ORDERED** that Defendant Naito, within five (5) days following the date
- 3 of entry of this Order, shall prepare and deliver to FTC counsel:
- 4 A. completed financial statements on the forms attached to this Order as **Attachment A**
- 5 (Financial Statement of Individual Defendant); and
- 6 B. completed **Attachment B** (IRS Form 4506, Request for Copy of a Tax Return).

7 **FOREIGN ASSET REPATRIATION**

- 8 **VI. IT IS FURTHER ORDERED** that within five (5) days following the date of entry of this
- 9 Order, Defendant Naito shall:
- 10 A. Provide FTC counsel with a full accounting, verified under oath and accurate as of the
- 11 date of this Order, of all Assets, Documents, and accounts outside of the United States
- 12 which are: (1) titled in the name, individually or jointly, of Defendant Naito; (2) held by
- 13 any Person or entity for the benefit of Defendant Naito or for the benefit of, any
- 14 corporation, partnership, asset protection trust, or other entity that is directly or indirectly
- 15 owned, managed or controlled by Defendant Naito; or (3) under the direct or indirect
- 16 control, whether jointly or singly, of Defendant Naito;
- 17 B. Take all steps necessary to provide FTC counsel access to all Documents and records that
- 18 may be held by third parties located outside of the territorial United States of America,
- 19 including signing the Consent to Release of Financial Records appended to this Order as
- 20 **Attachment C**.
- 21 C. Transfer to the territory of the United States all Documents and Assets located in foreign
- 22 countries which are: (1) titled in the name, individually or jointly, of Defendant Naito; (2)
- 23 held by any Person or entity for the benefit of Defendant Naito or for the benefit of, any
- 24 corporation, partnership, asset protection trust, or other entity that is directly or indirectly
- 25 owned, managed or controlled by Defendant Naito; or (3) under the direct or indirect
- 26 control, whether jointly or singly, of Defendant Naito; *provided, however,* that Defendant
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1 Naito may delay making any such transfer to the extent that a Public Health or Safety
2 Event prevents him from undertaking such transfer safely; and

3 D. The same business day as any repatriation, (1) notify counsel for the FTC of the name
4 and location of the financial institution or other entity that is the recipient of such
5 Documents or Assets; and (2) serve this Order on any such financial institution or other
6 entity.

7 **NON-INTERFERENCE WITH REPATRIATION**

8 **VII. IT IS FURTHER ORDERED** that Defendant Naito, his officers, agents, employees, and
9 attorneys, and all other Persons in active concert or participation with any of them, who
10 receive actual notice of this Order, whether acting directly or indirectly, are hereby
11 temporarily restrained and enjoined from taking any action, directly or indirectly, which may
12 result in the encumbrance or dissipation of foreign Assets, or in the hindrance of the
13 repatriation required by this Order, including, but not limited to:

- 14 A. Sending any communication or engaging in any other act, directly or indirectly, that
15 results in a determination by a foreign trustee or other entity that a “duress” event has
16 occurred under the terms of a foreign trust agreement until such time that all Defendants’
17 Assets have been fully repatriated pursuant to this Order; or
18 B. Notifying any trustee, protector or other agent of any foreign trust or other related entities
19 of either the existence of this Order, or of the fact that repatriation is required pursuant to
20 a court order, until such time that all Defendants’ Assets have been fully repatriated
21 pursuant to this Order.

22 **CONSUMER CREDIT REPORTS**

23 **VIII. IT IS FURTHER ORDERED** that the FTC may obtain credit reports concerning Defendant
24 Naito pursuant to Section 604(a)(1) of the Fair Credit Reporting Act, 15 U.S.C. 1681b(a)(1),
25 and that, upon written request, any credit reporting agency from which such reports are
26 requested shall provide them to the FTC.

PRESERVATION OF RECORDS

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2 **IX. IT IS FURTHER ORDERED** that Defendant Naito, his officers, agents, employees, and
3 attorneys, and all other Persons in active concert or participation with any of them, who
4 receive actual notice of this Order, whether acting directly or indirectly, are hereby
5 temporarily restrained and enjoined from:

- 6 A. Destroying, erasing, falsifying, writing over, mutilating, concealing, altering, transferring,
7 or otherwise disposing of, in any manner, directly or indirectly, Documents that relate to:
8 (1) the business, business practices, Assets, or business or personal finances of any
9 Defendant; (2) the business practices or finances of entities directly or indirectly under
10 the control of any Defendant; or (3) the business practices or finances of entities directly
11 or indirectly under common control with any other Defendant; and
12 B. Failing to create and maintain Documents that, in reasonable detail, accurately, fairly, and
13 completely reflect Defendant Naito’s income, disbursements, transactions, and use of
14 Defendant Naito’s Assets.

15 **REPORT OF NEW BUSINESS ACTIVITY**

16 **X. IT IS FURTHER ORDERED** that Defendant Naito, his officers, agents, employees, and
17 attorneys, and all other Persons in active concert or participation with any of them, who
18 receive actual notice of this Order, whether acting directly or indirectly, are hereby
19 temporarily restrained and enjoined from creating, operating, or exercising any control over
20 any business entity, whether newly formed or previously inactive, including any partnership,
21 limited partnership, joint venture, sole proprietorship, or corporation, without first providing
22 FTC counsel with a written statement disclosing: (1) the name of the business entity; (2) the
23 address and telephone number of the business entity; (3) the names of the business entity’s
24 officers, directors, principals, managers, and employees; and (4) a detailed description of the
25 business entity’s intended activities.
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DISTRIBUTION OF ORDER BY DEFENDANTS

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2 **XI. IT IS FURTHER ORDERED** that Defendant Naito shall immediately provide a copy of
3 this Order to each affiliate, telemarketer, marketer, sales entity, successor, assign, member,
4 officer, director, employee, agent, independent contractor, client, attorney, spouse,
5 subsidiary, division, and representative of Defendant Naito, and shall, within ten (10) days
6 from the date of entry of this Order, and provide the FTC with a sworn statement that this
7 provision of the Order has been satisfied, which statement shall include the names, physical
8 addresses, phone number, and email addresses of each such Person or entity who received a
9 copy of the Order. Furthermore, Defendant Naito shall not take any action that would
10 encourage officers, agents, members, directors, employees, salespersons, independent
11 contractors, attorneys, subsidiaries, affiliates, successors, assigns or other Persons or entities
12 in active concert or participation with them to disregard this Order or believe that they are not
13 bound by its provisions.

14 **SERVICE OF THIS ORDER**

15 **XII. IT IS FURTHER ORDERED** that copies of this Order may be served by any means,
16 including facsimile transmission, electronic mail or other electronic messaging, personal or
17 overnight delivery, U.S. Mail or FedEx, by agents and employees of the FTC, by any law
18 enforcement agency, or by private process server, upon Defendant Naito or any Person
19 (including any financial institution) that may have possession, custody or control of any
20 Asset or Document of Defendant Naito, or that may be subject to any provision of this Order
21 pursuant to Rule 65(d)(2) of the Federal Rules of Civil Procedure. For purposes of this
22 Section, service upon any branch, subsidiary, affiliate or office of any entity shall effect
23 service upon the entire entity.
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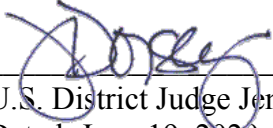
CORRESPONDENCE AND SERVICE ON THE FTC

XIII. IT IS FURTHER ORDERED that, for the purpose of this Order, all correspondence and service of pleadings on the FTC shall be done via email to Gregory A. Ashe at gashe@ftc.gov and Helen Clark at hclark@ftc.gov.

RETENTION OF JURISDICTION

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

IT IS SO ORDERED.



U.S. District Judge Jennifer A. Dorsey
Dated: June 19, 2020