

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,

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

9896988 Canada Inc., a Canadian company,

Globex Telecom, Inc., a Nevada corporation,

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

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

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

EP-19-CV-196-KC

[PROPOSED]
STIPULATED ORDER FOR
PERMANENT INJUNCTION AS TO
DEFENDANTS SAM MADI
AND EDUCARE CENTRE
SERVICES, INC.

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

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

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

Defendants.

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

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The First Amended Complaint charges that the Madi Defendants participated in 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 Madi 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 Madi Defendants admit the facts necessary to establish jurisdiction.

6 4. The Madi 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 Madi Defendants and Plaintiffs waive all rights to appeal or otherwise
10 challenge or contest the validity of this Order.
11

12 **DEFINITIONS**

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

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

16 B. **“Debt Relief Product or Service”** means any product, service, plan or program
17 represented, expressly or by implication, to renegotiate, settle, or in any way alter the
18 terms of payment or other terms of the debt or obligation between a consumer and one or
19 more creditors or debt collectors, including a reduction in the balance, interest rate, or
20 fees owed by a consumer to a creditor or debt collector.
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22 C. **“Defendants”** means Prolink Vision, S.R.L., 9896988 Canada, Inc., Educare
23 Centre Services, Inc., Tripletel, Inc., Mohammad Souheil, Sam Madi, Charles Kharouf,
24 Wissam Jalil, Globex Telecom, Inc., and 9506276 Canada, Inc., individually,
25 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.
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25 H. “**Telemarketer**” means any Person who, in connection with Telemarketing,
26 initiates or receives telephone calls to or from a customer or donor.
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1 I. **“Telemarketing”** means any plan, program, or campaign that is conducted to
2 induce the purchase of goods or services or a charitable contribution by use of one or
3 more telephones.

4 **ORDER**

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

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

12 **IT IS FURTHER ORDERED** that the Madi Defendants are permanently
13 restrained and enjoined from participating in Telemarketing to the United States, whether
14 directly or through an intermediary.
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16 **III. PROHIBITED MISREPRESENTATIONS AND OMISSIONS**

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

V. **EQUITABLE MONETARY JUDGMENT AND SUSPENSION**

IT IS FURTHER ORDERED **that:**

A. Judgment in the amount of **Seven Million Five Hundred Thousand Dollars**

(\$7,500,000.00) is entered in favor of Plaintiffs against the Madi Defendants, jointly and severally, as equitable monetary relief. Full payment of the foregoing judgment amount shall be suspended upon satisfaction of the obligations set forth in Subsection B of this Section, and subject to the conditions set forth in Subsections C-E of this Section.

B. Effective upon entry of this Order, the Madi Defendants shall surrender to Plaintiffs or their representatives, all control, title, dominion, and interest in all assets held in the TD Bank accounts in the name of Educare Centre Services, Inc. ending in X1223 and X1249. The remainder of the judgment is suspended, subject to Subsections C, D, and E, below.

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

1. The Financial Statement of Sam Madi as last updated and signed by Sam Madi on August 14, 2019, including the additional documentation, sent by Madi's former counsel Andrew N. Cove to the Commission via email on August 14 and October 15, 2019, and by Madi to the Commission via email on June 22, 2020; and
2. The Financial Statement of Educare Centre Services, Inc. signed by Sam Madi on August 12, 2019, sent by Madi's former counsel Andrew N. Cove to the Commission via email on August 12, 2019.

1 D. The suspension of the judgment will be lifted as to any Madi Defendant if, upon
2 motion by the Plaintiffs, the Court finds that a Madi Defendant failed to disclose any
3 material asset, materially misstated the value of any asset, or made any other material
4 misstatement or omission in the financial representations identified above.

5 E. If the suspension of the judgment is lifted, the judgment becomes immediately
6 due as to that Madi Defendant in the amount of **Seven Million Five Hundred Thousand**
7 **Dollars (\$7,500,000.00)** specified in Subsection A, above, which the parties stipulate
8 represents the consumer injury alleged in the First Amended Complaint, less any
9 payment previously made pursuant to this Section, plus interest computed from the date
10 of entry of this Order.
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12 VI. ADDITIONAL MONETARY PROVISIONS

13 **IT IS FURTHER ORDERED** that:

14 A. The Madi Defendants relinquish dominion and all legal and equitable right, title,
15 and interest in all assets transferred pursuant to this Order and may not seek the return of
16 any assets.
17

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

22 C. The facts alleged in the First Amended Complaint establish all elements necessary
23 to sustain an action by the Plaintiffs pursuant to Section 523(a)(2)(A) of the Bankruptcy
24 Code, 11 U.S.C. §523(a)(2)(A), and this Order will have collateral estoppel effect for
25 such purposes.
26

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

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

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21 **VII. CUSTOMER INFORMATION**

22 **IT IS FURTHER ORDERED** that the Madi Defendants and their officers,
23 agents, and employees, and all other Persons in active concert or participation with them,
24 who receive actual notice of this Order by personal service or otherwise, are permanently
25 restrained and enjoined from directly or indirectly:
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27 A. Failing to provide sufficient customer information to enable the Commission to
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1 efficiently administer consumer redress. If Plaintiffs' representative requests in writing
2 any information related to redress, Madi Defendant must provide it, in the form
3 prescribed by Plaintiffs' representative, within fourteen (14) days; and

4 B. Disclosing, using, or benefitting from customer information, including the name,
5 address, telephone number, email address, Social Security number, other identifying
6 information, or any data that enables access to a customer's account (including a credit
7 card, bank account, or other financial account), that any Madi Defendant obtained prior to
8 entry of this Order in connection with any activity that pertains to marketing credit card
9 interest rate reduction services; and

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11 C. Failing to destroy such customer information in all forms in their possession,
12 custody, or control within thirty (30) days after receipt of written direction to do so from
13 a representative of the Plaintiffs.
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15 Provided, however, that customer information need not be disposed of, and may
16 be disclosed, to the extent requested by a government agency or required by law,
17 regulation, or court order.

18 VIII. APPOINTMENT OF RECEIVER

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20 **IT IS FURTHER ORDERED** that **Robb Evans & Associates LLC** is appointed
21 as receiver of Educare Centre Services, Inc. with full powers of an equity receiver, for the
22 purpose of taking the necessary steps to wind down Educare Centre Services, Inc. In
23 carrying out these duties, the Receiver shall be the agent of this court, shall be
24 accountable directly to this court, and is authorized and directed to:

25
26 A. Perform all acts necessary to protect, conserve, preserve, and prevent waste or
27 dissipation of Educare Centre Services, Inc. assets, if any, until their sale;
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1 B. Sell Educare Centre Services, Inc.'s assets without further order of the court;

2 C. Enter into agreements in connection with the reasonable and necessary
3 performance of the Receiver's duty to sell Educare Centre Services, Inc.'s assets,
4 including, but not limited to, the retention of assistants, agents, or other professionals to
5 assist in the sale of these Assets;

6 D. Distribute to the FTC, without further order of the court, the funds received from
7 the sale of Educare Centre Services, Inc.'s assets;

8 E. Take any and all steps the Receiver concludes are appropriate to wind down
9 Educare Centre Services, Inc.; and

10 F. Store and secure Educare Centre Services, Inc.'s records, until either entry of a
11 final order against the last remaining Defendant in this proceeding or receipt of written
12 direction to do so from a representative of the FTC.
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15 IX. COOPERATION

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

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1 IT IS FURTHER ORDERED that the Madi Defendants obtain acknowledgments
2 of receipt of this Order:

3 A. Each Madi Defendant, within seven (7) days of entry of this Order, must submit
4 to the Plaintiffs an acknowledgment of receipt of this Order sworn under penalty of
5 perjury.

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

16 C. From each individual or entity to which a Madi Defendant delivered a copy of this
17 Order, that Defendant must obtain, within thirty (30) days, a signed and dated
18 acknowledgment of receipt of this Order.

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22 **XI. COMPLIANCE REPORTING**

23 IT IS FURTHER ORDERED that the Madi Defendants make timely submissions
24 to the Plaintiffs:

25 A. One year after entry of this Order, each Madi Defendant must submit a
26 compliance report, sworn under penalty of perjury:
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1. Each Madi Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Plaintiffs may use to communicate with Madi Defendant; (b) identify all of that Madi Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which Defendant Sam Madi must describe if he knows or should know due to his own involvement); (d) describe in detail whether and how that Madi 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 Sam Madi 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 Madi Defendant must submit a compliance notice, sworn under penalty of perjury, within fourteen (14) days of any change in the following:

1 1. Each Madi Defendant must report any change in: (a) any designated point
2 of contact; or (b) the structure of any Corporate Defendant or any entity that
3 Defendant Madi has any ownership interest in or controls directly or indirectly
4 that may affect compliance obligations arising under this Order, including:
5 creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or
6 affiliate that engages in any acts or practices subject to this Order.
7

8 2. Additionally, Defendant Sam Madi must report any change in: (a) name,
9 including aliases or fictitious name, or residence address; or (b) title or role in any
10 business activity, including any business for which he performs services whether
11 as an employee or otherwise and any entity in which he has any ownership
12 interest, and identify the name, physical address, and any Internet address of the
13 business or entity.
14

15 C. Each Madi Defendant must submit to the Plaintiffs notice of the filing of any
16 bankruptcy petition, insolvency proceeding, or similar proceeding by or against such
17 Defendant within fourteen (14) days of its filing.
18

19 D. Any submission to the Plaintiffs required by this Order to be sworn under penalty
20 of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by
21 concluding: "I declare under penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct. Executed on: _____" and supplying the
23 date, signatory's full name, title (if applicable), and signature.
24

25 E. Unless otherwise directed by a Plaintiffs' representative in writing, all
26 submissions to the Commission pursuant to this Order must be emailed to
27 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate
28

1 Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission,
2 600 Pennsylvania Avenue NW, Washington, DC 20580; the subject line must begin:
3 *FTC et al., v. Educare Centre Services, Inc.* X190039.

4 F. Unless otherwise directed by a Plaintiffs' representative in writing, all
5 submissions to the Ohio Attorney General pursuant to this Order must be mailed to: Ohio
6 Attorney General's Office, Consumer Protection Section, Attn: Compliance Unit, 30 East
7 Broad Street, 14th Floor, Columbus, Ohio 43215; the subject line must begin: *FTC/Ohio*
8 *v. Educare Centre Services, Inc.*
9

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11 **XII. RECORDKEEPING**

12 IT IS FURTHER ORDERED that the Madi Defendants must create certain
13 records for ten (10) years after entry of the Order, and retain each such record for five (5)
14 years. Specifically, Corporate Defendant and Defendant Sam Madi for any business that
15 such Madi Defendant, individually or collectively with any other Defendant, is a majority
16 owner or controls directly or indirectly, must create and retain the following records:
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18 A. Accounting records showing the revenues from all goods or services sold;

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

22 C. Records of all consumer complaints and refund requests, whether received
23 directly or indirectly, such as through a third party, and any response; and
24

25 D. All records necessary to demonstrate full compliance with each provision of this
26 Order, including all submissions to the Plaintiffs.
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XIII. COMPLIANCE MONITORING

1 IT IS FURTHER ORDERED that, for the purpose of monitoring the Madi
2 Defendants' compliance with this Order, including the financial representations upon
3 which part of the judgment was suspended and any failure to transfer any assets as
4 required by this Order:
5

6 A. Within fourteen (14) days of receipt of a written request from a representative of
7 the Plaintiffs, each Madi Defendant must: submit additional compliance reports or other
8 requested information, which must be sworn under penalty of perjury; appear for
9 depositions; and produce documents for inspection and copying. The Plaintiffs are also
10 authorized to obtain discovery, without further leave of court, using any of the procedures
11 prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions),
12 31, 33, 34, 36, 45, and 69.
13

14 B. For matters concerning this Order, the Plaintiffs are authorized to communicate
15 directly with each Madi Defendant. Madi Defendants must permit representatives of the
16 Plaintiffs to interview any employee or other Person affiliated with any Madi Defendant
17 who has agreed to such an interviewd. The Person interviewed may have counsel
18 present.
19

20 C. The Plaintiffs may use all other lawful means, including posing, through its
21 representatives as consumers, suppliers, or other individuals or entities, to Madi
22 Defendants or any individual or entity affiliated with Madi Defendants, without the
23 necessity of identification or prior notice. Nothing in this Order limits the Plaintiffs'
24 lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15
25 U.S.C. §§ 49, 57b-1.
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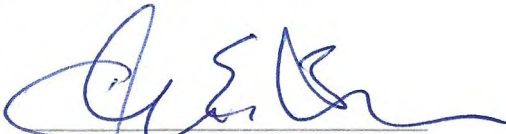
D. Upon written request from a representative of the Plaintiffs, any consumer reporting agency must furnish consumer reports concerning Defendant Sam Madi, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

XIV. RETENTION OF JURISDICTION

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

SO ORDERED, this _____ day of _____, 2020.

KATHLEEN CARDONE
UNITED STATES DISTRICT JUDGE

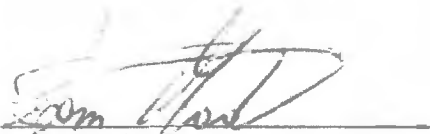


Christopher E. Brown
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Attorneys for Plaintiff
STATE OF OHIO



Educare Centre Services, Inc.

By: SAM MADI



Sam Madi

XIV. RETENTION OF JURISDICTION

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

SO ORDERED, this _____ day of _____, 2020.

KATHLEEN CARDONE
UNITED STATES DISTRICT JUDGE

Erin Leahy 9/21/2020

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Educare Centre Services, Inc.
By:

Sam Madi