

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 17-60907-CIV-MORENO

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

JEREMY LEE MARCUS, *et al.*,

Defendants.

**RECEIVER'S UNOPPOSED MOTION FOR AUTHORITY
TO RETURN CERTAIN CONSUMER FUNDS RECEIVED VIA
BANK CHECK, MONEY ORDER OR PERSONAL CHECK**

Jonathan E. Perlman, “Permanent Receiver” over the Receivership Defendants¹ (the “Receiver”), files this Unopposed Motion for Authority to Return Certain Consumer Funds Received Via Bank Check, Money Order or Personal Check (the “Motion”), and states:

1. On May 8, 2017, the U.S. Federal Trade Commission (“FTC”) and the Office of the Attorney General, State of Florida, Department of Legal Affairs’ (“State of Florida”)

¹ Pursuant to the Preliminary Injunction Order (the “PI”) and Order Expanding the Receivership, the “Receivership Defendants” mean Financial Freedom National, Inc. f/k/a Institute for Financial Freedom, Inc. and Marine Career Institute Sea Frontiers, Inc. also d/b/a 321 Loans, Instahelp America, Inc., Helping America Group, United Financial Support, Breeze Financial Solutions, 321Financial Education, Credit Health Plan, Credit Specialists of America, American Advocacy Alliance, and Associated Administrative Services, 321Loans, Inc., f/k/a 321 Loans, Inc. also d/b/a 321Financial, Inc., Instahelp America, Inc. f/k/a Helping America Team, Inc. also d/b/a Helping America Group, Breeze Financial Solutions, Inc. also d/b/a Credit Health Plan and Credit Maximizing Program, US Legal Club, LLC, Active Debt Solutions, LLC f/k/a Active Debt Solutions, Inc. also d/b/a Guardian Legal Center, Guardian LG, LLC also d/b/a Guardian Legal Group, American Credit Security, LLC f/k/a America Credit Shield, LLC, Paralegal Support Group LLC f/k/a Paralegal Support LLC, Associated Administrative Services, LLC also d/b/a Jobfax, Blue42, LLC, HP Properties Group, Inc., Cockburn & Associate, LLC, JLMJP Pompano, LLC, Discount Marketing USA S.A., Nantucket Cove of Illinois, LLC, Halfpay International, LLC, Omni Management Partners LLC, Halfpay NV, LLC, Viking Management Services, LLC, HP Media, Inc., White Light Media LLC and their divisions, subsidiaries, affiliates, predecessors, successors, assigns, and any fictitious business entities or business names created or used by these entities, or any of them. [ECF No. 21, pg. 5 and ECF No. 102].

(collectively, the “Plaintiffs”), commenced this action by filing a complaint for permanent injunction and other relief (the “Complaint”) and a motion for a temporary restraining order and other equitable relief alleging that Jeremy Lee Marcus, Craig Davis Smith, Yisbet Segrea (collectively, the “Individual Defendants”), the Receivership Defendants and the Relief Defendants, (the Individual Defendants, Receivership Defendants and Relief Defendants² may be referred to herein collectively as the “Defendants”), violated and were likely to violate Sections 5(a), of the FTC Act, 15 U.S.C. § 45(a), the FTC’s Telemarketing Sales Rule “TSR”), 16 C.F.R. Part 310 and the Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”), Chapter 501, Part II, Florida Statutes (2016), Fla. State. § 501.201 et seq. and the Telemarketing Act, 15 U.S.C. §§ 6101-6108. [ECF No. 1, “Compl.”].

2. On May 17, 2017, the Court entered a Preliminary Injunction directing and authorizing the Receiver to, among other things, “[a]ssume full control of the Receivership Defendants,” and “[t]ake exclusive custody, control, and possession of all assets and documents of, or in the possession, custody, or under the control of, the Receivership Defendants, wherever situated.” [ECF No. 21 at p. 17]. The PI appointing the Receiver defined the Receivership as including eleven named “Receivership Defendants,” “and any of their affiliates, subsidiaries, divisions, or sales or customer service operations, wherever located...” [ECF No. 21 at p.17].

3. Section X(B)(2) of the PI states that “the Receiver shall not attempt to collect any

² The “Relief Defendants” are JLMJP Pompano, LLC, 1609 Belmont Place LLC, 16 S H Street Lake Worth, LLC, 17866 Lake Azure Way Boca, LLC, 114 Southwest 2nd Street DBF, LLC, 110 Gloucester St., LLC, 72 SE 6th Ave., LLC, Fast Pace 69 LLC, Strategic Acquisitions Two, LLC, Halfpay International, LLC also d/b/a 16 H.S. Street 12Plex LLC, 311 SE 3rd St., LLC, 412 Bayfront Drive, LLC, 110 Gloucester St., LLC, 72 SE 6th Ave., LLC, 114 SW 2nd Street JM, LLC, 8209 Desmond Drive, LLC, and HLFP, LLC, Halfpay NV LLC also d/b/a Halfpay International LLC, and Nantucket Cove of Illinois, LLC, as well as any successors, assigns, subsidiaries, fictitious business entities, or business names created or used by these entities, or any of them.

amount from a consumer or to allow the Receivership Defendants to continue to debit or otherwise charge a consumer's account, if the Receiver believes the consumer was a victim of the deceptive acts or practices alleged in the Complaint in this matter." [ECF No. 21 at X(B)(2), p.18].

4. Since his appointment, the Receiver has reviewed tens of thousands of documents, conducted numerous interviews and has worked diligently with the Plaintiffs as well as the individual and corporate Receivership Defendants. A detailed account of the work done by the Receiver and his professionals during the initial access period, as well as the Receiver's preliminary findings, is contained in the Receiver's Amended First Interim Report filed on June 9, 2017. [ECF No. 70]. After further investigation, on July 12, 2017, the Receiver filed his Agreed Motion to Expand Receivership [ECF No. 89] and Agreed Motion to Turn Over and Transfer Title to Certain Real Property and Sale Proceeds [ECF No. 90]. On July 31, 2017, this Court entered an Order³ granting the Agreement Motion to Expand Receivership [ECF No. 102].

5. As part of his investigation, the Receiver has been monitoring mail received at the Defendants' headquarters located at 1410 SW 3rd Street, Pompano Beach, FL 33069. Included within the mail are personal checks, bank checks and money orders from consumers.

6. From entry of the PI to date, the Receiver has received 10 bank checks totaling \$1,346.00, 49 money orders totaling \$7,755.58 and 31 personal checks totaling \$4,916.15 (collectively, the "Consumer Payments"). The Consumer Payments are made payable to Receivership Defendants 321 Financial, 321 Loans and Guardian Legal and Additional Receivership Entity White Light Media. The Receiver has not deposited any of the Consumer

³ The Court expanded the receivership over Blue42, LLC, HP Properties Group, Inc., Cockburn & Associate, LLC, JLMJP Pompano, LLC, Discount Marketing USA S.A., Nantucket Cove of Illinois, LLC, Halfpay International, LLC, Omni Management Partners LLC, Halfpay NV, LLC, Viking Management Services, LLC, HP Media, Inc. and White Light Media LLC (collectively, the "Additional Receivership Entities").

Payments due to the prohibition on collecting amounts from consumers, where, as here, it appears the consumers may have been victims of the deceptive acts alleged in the Complaint.

7. By this Motion, the Receiver seeks authority to return personal checks, and to deposit Consumer Payments made via bank check or money order into his dedicated Receivership account, and to immediately issue checks to the consumers in the same amount they sent in. The Receiver also seeks authority to deposit and refund any consumer monies received after the date of this Motion in the same manner. In no instance will the Receiver's return of funds pursuant to this Motion constitute a preference to any consumer. A schedule of Consumer Payments including the consumer's initials, amount and method of payment is attached hereto as Exhibit "A."

8. [The Receiver has conferred with counsel for the FTC and State of Florida as well with counsel for Defendants Jeremy Marcus, JLMJP Pompano, LLC, Halfpay International, LLC, Halfpay NV LLC, and Nantucket Cove of Illinois, LLC, and the Individual Defendants Yisbet Segrea and Craig Smith and they each have no objection to the relief sought herein.]

WHEREFORE, the Receiver, Jonathan E. Perlman, Esq., respectfully requests that this Court enter an order granting this Unopposed Motion for Authority to Return Certain Consumer Funds Received Via Bank Check, Money Order or Personal Check, and for such other and further relief as is just and proper.

Dated: August 4, 2017
Miami, Florida

Respectfully submitted,

GENOVESE JOBLOVE & BATTISTA, P.A.

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Appointed Receiver*

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By: /s/ Gregory M. Garno _____

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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record and entities identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

_____/s/ Gregory M. Garno _____

Gregory M. Garno

SERVICE LIST

Federal Trade Commission v. Jeremy Lee Marcus, et al.
USDC, SD Fla., Case No. 17-cv-60907-MORENO

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Counsel for Defendants Craig Davis Smith and Yisbet Segrea

Schedule of Personal Checks, Bank Checks and Money Orders

Last Name	First Name	Consumer Initials	Check Number	Payment Type	Paid to the Order of:	Amount
		MH	1163	Personal Check	White Light Media	\$ 237.35
		RO	23710971510	Money Order	White Light Media	\$ 299.00
		DE	995522	Bank Check	White Light Media	\$ 50.00
		GH	6167	Personal Check	White Light Media	\$ 99.00
		MS	101393870	Bank Check	White Light Media	\$ 50.00
		RM	17-609001323	Money Order	321 Loans	\$ 160.00
		RM	17-609001997	Money Order	321 Loans	\$ 160.00
		RH	17-585428958	Money Order	White Light Media	\$ 378.00
		AH	17-570299026	Money Order	321 Financial	\$ 203.39
		GF	602	Personal Check	White Light Media	\$ 200.00
		MZ	12381	Personal Check	White Light Media	\$ 59.00
		NL	2453	Personal Check	White Light Media	\$ 50.00
		DR	51284296350	Money Order	White Light Media	\$ 266.26
		DM	1362	Personal Check	White Light Media	\$ 50.00
		AW	3807	Personal Check	White Light Media	\$ 60.00
		TF	434	Personal Check	White Light Media	\$ 376.64
		LM	7100274192	Money Order	321 Financial	\$ 406.93
		JM	17-583818702	Money Order	White Light Media	\$ 49.00
		JM	1615	Personal Check	White Light Media	\$ 50.00
		PR	17-584249765	Money Order	White Light Media	\$ 49.00
		G	261-1755-186	Money Order	White Light Media	\$ 230.00
		NL	2440	Personal Check	White Light Media	\$ 50.00
		TD	20745000897	Money Order	321 Financial	\$ 125.00
		DM	1350	Personal Check	White Light Media	\$ 50.00
		JH	750	Personal Check	White Light Media	\$ 50.00
		AW	3798	Personal Check	White Light Media	\$ 60.00
		CS	2749	Personal Check	White Light Media	\$ 50.00
		ML	2187289179	Money Order	White Light Media	\$ 50.00
		EF	24523745	Bank Check	White Light Media	\$ 315.00
		GF	17-574089899	Money Order	White Light Media	\$ 50.00
		GH	6070	Personal Check	White Light Media	\$ 99.00
		MD	17-591854875	Money Order	White Light Media	\$ 38.00
		KM	20746792507	Money Order	White Light Media	\$ 184.00
		SM	23701432296	Money Order	White Light Media	\$ 50.00
		DR	23703568953	Money Order	White Light Media	\$ 266.26
		TC	17-586688625	Money Order	White Light Media	\$ 119.00
		ML	3565004143	Money Order	Guardian Legal	\$ 149.00
		MH	1158	Personal Check	White Light Media	\$ 237.35
		SL	17-590876437	Money Order	White Light Media	\$ 180.00
		GF	585	Personal Check	White Light Media	\$ 200.00
		AH	17-595144841	Money Order	321 Financial	\$ 203.34
		JM	1613	Personal Check	White Light Media	\$ 50.00
		JC	2182064851	Money Order	White Light Media	\$ 75.39
		MZ	12365	Personal Check	White Light Media	\$ 59.00
		BH	22333957	Bank Check	321 Financial	\$ 170.00
		RM	17-593070148	Money Order	321 Loans	\$ 160.00
		CM	164734399	Money Order	White Light Media	\$ 70.00
		GF	17-573834235	Money Order	White Light Media	\$ 50.00
		NS	1876	Personal Check	White Light Media	\$ 37.95
		DM	17-582844991	Money Order	White Light Media	\$ 234.00
		MS	101393623	Bank Check	White Light Media	\$ 50.00
		TW	2179525591	Money Order	White Light Media	\$ 50.00
		RM	47-035786597	Money Order	White Light Media	\$ 327.00
		VA	20701266757	Money Order	321 Financial	\$ 210.00
		JS	278	Personal Check	Guardian Legal	\$ 685.94
		PR	17-584130035	Money Order	White Light Media	\$ 49.00
		SJ	326	Personal Check	White Light Media	\$ 200.00
		RR	51256418804	Money Order	White Light Media	\$ 299.00
		BR	17-593345670	Money Order	Guardian Legal	\$ 100.00
		MK	108735	Money Order	White Light Media	\$ 186.64
		CS	2727	Personal Check	White Light Media	\$ 50.00
		SD	1.0761E+11	Money Order	Viking Management	\$ 25.00
		RF	1157	Personal Check	321 Financial	\$ 400.00
		JM	17-583818541	Money Order	White Light Media	\$ 49.00
		BH	20664522	Money Order	321 Financial	\$ 100.00
		EN	505656318	Bank Check	Guardian Legal	\$ 149.00
		SM	23701432026	Money Order	White Light Media	\$ 50.00

Schedule of Personal Checks, Bank Checks and Money Orders

Last Name	First Name	Consumer Initials	Check Number	Payment Type	Paid to the Order of:	Amount
		AC	1116	Personal Check	321 Loans	\$ 126.52
		JV	8056077486	Money Order	White Light Media	\$ 250.00
		MF	1256052105	Money Order	Cockburn and Associate	\$ 267.00
		BT	1506	Personal Check	321 Financial	\$ 150.00
		WM	620655	Bank Check	Guardian Legal	\$ 49.00
		CP	1.07698E+11	Money Order	White Light Media	\$ 70.00
		EN	507935713	Bank Check	Guardian Legal	\$ 149.00
		WM	442843	Bank Check	Guardian Legal	\$ 49.00
		BT	1505	Personal Check	321 Financial	\$ 150.00
		SM	5816	Personal Check	White Light Media	\$ 566.76
		TF	416	Personal Check	White Light Media	\$ 376.64
		LM	710026886	Money Order	321 Financial	\$ 406.93
		JLM	1872	Personal Check	White Light Media	\$ 35.00
		BA	23677160815	Money Order	White Light Media	\$ 281.05
		DM	17-609063725	Money Order	White Light Media	\$ 234.00
		ML	2187125470	Money Order	White Light Media	\$ 50.00
		EF	28715138	Bank Check	White Light Media	\$ 315.00
		JC	2182067435	Money Order	White Light Media	\$ 75.39
		GF	17-573542827	Money Order	White Light Media	\$ 50.00
		CM	R107698061251	Money Order	White Light Media	\$ 70.00
		BS	3608	Personal Check	White Light Media	\$ 50.00
		FH	17-561455987	Money Order	White Light Media	\$ 300.00
		SM	23701432757	Money Order	White Light Media	\$ 50.00
						\$ 14,017.73

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 17-60907-CIV-MORENO

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

JEREMY LEE MARCUS, *et al.*,

Defendants.

**ORDER GRANTING RECEIVER'S UNOPPOSED MOTION FOR
AUTHORITY TO RETURN CERTAIN CONSUMER FUNDS RECEIVED VIA BANK
CHECK, MONEY ORDER OR PERSONAL CHECK**

THIS CAUSE comes before the Court on Jonathan E. Perlman, “Permanent Receiver” over the Receivership Defendants¹ (the “Receiver”), Unopposed Motion for Authority to Return Certain Consumer Funds Via Bank Check, Money Order or Personal Check (the “Motion”) [ECF No. ___], and the Court, having reviewed the Motion and finding good cause to grant the requested relief:

¹ Pursuant to the Preliminary Injunction Order (the “PI”) and Order Expanding the Receivership, the “Receivership Defendants” mean Financial Freedom National, Inc. f/k/a Institute for Financial Freedom, Inc. and Marine Career Institute Sea Frontiers, Inc. also d/b/a 321 Loans, Instahelp America, Inc., Helping America Group, United Financial Support, Breeze Financial Solutions, 321Financial Education, Credit Health Plan, Credit Specialists of America, American Advocacy Alliance, and Associated Administrative Services, 321Loans, Inc., f/k/a 321 Loans, Inc. also d/b/a 321Financial, Inc., Instahelp America, Inc. f/k/a Helping America Team, Inc. also d/b/a Helping America Group, Breeze Financial Solutions, Inc. also d/b/a Credit Health Plan and Credit Maximizing Program, US Legal Club, LLC, Active Debt Solutions, LLC f/k/a Active Debt Solutions, Inc. also d/b/a Guardian Legal Center, Guardian LG, LLC also d/b/a Guardian Legal Group, American Credit Security, LLC f/k/a America Credit Shield, LLC, Paralegal Support Group LLC f/k/a Paralegal Support LLC, Associated Administrative Services, LLC also d/b/a Jobfax, Blue42, LLC, HP Properties Group, Inc., Cockburn & Associate, LLC, JLMJP Pompano, LLC, Discount Marketing USA S.A., Nantucket Cove of Illinois, LLC, Halfpay International, LLC, Omni Management Partners LLC, Halfpay NV, LLC, Viking Management Services, LLC, HP Media, Inc., White Light Media LLC and their divisions, subsidiaries, affiliates, predecessors, successors, assigns, and any fictitious business entities or business names created or used by these entities, or any of them. [ECF No. 21, pg. 5 and ECF No. 102].

ORDERS AND ADJUDGES

1. The Motion is GRANTED.
2. The Receiver is authorized to deposit the Consumer Payments made via bank check or money order into his dedicated receivership account and immediately refund such monies to each consumer.
3. The Receiver is authorized to return the Consumer Payments made via personal check to each consumer.
4. The Receiver is authorized to deposit any bank checks or money orders received from consumers after filing of the Motion and refund such monies to consumers in the same manner.
5. The Receiver is authorized to return any personal checks received from consumers after the filing of the Motion in the same manner.

DONE AND ORDERED in Chambers at Miami, Florida this ____ day of August, 2017.

FEDERICO A. MORENO
UNITED STATES DISTRICT JUDGE

Copies provided to Counsel of Record.

Serres, Ellen

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U.S. District Court

Southern District of Florida

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Case Name: Federal Trade Commission et al v. Marcus et al

Case Number: [0:17-cv-60907-FAM](#)

Filer: Jonathan E. Perlman

Document Number: [103](#)

Docket Text:

Unopposed MOTION for Authority to Return Certain Consumer Funds Received Via Bank Check, Money Order or Personal Check by Jonathan E. Perlman. (Attachments: # (1) Exhibit A, # (2) Text of Proposed Order)(Garno, Gregory)

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Document description:Main Document

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