

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SAMUEL JAMES SMITH, also d/b/a Weblio,  
a/k/a Weblio Squeeze,

ROBERT WILLIAM SHAFER, also d/b/a Shafe  
MM&I, a/k/a MMI,

CHARLES JOSEPH GARIS, JR., individually  
and as an owner, officer, and/or manager of  
Business Revolution Group Inc., and also d/b/a  
Joe Gaines, and

---

C. T

G. There is good cause to believe that immediate and irreparable harm will result from Defendant Smith's ongoing violations of the FTC Act and the TSR unless Defendant Smith is restrained and enjoined by order of this Court.

H. There is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief for consumers, including monetary restitution, rescission, or refunds will occur from the sale, transfer, destruction, or other disposition or concealment by Defendant Smith of his Assets or records, unless Defendant Smith is restrained and enjoined by order of this Court.

I. Good cause exists for continuing to freeze Defendant Smith's Assets.

J. This Order is in the public interest.

K. This Court has authority to issue this Order pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b; Federal Rule of Civil Procedure 65; and the All Writs Act, 28 U.S.C. § 1651.

L. The FTC is an independent agency of the United States, and no security is required of any agency of the United States in connection with issuance of a preliminary injunction. Fed. R. Civ. P. 65(c).

#### DEFINITIONS

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

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

B. "Corporate Defendant" means Business Revolution Group Inc., also d/b/a Joe Gaires, and each of its subsidiaries, affiliates, successors, and assigns.





2. Any other fact material to consumers concerning any good or service, such as: the total costs; any material restrictions, limitations, or conditions; or





A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, relinquishing, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any Assets that are:

1. owned or controlled, directly or indirectly by any Defendant.





Section, including originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers from the accounts, including wire transfers and wire transfer instructions, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and

3. the name, address, telephone number, email address, and contact person (when applicable) for each entity or person who (i) supplied, manufactured, formulated, or created each good or service identified in response to Section VI.C of this Order; (ii) marketed, advertised, sold, or distributed each good or service identified in response to Section VI.C.1 of this Order; (iii) received payment for disseminating or publishing, or assisting in the dissemination or publication, of advertisements for each good or service identified Section VI.C.1 of this Order, including those advertisements disseminated through telemarketing; and (iv) paid, directly or indirectly, for each good or service identified in response to Section VI.C.1 of this Order, including the amount paid by the person or entity and the name of the good or service purchased.

#### VII. FOREIGN ASSET REPATRIATION

IT IS FURTHER ORDERED, to the extent not done in compliance with the Temporary Restraining Order issued in this action on December 6, 2023 (ECF No. 6), that within three (3) days following the service of this Order Defendant Smith shall

A. Provide Plaintiff's counsel with a full accounting, verified under oath and accurate as of the date of this Order, of all Assets, documents, and accounts outside of the United States which are: (1) titled in the name, individually or jointly, of Defendant Smith; (2) held by any person or entity for the benefit of Defendant Smith or for the benefit of any

B. Take all steps necessary to provide Plaintiff's counsel access to documents and records that may be held by third parties located outside of the territorial United States of

B. Notifying any trustee, protector or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a court order until such time that Defendant Smith's Assets have been fully repatriated pursuant to this Order.

#### IX. CONSUMER CREDIT REPORTS

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

#### X. PRESERVATION OF RECORDS

IT IS FURTHER ORDERED that Defendant Smith, his agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, are hereby restrained and enjoined from:

A.









XV. CORRESPONDENCE AND SERVICE ON PLAINTIFF

IT IS FURTHER ORDERED 3 (Tw 4.17 0 Td ( [(th-2.3a1 -2t th-2.3is1 -2 O8.81(d)7 ( (t)- d4 (s1

---