UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEDERAL TRADE COMMISSION, Plaintiff, v. CAREER EDUCATION CORPORATION, et al., Defendants.	Case No. 1:19-cv-5739 Judge Elaine E. Bucklo Magistrate Judge Jeffrey Cummings

JOINT MOTION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT

Plaintiff, the Federal Trade Commission ("FTC"), and Defendants, Career Education Corporation, American InterContinental University, Inc., AIU Online, LLC, Marlin Acquisition Corp., Colorado Technical University, Inc., and Colorado Tech., Inc (collectively "CEC"), jointly move this Court for entry of the Stipulated Order for Permanent Injunction and Monetary Judgment ("Stipulated Final Order") reached through settlement negotiations between the parties, which would resolve this case. The parties request entry of the Stipulated Final Order pursuant to Sections 13(b), 19(a)(1) and (b) (authorizing relief, including "such relief as the court finds necessary to redress injury to consumers" for violations of any Commission Rule respecting unfair or deceptive practices), and 16(a)(1) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b), 57b, and 56(a)(1), and the Telemarketing and Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. § 6101 et seq. In support of this motion, the FTC and CEC state as follows:

1. The FTC filed its Complaint for Permanent Injunction and Other Equitable Relief on August 23, 2019, alleging that CEC had violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), Sections 310.3 and 310.4 of the Telemarketing Sales Rule, 16 C.F.R. §§ 310.3, 310.4, and other federal laws. [Dkt. 1]

2. The Stipulated Final Order has been signed by CEC and its counsel. The Stipulated Final Order also has been approved by the FTC's Commissioners and signed by counsel for the FTC.

WHEREFORE, Plaintiff FTC and CEC respectfully request that the Court enter the Stipulated Final Order.

Respectfully submitted,

August 27, 2019

/s/ Leah Frazier
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CERTIFICATE OF SERVICE

I, Leah Frazier, an attorney, hereby certify that on August 27, 2019, I caused to be served true copies of the foregoing Joint Motion for Entry of Stipulated Order for Permanent Injunction and Monetary Order through the CM/ECF System and, with the written consent of counsel, by e-mail on counsel for Defendants Career Education Corp., American InterContinental University, Inc., AIU Online, LLC, Marlin Acquisition Corp., Colorado Tech., Inc., and Colorado Technical University, Inc.

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