UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FEDERAL TRADE COMMISSION, Plaintiff, v. HIGHER GOALS MARKETING LLC, SUNSHINE FREEDOM SERVICES, LLC, BRANDUN L. ANDERSON, LEA BROWNELL, MELISSA M. DEESE, GERALD D. STARR, JR., TRAVIS L. TEEL and WAYNE T. NORRIS Defendants.	Case No. 6:17-cv-2048-ORL-41-KRS (E-Filed December 22, 2017)

DEFENDANT WAYNE T. NORRIS' ANSWER AND DEFENSES TO PLAINTIFFS' COMPLAINT FOR PERMANENT INJUNTION AND OTHER RELIEF

Defendant Wayne T. Norris ("NORRIS"), by and through undersigned counsel, hereby files this, his Answer to Plaintiffs' Complaint for Permanent Injunction and other Relief ("Complaint") as follows:

1. NORRIS admits the allegations contained in paragraphs 1, 11-14, 51-52 and 84 of the Complaint.
2. Paragraphs 2-8, 53-58 and 72-80 are specifically directed at defendants other than NORRIS and therefore make allegations to which no response is required by NORRIS. In the alternative, NORRIS is without sufficient knowledge or information

to fully respond to, and therefore denies, the allegations contained in paragraphs 2-8, 53-58 and 72-80 of the Complaint.

3. With respect to paragraph 9 of the Complaint, NORRIS admits that he worked for at least one of the defendants in the case styled *FTC v. Life Management Services of Orange County, LLC, et. al.* The remainder of paragraph 9 is denied.
4. NORRIS denies the allegations contained in paragraphs 10, 45-50 and 81-82 of the Complaint.
5. NORRIS is without sufficient knowledge or information to fully respond to, and therefore denies, the allegations contained in paragraphs 15-21, 23-44 and 83 of the Complaint.
6. With respect to paragraph 22 of the Complaint, NORRIS admits that he resides in this district. The remainder of paragraph 22 is denied.
7. Paragraphs 59-71 and 84-85 of the Complaint assert legal conclusions to which no response is required.
8. All other allegations of the Complaint to which NORRIS has not otherwise responded are denied.

FIRST AFFIRMATIVE DEFENSE

The Complaint, and each cause of action asserted against NORRIS therein, fails to state facts sufficient against NORRIS to constitute a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

NORRIS neither participated in nor had the authority to control the allegedly unfair or deceptive acts or practices that are the subject of this action.

THIRD AFFIRMATIVE DEFENSE

Damages, if any, are attributable to the conduct of persons other than NORRIS, and not to any action or activity of NORRIS.

Respectfully submitted, this 22nd day of December 2017.

COVE LAW, P.A.

_/s/ Andrew N. Cove_____
Andrew N. Cove
Florida Bar No: 562122
225 South 21st Avenue
Hollywood, Florida 33020
Attorneys for Wayne Norris
Tel: (954) 921-1121
Fax: (954) 921-1621
anc@covelaw.com

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2017, I served a true and correct copy of the foregoing by filing it with the Court's CM/ECF system, email, or U.S. Mail on the counsel or parties of record listed in the following Service List.

_/s/ Andrew N. Cove_____

SERVICE LIST

Tejasvi M. Srimushnam, Esq.
Federal Trade Commission
600 Pennsylvania Ave. NW
Mail Stop H-286
Washington, DC 20580
Counsel for Plaintiff Federal Trade Commission

Joshua A. Doan, Esq.
Federal Trade Commission
600 Pennsylvania Ave. NW
Mail Stop H-286
Washington, DC 20580
Counsel for Plaintiff Federal Trade Commission

Mario Ceballos, Esq.
The Ceballos Law Firm, P.A.
638 Broadway Avenue, Orlando, Florida 32803-4540
Email: mceballos@ceballos-law.com
Counsel for Defendants Gerald D. Starr, Jr., Sunshine Freedom Services LLC

Defendant Brandun Anderson, individually, and as Registered Agent for
Defendant Higher Goals Marketing LLC
3716 Prairie Reserve Boulevard
Orlando, Florida 32824
Email: brand.anderson87@gmail.com

Defendant Lea A. Brownell
550 Hibiscus Road, Casselberry, FL 32707
Email: brownie16259@me.com

Defendant Melissa M. Deese
16543 Cedar Run Drive
Orlando, Florida 32828
Email: melissamaeward@gmail.com

Defendant Travis L. Teel
10365 Riva Ridge Trail
Orlando, Florida 32817
Email: travis.teel@icloud.com