UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FEDERAL TRADE COMMISSION, Plaintiff, v. TRAFFIC JAM EVENTS, LLC, a limited liability company, and DAVID J. JEANSONNE II, individually and as an officer of TRAFFIC JAM EVENTS, LLC, Defendants.	**Civil Action No. 2:20-cv-1740** **Judge: Wendy B. Vitter** **Magistrate: Dana Douglas**

MOTION FOR A TEMPORARY RESTRAINING ORDER, AND OTHER EQUITABLE RELIEF, AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, the Federal Trade Commission ("FTC") moves for a temporary restraining order ("TRO"), and other equitable relief, and an order to show cause why a preliminary injunction should not issue. In support of its motion, the FTC submits the accompanying memorandum, certification, declarations, and supporting attachments and exhibits, and states as follows:

1. The FTC brings this action to stop Defendants Traffic Jam Events, LLC and David J. Jeansonne II from deceptively using the promise of stimulus relief provided by the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act"), P.L. 116-136, to lure consumers to sales events at auto dealerships. Through its advertising and direct-mail marketing, Defendants have been misrepresenting that (i) their mailers concern official COVID-19 stimulus information, (ii) consumers will receive stimulus relief, including checks, by visiting a designated site, and (iii) the mailers involve a stimulus program associated with,

or approved by, the government. In fact, Defendants are not providing official COVID-19 stimulus information or relief and are not affiliated, or approved by the government, or by any government agency.

2. These acts and practices violate Section 5(a) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 45(a).

3. The FTC therefore seeks a TRO:

   a. Temporarily restraining Defendants from misrepresenting any material fact, including but not limited to, that any Defendant is providing COVID-19 stimulus information or relief and that any Defendant is affiliated or approved by the government, or by any government agency;

   b. Temporarily restraining and enjoining Defendants from releasing certain consumer information;

   c. Restraining and enjoining Defendants and certain third parties from destroying or concealing documents;

   d. Requiring Defendants to show cause why this Court should not issue a preliminary injunction extending such temporary relief pending an adjudication on the merits; and

   e. Providing for other equitable relief.

WHEREFORE, the FTC respectfully requests that this Court grant this motion by issuing a TRO entering the proposed relief.

[SIGNATURE PAGE FOLLOWS]

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WHEREFORE, the FTC respectfully requests that this Court grant this motion by issuing a TRO entering the proposed relief.

[SIGNATURE PAGE FOLLOWS]

Dated: June 16, 2020

Respectfully submitted,

/s/ Sanya Shahrasbi
SANYA SHAHRASBI (D.C. Bar No. 1671001)
THOMAS J. WIDOR (D.C. Bar No. 490184)

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2020, copies of the foregoing will be served via personal service or otherwise, concurrent with the service of the summons and the complaint in this case. Counsel for Plaintiff Federal Trade Commission will file a supplemental certificate of service to identify the manner in which service was effected.

Traffic Jam Events, LLC
2232 Idaho Avenue
Kenner, LA 70062

David J. Jeansonne II
821 Transcontinental Drive
Metairie, LA 70001

Defendants

/s/ Thomas J. Widor
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D.C. Bar No. 490184
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