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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

QYK BRANDS LLC d/b/a Glowyy; et al,

Defendants

Case No. 8:20-cv-01431-PSG-KES

DECLARATION OF RAKESH TAMMABATTULA

Magistrate: Hon. Karen E. Scott
District: Hon. Philip S. Gutierrez
Courtroom: 6A

I, RAKESH TAMMABATULLA, do hereby declare and state as follows:

1. I have personal knowledge of the following facts, and if called upon would testify to them.
2. It has been 4 ½ years since the events that led to the FTC's enforcement action against me and the other defendants.

3. I understand that the Court has ordered that a consumer redress fund for about $3.1 million be established.
4. I am truly sorry for any damage or injury that I have caused to the public and would very much like to fulfill my obligation to fund the redress fund.
5. The problem is that my only source of income is through my company, QYK Brands, LLC ("QYK").
6. In the summer of 2020, QYK changed its model from a direct sales company to consumers to a manufacturer of products for government contracts.
7. Given the present state of the injunction, QYK is unable to provide basic health related products to such agencies as the Veteran's Administration. This includes such things as foot ointment for nail infections or even band aides. None of this had anything to do with the events in this matter, and they are products that are needed by the agencies for its constituents such as veterans.
8. Because QYK is unable to provide these products, neither QYK nor I are able to raise the funds for the redress funds. If the injunction were altered to exempt QYK from the permit ban of all products that treat or cure disease or infection, then I would be in a position to raise the funds to pay the redress funds.
9. Defendant Jacqueline Nguyen has no interest or involvement with QYK and it is solely operated by my brother and I.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of October 2024 at Garden Grove, California.

__/s/ *Rakesh Tammabattula*_

Rakesh Tammabattula