UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

RagingBull.com, LLC, *et al.*,

Defendants.

Case No. 20 Civ. 3538-GLR

SECOND DECLARATION OF KYLE W. DENNIS

I, KYLE W. DENNIS, declare as follows:

1. I have reviewed Attachment B to Reeve Tyndall's Declaration (ECF No. 119-3), which the FTC filed in support of its opposition to the Defendants' Motion for Defense Costs.

2. Attachment B appears to be an e-mail from "confluence@raging-bull.atlassian.net" to "kyle@ragingbull.com." Although I am not fully familiar with it, I understand Confluence to be a project management software tool that Raging Bull's technical team used to set up tasks, delegate responsibilities for those tasks, and the like. The e-mail says that "Ray Trang created a [Confluence] page." I understand Ray Trang to be a software developer that was involved in the computer coding for Raging Bull's website and app, and who worked as part of Raging Bull's development team.

3. I was not a part of and I did not supervise the development team. I believe that members of the development team would routinely copy people involved in the Raging Bull brand on Confluence pages when they set up a task. Confluence would then automatically send an e-mail like Attachment B to people involved in the brand – in my case, the Biotech Breakouts brand.

4. As a result, I received many Confluence e-mails similar in form to Attachment B. With very few exceptions, I did not open those e-mails because they had nothing to do with my job responsibilities.

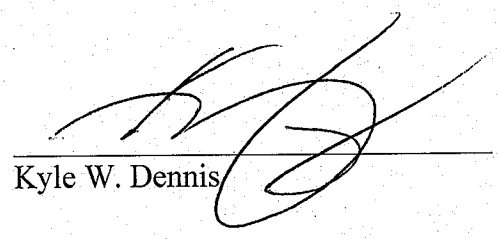
5. In particular, I did not open the e-mail in Attachment B. I have attached to this declaration a screenshot of the kyle@ragingbull.com inbox, which shows that this specific e-mail was un-opened, and which also illustrates that I received numerous other Confluence e-mails that are likely unopened.

6. Changes to customer service terms and changes to the functionality of the Raging Bull website or app simply have nothing to do with my job responsibilities.

7. I understand that the FTC has identified a $300,000 transfer made out of a joint checking account I held on December 7, 2020. I did not make that transfer.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: January 14, 2021



Kyle W. Dennis

Exhibit A

Ray, Confluence 2	Inbox **[Confluence] Raging Bull Wiki > Update Subscription Optout Options** - There are 2 new edits on this page	1/6/20
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Single Click Email Opt IN** - There's 1 new edit on this page	1/4/20
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Interactive Offers Info page** - There's 1 new edit on this page	1/3/20
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Interactive Offers Info page** - Jason Pell created a page	12/31/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Free List Welcome Lists** - There are 2 new edits on this page	12/31/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Free List Welcome Lists** - There's 1 new edit on this page	12/17/19
Jason Pell (Conflue.	Inbox [Confluence] Raging Bull Wiki > Single Click Opt In Project Proposal - There's 1 new edit on this page	12/17/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > New Products 2019** - Jason Pell created a page	12/17/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Trade for life** - There's 1 new edit on this page	12/16/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > WP All Import software 2019 December** - Jason Pell created a page	12/16/19
Guillaume Bourdages.	Inbox **[Confluence] Raging Bull Wiki > How to import Emails and Tag then in Isoft** - There's 1 new edit on this page	12/13/19
Guillaume Bourdages.	Inbox **[Confluence] Raging Bull Wiki > How to make the VSL buttons shows up on second visit** - Guillaume Bourdages created a page	12/12/19
Guillaume Bourdages. 2	Inbox **[Confluence] Raging Bull Wiki > How to import Emails and Tag then in Isoft** - There's 1 new edit on this page avatar_8e6c43d...	12/12/19
Will, Jason 2	Inbox [Confluence] Raging Bull Wiki > End of Year 2019 Projects and Hot Topics - There's 1 new comment on this page avatar_890e928...	12/12/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Single Click Email Opt IN** - There's 1 new edit on this page	12/9/19
Jason Pell (Conflue.	Inbox **[Confluence] Raging Bull Wiki > Trade for life** - There's 1 new edit on this page	12/9/19
Jason, Guillaume 4	Inbox **[Confluence] Raging Bull Wiki > End of Year 2019 Projects and Hot Topics** - There's 1 new edit on this page avatar_890e928... avatar_8e6c43d...	12/9/19