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

FEDERAL TRADE COMMISSION, Plaintiff, v. FRANK ROMERO, individually and also d/b/a Trend Deploy, Trendeploy, trendeploy, trendeploy.com, Frank Romero Advertising, and Uvenux, Defendant,	CASE NO. 5:21-cv-343

JOINT MOTION FOR ENTRY OF STIPULATED ORDER MODIFYING ASSET FREEZE AND APPOINTING A LIQUIDATOR

The Federal Trade Commission ("FTC" or "Commission") and Defendant Frank Romero ("Romero") jointly move the Court to enter a stipulated order modifying the asset freeze contained in the Court's preliminary injunction, Doc. 104, and appointing a liquidator. The proposed order would modify the asset freeze to permit Romero to turn over to the FTC approximately $115,000 in bank accounts held in the name of ARPA Real Estate LLC ("ARPA") and Kayak Rental Silver Springs LLC. It would also modify the asset freeze to permit Romero, ARPA, and Romero's wife, Patricia Martinez, to turn over to a Court-appointed liquidator three parcels of real property (i.e., houses located at 17 Sapphire Road in Ocala, 78 Hemlock Drive in Ocala, and 9554 Bahia Road in Ocala). Finally, the proposed

order would permit the liquidator to take possession of and then sell the real property in a commercially-reasonable manner and remit to the FTC the proceeds after payment of her fees and expenses.

The parties propose appointing Maria Yip as the liquidator. Ms. Yip is the founder and managing partner of Yip Associates, a firm specializing in forensic accounting, financial investigations, receiverships, and bankruptcy-related matters. PX 1 at 9. She has significant experience both as a state and federal receiver and as a Chapter 7 and Chapter 11 bankruptcy trustee. PX 1 at 4. Ms. Yip would charge $325 per hour for this case and would supervise the sale of the properties by a real estate broker. PX 1 at 5.

Although the proposed order does not settle all the claims between the FTC and Romero,[1] the relief it contemplates will allow Romero to partially satisfy the FTC's judgment. *See* Doc. 63 at 18 (imposing $989,483.69 judgment).[2] Furthermore, the proposed order should result in the turnover of significant funds to the FTC, which it will use to provide redress to consumers Romero harmed.

[1] The FTC recently filed a lawsuit against Romero, Martinez, and ARPA seeking the unwinding of various fraudulent transfers and the imposition of various declaratory judgments. *See FTC v. Romero et al.*, Case No. 5:24-cv-00473 (M.D. Fla) (filed September 3, 2024). If the Court enters the proposed stipulated order, the FTC would promptly seek leave to amend its complaint in that matter to excise moot claims.

[2] As of September 18, 2024, the FTC has collected $119,585.35 from writs of garnishment; with post-judgment interest, Romero still owes $933,448.32 under the judgment.

For the foregoing reasons, the parties jointly request the Court enter the proposed stipulated order modifying the asset freeze and appointing a liquidator.

LOCAL RULE 3.01(G) CERTIFICATION

The parties have conferred on this motion and jointly seek the relief sought herein.

Dated this 25th day of September, 2024.

Respectfully submitted,

/s/ Christopher J. Erickson
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

/s/ Frank Romero
Frank Romero
17 Sapphire Road
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CERTIFICATE OF SERVICE

I hereby certify that, on September 25, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I have also sent a copy of this filing to Frank Romero by email at adriel.romero2008@gmail.com and by U.S. Mail to him at the following address:

Frank Romero
17 Sapphire Road
Ocala, FL 34472

/s/ Christopher J. Erickson
Christopher J. Erickson