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FILED
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9/9/24
CENTRAL DISTRICT OF CALIFORNIA
BY: MRV DEPUTY

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission,
Plaintiff,
v.
Ascend Capventures Inc., also doing business as Ascend Ecom LLC; Ascend Ecomm LLC; ACV; ACV Partners; Accelerated Ecommerce Ventures; Ascend Distribution LLC; Ethix Capital; and ACV Nexus, a Wyoming close corporation profit corporation,
Ascend Ecommerce Inc., also doing business as Ascend Ecom LLC, a Wyoming close corporation profit corporation,
Ascend Administration Inc., a California general stock corporation,
Ascend Ecom LLC, a Wyoming limited liability company,
Ascend Distribution LLC, a Texas limited liability company,
William Michael Basta, individually and as officer and/or owner of Ascend Ecom

No. 2:24-cv-07660SPG(JPRx)

FILED UNDER SEAL

PLAINTIFF FEDERAL TRADE COMMISSION'S EXHIBITS

VOLUME X

Exhibits 28-33

Pages 2632 to 3054

LLC, Ascend Capventures Inc., Ascend Ecommerce Inc., Ascend Administration Inc., and Ascend Distribution LLC, and **Jeremy Kenneth Leung**, individually and as an officer and/or owner of Ascend Ecom LLC, Ascend Capventures Inc., Ascend Ecommerce Inc., Ascend Administration Inc., and Ascend Distribution LLC,

Defendants.

Volume X – Exhibit List

Ex.	Description	Beginning Page #	Ending Page #
28	Declaration of Elizabeth Anne Miles	2632	2651
29	Declaration of Navid Massarat	2652	2698
30	Declaration of Tyler Broome	2699	2727
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32	Declaration of MariaRosa Cartolano	2744	2779
33	Declaration of Blanca Graham Cordova	2780	3054

Exhibit 28

DECLARATION OF ELIZABETH ANNE MILES

My name is Elizabeth Anne Miles. I have personal knowledge of the facts set forth below and am competent to testify as follows:

1. I am a United States citizen and am over 18 years of age. I am employed by the Federal Trade Commission ("FTC") as a Data Analyst in the Division of Consumer Response and Operations, Bureau of Consumer Protection. I have worked at the FTC since December 2005.

2. My formal education includes a Bachelor of Arts degree in Economics and Spanish, a graduate certificate in Geographic Information Sciences, and college courses in Structured Query Language ("SQL") as non-degree career training.

3. In the course of my duties, I was assigned to the investigation of Ascend Capventures Inc., Ascend Ecommerce Inc., Ascend Administration Inc., Ascend Ecom LLC, and Ascend Distribution LLC (collectively, "Ascend").

4. During the course of this investigation, I reviewed information provided by Amazon in response to the FTC's request for account information for specific seller accounts. Amazon provided, among other things, store registration dates, aggregated sales, marketplace status, and product quality complaints. The data is organized by merchant_customer_id, which is a unique identifier for a seller. A seller can operate in more than one marketplace or geographic region at once, and sometimes the data was broken out into this more granular level.

5. Amazon provided information for 20 sellers in "Supplemental Ascend Data Packet - Client Worksheet 2024-05-28.xlsx" and 54 sellers in "FTC_Ascend_EXF1001601_Supplemental_Request_Data_Packet_2024_07_03.xlsx."

6. Amazon provided marketplace status in the "Seller Account Overview" tabs of these files in the seller_marketplace_status column. Amazon stated in an email that "NormalStatus" means the seller is in good standing and

able to conduct business. Sellers in "PendingValidCCStatus" can accrue sales, but cannot receive disbursements or make changes to listings, inventory, shipments, or advertisements. "BlockedStatus" and "TerminatedStatus" mean the seller is deactivated and unable to conduct business in a specific marketplace or in any Amazon marketplaces. Status can be different for each of a seller's marketplaces. There are 38 sellers (51%) that are unable to conduct business on Amazon because they have no marketplaces in "NormalStatus" or "PendingValidCCStatus."

7. Amazon provided monthly aggregate sales in the "Aggregated Sales" tab in both files. "Supplemental Ascend Data Packet - Client Worksheet 2024-05-28.xlsx" includes sales from January 2020 to May 2024; and "FTC_Ascend_EXF1001601_Supplemental_Request_Data_Packet_2024_07_03.xlsx" includes sales from January 2020 to June 2024. Amazon stated in an email that refunded and canceled orders are not included in these tabs. Because some marketplaces are outside the United States, there are aggregate sales in US dollars, Canadian dollars, and Mexican pesos. I used monthly spot exchange rates[1] to convert Canadian dollars and Mexican pesos to US dollars.

8. **Table 1** below shows the number and percentage of sellers at various aggregate sales levels.

Table 1 - Aggregated Sales Levels

Aggregate Sales	# of Sellers	% of Sellers	Running Total
$0	14	18.9%	18.9%
$0.01-$999	7	9.5%	28.4%
$1,000-$1,999	3	4.1%	32.4%
$2,000-$2,999	5	6.8%	39.2%
$3,000-$3,999	2	2.7%	41.9%
$4,000-$4,999	0	0.0%	41.9%
$5,000-$9,999	8	10.8%	52.7%

[1] Spot exchange rates downloaded July 9, 2024, from Federal Reserve at https://www.federalreserve.gov/datadownload/Download.aspx?rel=H10&series=dcb68f4102105ccfb32bff9774e687e8&filetype=csv&label=include&layout=seriescolumn&from=01/01/2020&to=07/31/2024.

$10,000-$14,999	12	16.2%	68.9%
$15,000-$19,999	6	8.1%	77.0%
$20,000-$24,999	0	0.0%	77.0%
$25,000-$49,999	7	9.5%	86.5%
$50,000-$99,999	6	8.1%	94.6%
$100,000+	4	5.4%	100.0%

9. FTC Counsel asked me to identify sellers who were able to sell on Amazon for one or more years. I calculated this as the number of days from registration date to (a) date seller is no longer able to conduct business or (b) end date of sales data. Any intervening periods where the seller is unable to conduct business are deducted. Information concerning blocks and suspensions was provided in the "Enforcement Annotation" tab in both files. Since status and enforcement actions are applied on a marketplace level, I used the maximum number of days any of a seller's marketplaces was able to sell. **Table 2** below shows the number and percentage of sellers at various aggregate sales levels for 27 sellers able to sell for between one and two years and **Table 3** shows the number and percentage of sellers at various aggregate sales levels for 23 sellers able to sell for two years or more.

Table 2 - Aggregated Sales Levels for 27 Sellers Operable 1-2 Years

Aggregate Sales	# of Sellers	% of Sellers	Running Total
$0	6	22.2%	22.2%
$0.01-$999	2	7.4%	29.6%
$1,000-$1,999	1	3.7%	33.3%
$2,000-$2,999	1	3.7%	37.0%
$3,000-$3,999	1	3.7%	40.7%
$4,000-$4,999	0	0.0%	40.7%
$5,000-$9,999	2	7.4%	48.1%
$10,000-$14,999	5	18.5%	66.7%
$15,000-$19,999	3	11.1%	77.8%
$20,000-$24,999	0	0.0%	77.8%
$25,000-$49,999	4	14.8%	92.6%
$50,000-$99,999	2	7.4%	100.0%

Table 3 - Aggregated Sales Levels for 23 Sellers Operable 2 Years or More

Aggregate Sales	# of Sellers	% of Sellers	Running Total
$0	4	17.4%	17.4%
$0.01-$999	0	0.0%	17.4%
$1,000-$1,999	0	0.0%	17.4%
$2,000-$2,999	1	4.3%	21.7%
$3,000-$3,999	0	0.0%	21.7%
$4,000-$4,999	0	0.0%	21.7%
$5,000-$9,999	2	8.7%	30.4%
$10,000-$14,999	3	13.0%	43.5%
$15,000-$19,999	3	13.0%	56.5%
$20,000-$24,999	0	0.0%	56.5%
$25,000-$49,999	2	8.7%	65.2%
$50,000-$99,999	4	17.4%	82.6%
$100,000+	4	17.4%	100.0%

10. FTC counsel provided me declarations from 19 consumers, and I used the information therein to identify them in the Amazon files. I did not find three of the declarants in the Amazon files, and some of the declarants had more than one merchant_customer_id in the Amazon files. Included in several of the consumer declarations were monthly financial projections. I compared the "Gross Revenue" figures in the "Twenty Four Month Forecast" section of the financial projections to aggregate sales in the Amazon files for each declarant that provided a projection. None of the declarants had sales that met the gross revenue projection for any of the twenty-four months projected. **Attachment A** is a true and correct copy of the declarants' twenty-four month projected gross revenue and sales.

11. FTC counsel asked me to summarize information for each of the 74 sellers. **Attachment B** is a true and accurate copy of this summary.

12. In Attachment B, the first column, which is unlabeled, is a row number to facilitate reading the table.

13. The "Store" column is the seller's mp_merchant_friendly_name from the "Seller Account Overview" tabs of the Amazon files. This name was not provided for several sellers.

14. The "Declarant" column identifies stores belonging to consumer declarants.

15. "Registration Date" is the registration_completion_date from the "Seller Account Overview" tabs of the Amazon files. Multiple entries in this column, and in the other columns in Attachment B, reflect differences among the seller's various marketplaces.

16. "Current Status" is seller_marketplace_status from "Seller Account Overview." These statuses are "NormalStatus," "PendingValidCCStatus," "BlockedStatus," and "TerminatedStatus." As stated above, the seller is deactivated and unable to conduct business when blocked or terminated.

17. "Date of BlockedStatus or TerminatedStatus" is the merch_mkt_curr_status_date_utc when seller_marketplace_status is "BlockedStatus" or "TerminatedStatus." Merch_mkt_curr_status_date_utc is from the "Seller Account Overview" tabs of the Amazon files, and Amazon stated it represents when the status was last changed.

18. "Reason for BlockedStatus" is the reason_rolllup from "Seller Account Overview" when the seller_marketplace_status is "BlockedStatus." As shown in Attachment B, reasons for sellers being blocked are "Counterfeit" (13 sellers), "Related Accounts" (13 sellers), "SPI Proactive Code of Conduct" (7 sellers), "Masquerading" (2 sellers), "Unknown" (2 sellers), and "Fraud" (1 seller). Similar information was not provided for marketplaces in "TerminatedStatus."

19. The table in Attachment B is split into two parts so it could fit the page size. The columns described above are in the "Part 1" table, and the columns described below are in the "Part 2" table. The unlabeled row number column, the

"Store" column, and the "Declarant" column are in both tables, and they are in the same order in both tables.

20. In Attachment B, "Orders with Product Quality Complaints" is the count of individual orders in which Amazon identified customer complaints based on specific phrases and keywords. This information was provided in the "Product Quality Complaints" tabs of the Amazon files. As shown in Attachment B, sellers had between 0 and 212 orders with product quality complaints.

21. The "Aggregate Sales" column is the seller's aggregate sales, which are discussed above.

22. "Months from First with Sales to Last with Sales" is the number of months from the first month with sales to the last month with sales. Note any months without sales between store registration and the first sale are not included in these figures.

23. The "Gross Revenue Projection Estimate" column in Attachment B is based on the financial projections discussed above and reflects the cumulative gross revenues for the number of months of sales. Because the projections vary between the consumer declarations, I used the minimum projection for each month to calculate total projected gross revenue to use uniform projections for all declarants. These gross revenue projections are below in **Table 4** along with the running total of projected gross revenue per month.

Table 4 - Gross Revenue Projections

Month	Minimum Projected	Running Total
1	$0	$0
2	$2,430	$2,430
3	$5,801	$8,231
4	$13,217	$21,448
5	$18,303	$39,751
6	$20,537	$60,288
7	$26,325	$86,613
8	$24,331	$110,944

9	$25,695	$136,639
10	$32,414	$169,053
11	$38,263	$207,316
12	$42,878	$250,194
13	$44,992	$295,186
14	$52,589	$347,775
15	$46,747	$394,522
16	$47,719	$442,241
17	$47,412	$489,653
18	$55,712	$545,365
19	$65,485	$610,850
20	$63,686	$674,536
21	$67,321	$741,857
22	$76,485	$818,342
23	$84,869	$903,211
24	$92,025	$995,236

24. Marketplace 603510 is omitted from Attachment B. It is in "TerminatedStatus" for all sellers that have it and there is no other information related to it in the Amazon files.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2024 at Chicago, IL.

Elizabeth Anne Miles

Attachment A

Attachment A – Declarants' Gross Revenue Projections and Amazon Sales

Ashby & Walden (Co-owners)		
Month	Gross Revenue Projection	Sales May 2022 - Apr. 2024
1	$4,650	$0
2	$11,101	$107
3	$25,293	$2,682
4	$35,025	$35
5	$46,315	$91
6	$45,937	$2,963
7	$55,902	$3,000
8	$61,370	$2,074
9	$62,207	$110
10	$61,204	$28
11	$76,859	$0
12	$95,540	$0
13	$92,584	$1,041
14	$78,434	$1,516
15	$92,707	$518
16	$104,660	$2,869
17	$113,733	$1,425
18	$117,701	$1,208
19	$131,921	$1,222
20	$141,706	$282
21	$146,991	$2,570
22	$150,656	$1,554
23	$171,335	$1,585
24	$195,199	$1,337

Maxwell		
Month	Gross Revenue Projection	Sales Jan. 2021 - Dec. 2022
1	$0	$0
2	$33,025	$0
3	$48,691	$0
4	$73,766	$0
5	$90,138	$0
6	$119,909	$43
7	$87,402	$2,659
8	$80,196	$6,587
9	$95,919	$5,648
10	$106,366	$6,632
11	$108,644	$7,656
12	$97,368	$4,272
13	$155,677	$13,268
14	$147,356	$12,312
15	$124,723	$5,892
16	$117,946	$6,718
17	$170,081	$16,909
18	$251,572	$7,605
19	$179,826	$11,688
20	$162,008	$13,638
21	$200,888	$11,327
22	$226,719	$10,991
23	$232,353	$7,954
24	$204,471	$6,842

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Murphy		
Month	Gross Revenue Projection	Sales Apr. 2022 - Mar. 2024
1	$3,000	$0
2	$7,162	$0
3	$16,318	$753
4	$22,597	$674
5	$29,252	$740
6	$28,348	$7,366
7	$26,325	$1,645
8	$34,962	$4,757
9	$45,381	$3,177
10	$41,658	$1,099
11	$44,647	$1,047
12	$54,386	$240
13	$63,214	$493
14	$57,220	$669
15	$58,956	$614
16	$66,892	$1,115
17	$71,742	$4,637
18	$73,581	$4,456
19	$74,252	$1,822
20	$85,763	$3,617
21	$99,184	$11,097
22	$98,424	$2,765
23	$104,490	$5,521
24	$117,509	$12,308

Meyer		
Month	Gross Revenue Projection	Sales Oct. 2022 - Sep. 2024
1	$0	$0
2	$2,430	$0
3	$5,801	$213
4	$13,217	$673
5	$18,303	$113
6	$20,537	$0
7	$28,235	$0
8	$24,331	$0
9	$25,695	$0
10	$32,414	$0
11	$38,263	$0
12	$42,878	$0
13	$44,992	$0
14	$52,589	$0
15	$46,747	$0
16	$47,719	$0
17	$47,412	$0
18	$55,712	$0
19	$65,485	$0
20	$63,686	$0
21	$67,321	$0
22	$76,485	$0
23	$84,869	$0
24	$92,025	$0

Patti			
Month	Gross Revenue Projection	Sales Apr. 2022 - Mar. 2024	
1	$4,650		$0
2	$11,101		$0
3	$25,293		$1,103
4	$35,025		$685
5	$46,315		$1,157
6	$45,937		$1,327
7	$55,902		$1,714
8	$61,370		$566
9	$62,207		$772
10	$61,204		$1,136
11	$76,859		$338
12	$95,540		$261
13	$92,584		$448
14	$78,434		$1,763
15	$92,707		$1,236
16	$104,660		$311
17	$113,733		$392
18	$117,701		$55
19	$131,921		$479
20	$141,706		$182
21	$146,991		$0
22	$150,656		$63
23	$171,335		$417
24	$195,199		$86

Attachment B

Attachment B - Seller Summary, Part 1

	Store	Declarant	Registration Date	Current Status	Date of BlockedStatus or TerminatedStatus	Reason for BlockedStatus
1	24Sun		1/12/2022	BlockedStatus	11/17/2022	SPI Proactive Code of Conduct
2	316 Services	Greiner	10/4/2022	BlockedStatus	9/30/2023	Counterfeit
3	AAK4LES Commerce	Williams	7/27/2022	NormalStatus		
4	Ascend with Jacob and Amber LLC		12/26/2022	NormalStatus		
5	Bahia Azul		9/23/2022	BlockedStatus	2/9/2023	SPI Proactive Code of Conduct
6	Beginning of Forever	Palmisano	6/13/2023	BlockedStatus	11/2/2023	Fraud
7	Blue Lake Venture LLC		10/6/2021	BlockedStatus	8/26/2022	Related Accounts
8	BURKE ENTERPRIZE LLC		10/20/2021	NormalStatus		
9	Cacique NW Group LLC		1/23/2023	NormalStatus		
10	CASIVA	Meyer	9/12/2022	BlockedStatus	2/9/2023	SPI Proactive Code of Conduct
11	CGH Retail TX		7/31/2022	BlockedStatus	1/12/2023	Related Accounts
12	CJR whole sellers		8/2/2023	PendingValidCCStatus		
13	Class Trend		9/28/2022	BlockedStatus	9/12/2023	Counterfeit
14	Coastal products	Bowen	3/6/2023	BlockedStatus	10/17/2023	Masquerading
15	CoBoCo		4/12/2022	PendingValidCCStatus		
16	CPriority Goods	Winsor	8/2/2023	BlockedStatus	3/26/2024	Related Accounts
17	Emery Ecom		8/4/2022	NormalStatus		
18	Force5 Ventures	Murphy	3/29/2022	BlockedStatus	4/17/2024	Counterfeit
19	Fulfill Happy		12/12/2022	NormalStatus, PendingValidCCStatus		
20	G&S Properties LLC		2/26/2022	NormalStatus, PendingValidCCStatus		
21	GialmiDistributions		5/18/2022	BlockedStatus	12/8/2022, 9/14/2023	Counterfeit
22	Harlo Henfrey	Ashby & Walden	4/21/2022	NormalStatus		

	Store	Declarant	Registration Date	Current Status	Date of BlockedStatus or TerminatedStatus	Reason for BlockedStatus
23	Hasiyet's Shop		10/12/2023	NormalStatus		
24	Hi Standards Marketplace	Lathan	6/9/2022	BlockedStatus	9/12/2023	Counterfeit
25	Interstate eCommerce		10/4/2023	BlockedStatus	6/17/2024	Unknown
26	Invizicorn		7/18/2022	BlockedStatus	3/4/2023	Related Accounts
27	IRON CITY SALES		12/3/2021	BlockedStatus	9/12/2023	Counterfeit
28	Legacy I LLC		10/15/2021	NormalStatus		
29	Little Giant Inc.		11/8/2021	NormalStatus, PendingValidCCStatus		
30	LPII Holdings		9/18/2021	BlockedStatus	1/27/2023	Related Accounts
31	Maverick TC		6/16/2023	NormalStatus		
32	Maxland Innovative Solutions	Maxwell	12/31/2020	NormalStatus, PendingValidCCStatus		
33	Maxland Innovative Solutions	Maxwell	1/1/2021	NormalStatus		
34	Maxland Innovative Solutions	Maxwell	1/1/2021, 2/9/2021	NormalStatus		
35	Maxland Innovative Solutions	Maxwell	1/1/2021	NormalStatus		
36	Mira + Ro	Schneider	7/29/2022	BlockedStatus	9/10/2023	Counterfeit
37	Moore Quality Bargins		2/7/2022	NormalStatus		
38	Muller Merch	Muller	4/29/2022	BlockedStatus	4/25/2024	Related Accounts
39	Next Play Shop		3/2/2011, 3/9/2023	NormalStatus		
40	Nice Products US	Patti	3/28/2022	NormalStatus		
41	not provided		4/22/2015	TerminatedStatus	4/14/2017	
42	not provided		6/4/2019	TerminatedStatus	2/9/2021	
43	not provided		2/5/2018	TerminatedStatus	5/11/2023	
44	not provided	Nilsen	12/22/2022	TerminatedStatus	5/11/2024	
45	Partridge Store		1/15/2023	NormalStatus		

	Store	Declarant	Registration Date	Current Status	Date of BlockedStatus or TerminatedStatus	Reason for BlockedStatus
46	Pinnacle ECom	Sanford	12/9/2021	BlockedStatus	7/31/2023	Counterfeit
47	Polk & Polk Holdings LLC		2/18/2022	BlockedStatus	12/2/2022	Related Accounts
48	Polk & Polk Holdings LLC		2/18/2022	BlockedStatus	12/2/2022	Related Accounts
49	Polk & Polk Holdings LLC		2/18/2022	BlockedStatus	12/2/2022	Related Accounts
50	Polk & Polk Holdings LLC		2/11/2022	BlockedStatus	11/30/2022	SPI Proactive Code of Conduct
51	Polk&CAM Holdings LLC		2/18/2022	BlockedStatus, PendingValidCCStatus	9/15/2023	Unknown
52	Positive Momentum		6/20/2023	BlockedStatus	6/3/2024	Related Accounts
53	RA258		3/24/2022	BlockedStatus	9/17/2023	Counterfeit
54	Riveras Market Place		10/21/2021	NormalStatus, PendingValidCCStatus		
55	S&B Mgmt Group, LLC		10/21/2022	NormalStatus		
56	SBB Enterprises, LLC		1/26/2023	NormalStatus		
57	Seaside Enterprise Group		10/1/2014, 11/25/2015	NormalStatus, TerminatedStatus	1/24/2016	
58	Seaside Trading Group LLC		2/2/2023	NormalStatus		
59	Seeratan Ecom		12/31/2021	BlockedStatus, NormalStatus	10/19/2023	Counterfeit
60	SeptemberMeena	Nilsen	9/14/2022	NormalStatus		
61	SLWarehouse		2/10/2022	BlockedStatus	9/12/2023	Counterfeit, Masquerading
62	Storeporium, Inc.		11/14/2022	BlockedStatus	12/14/2022	SPI Proactive Code of Conduct
63	TANAS LLC		8/1/2022	BlockedStatus	12/25/2022	Related Accounts
64	TangoBravo		5/16/2022	NormalStatus, PendingValidCCStatus		
65	TCB Brands, LLC		6/21/2022	BlockedStatus	12/23/2022	SPI Proactive Code of Conduct
66	TheBigStarStore		9/3/2020	NormalStatus		

	Store	Declarant	Registration Date	Current Status	Date of BlockedStatus or TerminatedStatus	Reason for BlockedStatus
67	This & That by Mac, LLC		8/20/2022	BlockedStatus	9/10/2023	Counterfeit
68	THJ Products LLC		7/11/2022	BlockedStatus	9/22/2023	Related Accounts
69	Three Angels, LLC		4/4/2022	BlockedStatus, NormalStatus	12/26/2022	Related Accounts
70	Vibe Jaxx		10/19/2022	NormalStatus		
71	Watermelon Winter		1/25/2022	BlockedStatus	11/3/2022, 11/4/2022, 9/12/2023	Counterfeit
72	Welcome Home Decor, LLC		12/1/2021	NormalStatus		
73	Wellah		7/28/2021	NormalStatus		
74	Woodbrook Delivery		7/14/2022	BlockedStatus	12/23/2022	SPI Proactive Code of Conduct

Attachment B - Seller Summary, Part 2

	Store	Declarant	Orders with Product Quality Complaints	Aggregate Sales	Months from First with Sales to Last with Sales	Gross Revenue Projection Estimate
1	24Sun		6	$25,899	9	$136,639
2	316 Services	Greiner	2	$668	9	$136,639
3	AAK4LES Commerce	Williams	0	$1,422	1	$0
4	Ascend with Jacob and Amber LLC		6	$11,589	10	$169,053
5	Bahia Azul		0	$2,501	3	$8,231
6	Beginning of Forever	Palmisano	9	$2,505	3	$8,231
7	Blue Lake Venture LLC		25	$9,076	8	$110,944
8	BURKE ENTERPRIZE LLC		18	$13,696	25	> $995,236
9	Cacique NW Group LLC		8	$8,592	7	$86,613
10	CASIVA	Meyer	0	$999	3	$8,231
11	CGH Retail TX		0	$1,582	5	$39,751
12	CJR whole sellers		0	$9	1	$0
13	Class Trend		9	$5,141	2	$2,430
14	Coastal products	Bowen	3	$2,083	5	$39,751
15	CoBoCo		46	$53,631	24	$995,236
16	CPriority Goods	Winsor	6	$10,451	5	$39,751
17	Emery Ecom		0	$185	1	$0
18	Force5 Ventures	Murphy	58	$81,882	23	$903,211
19	Fulfill Happy		0	$0	0	
20	G&S Properties LLC		21	$18,103	27	> $995,236
21	GialmiDistributions		30	$33,915	15	$394,522
22	Harlo Henfrey	Ashby & Walden	83	$28,220	23	$903,211
23	Hasiyet's Shop		0	$893	1	$0
24	Hi Standards Marketplace	Lathan	35	$38,329	14	$347,775
25	Interstate eCommerce		1	$10,783	7	$86,613

	Store	Declarant	Orders with Product Quality Complaints	Aggregate Sales	Months from First with Sales to Last with Sales	Gross Revenue Projection Estimate
26	Invizicorn		6	$14,784	5	$39,751
27	IRON CITY SALES		25	$16,687	20	$674,536
28	Legacy I LLC		39	$54,498	30	> $995,236
29	Little Giant Inc.		13	$10,360	18	$545,365
30	LPII Holdings		3	$11,274	12	$250,194
31	Maverick TC		0	$0	0	
32	Maxland Innovative Solutions	Maxwell	212	$172,961	35	> $995,236
33	Maxland Innovative Solutions		0	$0	0	
34	Maxland Innovative Solutions	Maxwell	0	$0	0	
35	Maxland Innovative Solutions	Maxwell	0	$0	0	
36	Mira + Ro	Schneider	4	$7,771	12	$250,194
37	Moore Quality Bargins		22	$16,356	22	$818,342
38	Muller Merch	Muller	7	$13,405	17	$489,653
39	Next Play Shop		3	$2,636	51	> $995,236
40	Nice Products US	Patti	18	$14,489	23	$903,211
41	not provided		0	$0	0	
42	not provided		0	$0	0	
43	not provided		0	$0	0	
44	not provided	Nilsen	17	$10,617	10	$169,053
45	Partridge Store		5	$19,417	14	$347,775
46	Pinnacle ECom	Sanford	51	$76,724	16	$442,241
47	Polk & Polk Holdings LLC		0	$0	0	
48	Polk & Polk Holdings LLC		0	$0	0	
49	Polk & Polk Holdings LLC		0	$0	0	
50	Polk & Polk Holdings LLC		0	$3,102	5	$39,751
51	Polk&CAM Holdings LLC		16	$27,285	14	$347,775
52	Positive Momentum		0	$11,872	4	$21,448
53	RA258		85	$68,972	16	$442,241

	Store	Declarant	Orders with Product Quality Complaints	Aggregate Sales	Months from First with Sales to Last with Sales	Gross Revenue Projection Estimate
54	Riveras Market Place		18	$64,792	31	> $995,236
55	S&B Mgmt Group, LLC		0	$0	0	
56	SBB Enterprises, LLC		0	$0	0	
57	Seaside Enterprise Group		211	$635,712	54	> $995,236
58	Seaside Trading Group LLC		12	$18,311	13	$295,186
59	Seeratan Ecom		75	$109,649	20	$674,536
60	SeptemberMeena	Nilsen	1	$2,438	13	$295,186
61	SLWarehouse		6	$5,925	2	$2,430
62	Storeporium, Inc.		0	$231	1	$0
63	TANAS LLC		0	$0	0	
64	TangoBravo		22	$8,183	23	$903,211
65	TCB Brands, LLC		4	$1,622	5	$39,751
66	TheBigStarStore		26	$29,517	42	> $995,236
67	This & That by Mac, LLC		17	$11,442	13	$295,186
68	THJ Products LLC		2	$3,708	12	$250,194
69	Three Angels, LLC		1	$6,411	5	$39,751
70	Vibe Jaxx		0	$456	1	$0
71	Watermelon Winter		25	$37,218	18	$545,365
72	Welcome Home Decor, LLC		74	$171,354	23	$903,211
73	Wellah		31	$19,923	31	> $995,236
74	Woodbrook Delivery		2	$9,321	5	$39,751

Exhibit 29

DECLARATION OF NAVID MASSARAT

1. My name is Navid Massarat. I am over 18 years old. The following statements are within my personal knowledge.

2. I am an Honors Paralegal at the Federal Trade Commission ("FTC") and have been employed as such since July 2023. My office address is 600 Pennsylvania Ave., NW, Washington, DC 20580. My job functions include providing investigational and litigation support to Bureau of Consumer Protection attorneys and other FTC staff. Among other things, my job involves the analysis of electronic discovery, capturing of electronic evidence, and outreach to consumers.

3. In the course of my duties, I was assigned to work on matters regarding Ascend Ecom (which I hereinafter refer to as "Ascend").

4. In about June 2024, I began reaching out to aggrieved consumers of Ascend who had made complaints regarding Ascend. While the vast majority of consumers I spoke to were cooperative and even thankful, several consumers told me they were not sure if they could speak with FTC employees because they had signed an agreement with Ascend that they believed might prevent them from talking about Ascend. Although I did not solicit any more information from these consumers after they notified me of their agreement, several consumers mentioned that Ascend only offered this agreement after the consumers had criticized Ascend. One consumer in particular, [redacted], told me that Ascend offered him this settlement agreement only after he created a Facebook group chat for aggrieved Ascend customers and publicly called Ascend a scam.

5. In my correspondence, I asked consumers if they were willing to provide basic store and contact information. One consumer, Gabriel Pimentel, whom I first spoke with on June 18, 2024, told me that he had invested $200,000 for four existing stores. Ascend never transferred him ownership of three of those stores. Mr. Pimentel told me that he has asked for but not received a refund from Ascend.

6. Between May and August 2024, various Ascend customers sent FTC staff documents, media, or website links related to Ascend. Some of these consumers notified FTC staff that they believed Ascend was creating new websites and changing its business name to avoid detection.

7. On May 11, one Ascend consumer, [redacted], sent FTC staff a TrustPilot link about ACVPartners.ai which [redacted] claimed was affiliated with Ascend. Trustpilot is a well-known public website that allows individuals to read and write reviews of businesses. [redacted] believed Ascend was operating under this new business name, ACVPartners.ai. [redacted] said it looked like Ascend was posting fake positive reviews and taking down negative reviews of its business on TrustPilot. On June 6, 2024, I reviewed and captured this TrustPilot website. **Attachment A** is a true and accurate copy of the images from the TrustPilot website.

8. [redacted] believed Ascend was also operating under the name Accelerated eCommerce Ventures. [redacted] sent FTC staff a link to a LinkedIn page for Accelerated eCommerce Ventures. On June 6, 2024, I reviewed and captured images of this LinkedIn web page. **Attachment B** is a true and accurate copy the captures I made of the LinkedIn website.

9. On June 24, 2024, I visited and captured images of another website that FTC staff suspected of being affiliated with Ascend: https://ethixcapital.com. **Attachment C** is a true and accurate copy of the website capture. On the main page of Ethix Capital website was a video featuring someone named Haadi from "Ethix Capital by Ascend." I recorded this video on June 25, 2024. **Attachment D** is a true and accurate copy of the recording. **Attachment E** is a transcript of the recording.

10. On July 18, 2024, a consumer, Jeanette Schneider, sent FTC staff a link to a podcast published on YouTube by Monument Real Estate Capital on June 4, 2024, that featured Will Basta, whom I know to be a top official of Ascend. In

the podcast, Will Basta claims that he can create passive income for clients through a fully managed, done for you e-commerce service. I watched and recorded this podcast on July 18, 2024. **Attachment F** is a true and accurate recording of the podcast.

11. On August 5, 2024, another consumer, Sean Ashby, sent FTC staff a link to an unlisted YouTube video that was posted by ACV: Accelerated eCom Ventures on July 26, 2024. The video is available at https://youtu.be/LgyOtAD0Ayw. Unlisted YouTube videos are like ordinary videos, but will not appear in searches on YouTube; therefore, unlisted videos can only be accessed through direct links. In this self-described "documentary," Will Basta says he had "built hundreds of successful stores and businesses for clients." **Attachment G** is a true and accurate recording of the video. **Attachment H** is a transcript of the video.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2024 at Washington, DC.

NAVID MASSARAT

Digitally signed by NAVID MASSARAT
Date: 2024.08.30 13:26:39 -04'00'

NAVID MASSARAT

Attachment A

Trustpilot
Search for another company...
Categories Blog Log in For businesses

ACV

Reviews 61 • Excellent

4.3

acvpartners.ai
Visit this website

Write a review

Reviews ★ 4.3

61 total

5-star	79%
4-star	8%
3-star	2%
2-star	0%
1-star	11%

Filter Sort: Most recent

Jaden Barrett
1 review US

Updated 7 days ago

Very good Service Highly recommend!

It took me 3 years of dancing around this idea of getting involved in Ecommerce. I finally pulled the trigger in January with a TikTok and Amazon. This is an awesome industry and super exciting. A big unpredictable in terms of daily returns as it goes up and down. But I'm happy to leave a positive review for them as this team has been good to work with this year so far.

Date of experience: April 09, 2024

Useful 1 Share

Reply from ACV Updated 7 days ago

Happy to see you stores are moving at a steady past.

Thanks for the review Jaden

Mgmt

Alexis Lopez
1 review US

Jun 6, 2024

Here's the deal

Here's the deal: I'm in it for the margins, and boy, in ecommerce they are they sweet.

Company activity

See all

- Claimed profile
- No verified details yet
- Replied to 6 out of 6 negative reviews
- Replies to negative reviews in < 2 days

Advertisement

Chat w/ an expert Online Now

A Technician Will Answer Your Questions in Minutes. Chat Now.

JustAnswer

Open

About ACV

Information written by the company

We are a dynamic company specializing in building and developing brands, and creating cash-flowing online businesses with a focus on long-term business appreciation for client investors. Offering an end-to-end launchpad and management solution, we give people the chance to tap into e-commerce without prior experience and add a new, valuable asset to their portfolio. With a decade of experience in emerging e-commerce marketplaces, our operations are supported by an extensive logistical network with strategic locations in Florida, Arizona, and Texas. We maintain a robust international e-commerce platform presence across the UK, EU, USA, and the Amazon Dubai market, and are a recognized seller on major platforms like Amazon, Walmart, and Etsy. Our seasoned leadership team brings a wealth of experience from multiple ventures, enhancing our capabilities in manufacturing niche products and sourcing licensing from top selling brand. We are proud strategic partners of Gelato.com, providing top-tier fulfillment and sourcing solutions to streamline brand building for our clients. Our collaborations with platforms like TikTok Shop as a multichannel manager ,various distributors, and print-on-demand firms uniquely position us to leverage opportunities and drive both immediate returns and sustainable growth for our clients.

We're talking a solid 26% + across the board. (So far). seriously impressive

Now, let's talk products. ACV's got a diverse lineup on my stores that's got me pumped. We're moving everything from sleek Bluetooth speakers to artisanal candles to gourmet coffee blends. They're flying off the shelves. We're killing it on Walmart and TikTok, expanding our reach and boosting our bottom line.

Why is this 5 stars? Simply because I am making money. I should have left this review sooner, but I didn't know they were on trust pilot until my account manager said to share my experience. I dont want to leave her out either. Lotis has been super easy to work with!

Date of experience: April 19, 2024

Useful Share

AH

Ashton Hall
1 review US

Jun 6, 2024

Let me start by saying my journey with...

Let me start by saying my journey with ACV Partners wasn't all bad. In fact, I made a decent chunk of change- over $ 100,000 through their platform. But, despite that, I've gotta leave a one-star review for a bunch of reasons that really soured the whole experience.

So here's the deal: I decided to part ways with ACV because I wanted to take the reins of my business and run it my way. Retirement was calling and I figured it was time to be my own boss. ACV was cool with it and they gave me this whole transition plan. But, man, things went downhill real quick after that.

As soon as I cut ties with ACV and tried to go solo, bam, my Amazon store got the boot. Talk about a punch in the gut. I followed their transition plan to a T and this is what I get? Deactivated without a warning? Not cool.

So, I did what any sane person would do - I reached out to ACV for help. But guess what? Now that I'm not their partner anymore, the responses I get are about as helpful as a screen door on a submarine. It's like I'm shouting into the void and no one's listening.

Now, I'm left scratching my head, wondering how things went south so fast.

And that's why I'm leaving this one-star review.

Date of experience: April 05, 2024

Useful Share

Reply from ACV 7 days ago

Ashton,

Thank you for sharing your experience with us, and we appreciate the opportunity to address your concerns.

We're glad to hear that you were able to achieve success and generate significant revenue through our platform. However, we're truly sorry to hear about the challenges you faced during your transition away from ACV.

We understand that transitioning your business can be a complex process, and we strive to provide comprehensive support to all our clients during this period. It's disheartening to hear that your Amazon store encountered difficulties after parting ways with us. We assure you that our team is committed to assisting our clients, even after they've moved on from our services.

We apologize if you felt that the support you received post-transition was inadequate. We value all feedback and are continually working to improve our processes to better serve our clients.

If you're open to it, we'd love the opportunity to discuss your experience further and see if there's anything we can do to rectify the situation. Please feel free to reach out to us directly, and we'll do our best to address your concerns.

Contact

United States

Categories

Business and IT Consulting Agency
Logistics Service
Media and Marketing Agency

People who looked at this company also looked at

Ecom Authority
68
Claimed

AELT
96
Asking for reviews

Why Unified
272
Asking for reviews

Suggested companies are based on people's browsing tendencies.

The Trustpilot Experience

We're open to all

We champion verified reviews

We fight fake reviews

We encourage constructive feedback

We verify companies and reviewers

We advocate against bias

Take a closer look

Thank you for your understanding, and we wish you the best in your future endeavors.

C Charlie Clark
1 review US

★★★★★ Jun 5, 2024

As relatively new player in the...

As relatively new player in the e-commerce space, I was apprehensive about choosing the right partner to help me navigate my internet here. ACV quickly put my What I appreciate most is ACV's transparency throughout the process. They don't sugarcoat the realities of e-commerce but provide realistic expectations and actionable strategies and options for success. I have used them for my current Tiktok business and scaling, it as well as launching on Amazon.

Date of experience: April 22, 2024

Useful 1 Share

Reply from ACV Jun 5, 2024

Charlie, thanks for your review. We also appreciate the testimonial video you recently did for the company.

Happy to be partners.

M Matias Young
1 review US

★★★★☆ Jun 5, 2024

I onboarded in the fall

I onboarded in the fall. After a few months of bit show startup in sales, things started to kick into gear. I have an Etsy business with ACV. Whats cool is they're selling this digital product line with really high margins, it's a POD item, so no need to pre-buy any inventory.
I'm looking into other models with them currently.

Date of experience: May 22, 2024

Useful 1 Share

Reply from ACV Jun 5, 2024

Thanks for the feedback Matias!

 Evan Watson
1 review US

★★★★★ Jun 2, 2024

Real estate is my main gig

Real estate is my main gig. I pretty much stayed in this industry forever. I decided to make the leap into ecommerce with ACV. I have to say I'm impressed on the industry and the returns.

If you are familiar with investing, how it works and how businesses cash flow an run, I think you'll be happy with this type of offer. It seems that the people here who aren't happy tend to be a bit on the amateur side. I would not invest if this is your only money or your first business investment. Other than that, returns are double my real estate. I am happy to be a reference. You can find me on Linkedin/Facebook.

Date of experience: May 24, 2024

Useful 1 Share

Reply from ACV Jun 2, 2024

Hey Evan!

Thanks for your input and review. Happy to have you onboard with us!

Management



Carlos Hall
1 review US

Jun 1, 2024

I am one of their clients who decided...

I am one of their clients who decided to take the chance on a tiktok business. I have to say what an awesome market. The store has been moving much faster than I expected. I am 2 months in on this and just had my first 1,000 dollar day. I hope this keeps up. Where I can provide feedback is I think they should expand their client portal a bit and also include a more detailed dashboard on results. The team is pleasant to work with, overall A+. I think my next move will be private label development on TT on Amazon.

Date of experience: May 30, 2024

Useful 3 Share

Reply from ACV Jun 2, 2024

Thanks for the feedback Carlos! We will look into this as we are always looking for ways to improve the partner experience.

We appreciate your review!

Management

T

Tyson Lewis
1 review US

May 31, 2024

I think this is an awesome business...

I think this is an awesome business model. I'm fairly new to this, I have no complaints yet. They asked me for an honest review, so here it is. Everything up to this point has been spot on. I will be updating this if something goes away.

Date of experience: May 07, 2024

Useful 1 Share

BL

Branden Lathan
2 reviews

Updated Jun 2, 2024

Stay far away from this company!

Ive been a "client" for over two years now at this point. Ascend got my account deactivated in September of last year for selling counterfeit products and Ascend never even attempted to appeal Amazons decision to get my store reactivated. Amazon also froze my account balance at that time and have not released that either. I most recently paid Ascend $9280 via wire transfer in July of 2023 for a wholesale product order. Not a single product was ever delivered from that payment and not a single penny was returned despite asking for them to return it. That is a crime. Sadly, I

paid via wire transfer because they wanted to charge me a fee to pay with credit card so I cant dispute the charge and clawback that payment. And to make matters worse, in the past two weeks I've received backdated invoices for ~$2000 they say I owe them from last year and tried to threaten to send it to collections if I dont pay? The audacity. I have filed a case with the CFPB for unlawful debt collection. In total, I'm out over $50,000 and am currently taking legal action against them. For the last 9 months there has not been any success in trying to civilly rectify my situation through communication outside of the courts.

I STRONGLY urge any potential clients to do their own due diligence on this company, do not only trust the public reviews or any testimonial videos they provide you like I did. There is a Facebook group that has over 100 clients that speak about experiences very similar to mine. Search for "Clients of Ascend Ecom" (their original company name prior to rebranding) and check it out for yourself.

Also feel free to find me on Facebook by name and send me a message. I'm more than happy to share all the evidence of all their wrongdoings not just with me, but with many others. I've already talked to quite a few potential clients and my goal is to just try to make sure no one else becomes a victim.

Date of experience: May 23, 2024

Useful 2 Share

Reply from ACV 6 days ago

Hello Brandon,

Thank you for bringing your concerns to our attention. We want to clarify some misconceptions and address the points you've raised in your review.

First and foremost, it's important to note that ACV and Ascend are separate entities and businesses entirely, they operate separately and have no affiliation in terms of branding, each focusing on distinct areas of e-commerce. ACV specializes in emerging marketplaces, private label branding, and international markets, while Ascend operates independently, primarily focusing on wholesale FBA.

Our sister company, Ascend, has informed us of their efforts to resolve any issues you may have encountered, including offering early contract terminations that would include the products you purchased. However, it seems these offers were not accepted, leading to continued dissatisfaction.

Regarding your experience... and the ability to purchase products on a rolling basis, Ascend has noted that your working capital often fell below the threshold required for wholesale operations. Wholesale models typically require a certain level of working capital to sustain ongoing inventory purchases and operations effectively. It's crucial to maintain sufficient capital to support the demands of the business and ensure its scalability.

Additionally, it's clear that there may be some misunderstanding or miscommunication at play here. We've offered options to you as recently as this week, yet they have been met with denials. It seems there may be an ulterior motive behind these actions. Slandering on the internet, especially with untruthful claims, is not only damaging but also unnecessary.

We wish you the best of luck in your endeavors and hope that you can find a resolution that satisfies all parties involved.



Leo Hale
1 review US

★★★★★ May 30, 2024

I left another company who I will not...

I left another company who I will not name in the fall of 2023. ACV took over the operation of my amazon. They were able to get the health back in good standing and get it performing again. I am happy with my decision. Also, my account manager Lotis is super responsive. I'd recommend. I wish I went with them in the beginning.

Date of experience: May 08, 2024

Useful 2 Share

See if a website is trustworthy
without leaving the page

Trustpilot

Get Chrome extension



Adrian Serina Sr
1 review US

May 29, 2024

I am a past client

I am a past client. I actually don't have a store with them currently..Instead i'm basically providing my feedback on my experience with them in the past. I had a Walmart store with them for 2 years. I ended up selling my business when I moved out of the country, but I will say overall it was a good opportunity and investment. I was able to sell it for about 45K and I also was able to recoup my upfront fee I paid the company. My guess is this company has only grown and gotten better since my time with them in 2022.

Date of experience: May 24, 2024

Useful 2 Share

L

Luis Jones
1 review US

Updated May 24, 2024

Very good service!

I went all in. I have 4 different businesses with them and it's been 1.5 years.

Walmart, Amazon private label and TikTok. All are unique programs with strong returns so far. I think TikTok was a little inconsistent and still is. Walmart I got denied on my app but got approved the second time. Amazon has been smooth.

I really don't enjoy the Walmart seller platform. It's hard for me to read returns data and it's glitchy, but it's not their fault so I won't take astar away because of this.

Date of experience: May 01, 2024

Useful 1 Share

E

Eric Moore
1 review US

May 22, 2024

I'm making about 2-3k a month right now...

I'm making about 2-3k a month right now on my TikTok store which is good, but I'm uneasy..I'm nervous about this TikTok ban. Once I get reassurance this won't happen I'll update my stars here.

Date of experience: May 10, 2024

Useful 2 Share

RC

Ryder Cook
1 review US

May 22, 2024

I'd recommend those guys for sure

I'd recommend those guys for sure. I went through like 3 months of conversations with multiple companies, I just felt the most comfortable here. Im about 7 months in now and everything has been pretty spot on as expected in terms of onboarding and revenue.

Date of experience: May 09, 2024

Useful 2 Share

J

Jaxton Brown
1 review US

★★★★★ May 21, 2024

I work in real estate

I work in real estate. This is an awesome alternative option for me to diversity. Biggest + have is all the credit card points I've accrued on inventory purchases with my amex cards. ACV all around has been super easy to work with and my businesses on Amazon is getting more sales every week since I started. Happy about my decision so far

Date of experience: May 11, 2024

Useful 2 Share

JC

Jack Clark
1 review US

★★★★★ May 21, 2024

I don't have time to write a bunch

I don't have time to write a bunch. I'm a lawyer, so first thing I'll say is their contract is fair and that's rare. They truly have a clean contract and offering. I just signed up with them last week, so onboarding call was great today and I'm excited to see this play out. TBD on the rest, I'll update later.

Date of experience: May 07, 2024

Useful 2 Share

Reply from ACV May 21, 2024

Hey Jack-

Thanks for the feedback about the onboarding and the contract. Happy to have you with us.

J.S

Management



Amna naseem
1 review US

★★★☆☆ May 21, 2024

I am being as honest as I can:

I am being as honest as I can:

Pros : They have a client portal which is really awesome to have everything centralized because I have 4 stores with them. It has all results and everything I need. They also offer the best programs, I think they're advanced I this market. Results have been stready

Cons : onboarding was easy, but it took a few weeks for traction in my stores. I also wish I was able to get approved for the TikTok fulfillment option which I got denied. I

think I should get it eventually

I'll
Give them 3 stars now

Date of experience: May 03, 2024

Useful 1 Share

Reply from ACV May 21, 2024

Hey Amna,

Thanks for this feedback. Your FBT approval is up to tiktok, we do not have control over this piece. Given its limited to established sellers, we have confidence in your approval after a few months.

D David Nelson
1 review US

★★★★★ May 20, 2024

I'll keep it short

I'll keep it short. I have essentially doubled my investment in 22 months. This is what I care about. So complaining about anything else seems irrelevant. I invested in ecommerce to make money and I have been, so im giving them 5 stars.

Date of experience: May 01, 2024

Useful 2 Share

Md Jensen Scott
1 review US

★★★★★ May 20, 2024

I might be one of the longest clients...

I might be one of the longest clients with them. I came onboard in 2020. So I have to say, I have seen everything. There's been ups and downs,like any company. I am leaving this review now, 4 years after signing with them, because I just got an offer for my amazon business. I am selling it at a 4X multiple on my rev. Super exciting. I think the patient paid off. I had Walmart and Amazon with them. Both had strong months and slower times but the best part about partnering with them is they were constantly adapting. I broke even on my startup cost in about 12 months and I have been taking in about 3-6k per store in the last year. Early 2023 there was a hiccup but it didnt last long. I had some issues with inventory. These guys are the real deal. If you are looking for a legitimate partner, youre in the right place.

Date of experience: May 04, 2024

Useful 1 Share

W Walter Norris
1 review US

★★★★★ May 18, 2024

Overall this has been a good choice

Overall this has been a good choice. Ecommerce is super complex so it's nice having them handle all the details of my business. I did an enterprise style package at a 80/20 Split with them, cash flow started to hit month 5.

I'm super busy with my agency business so this is an awesome side hustle with little to no maintenance involved.

I do wish they did a bit more with Shopify but Overall they have a strong system for

amazon and Walmart/ tiktok.

Date of experience: May 14, 2024

Useful 1 Share

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Attachment B

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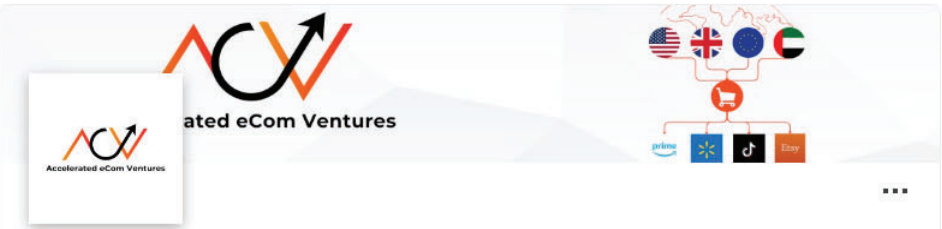

ACV: Accelerated eCommerce Ventures

Business Consulting and Services

Dallas, Texas · 706 followers

A powerhouse in tech, brand dev + ecommerce growth. We launch and scale online businesses globally for our clients

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About us

ACV | Accelerated eCommerce Ventures: We are a dynamic and versatile powerhouse, seamlessly integrating the roles of a logistics service provider, wholesale distributor, brand developer and e-commerce growth agency. Our distinctive business model has contributed to the achievements of numerous clients, assisting them in building cash flowing assets on Amazon, Walmart, Tiktok and more.We take great pride in operating from state-of-the-art warehouses, both domestically and in 4 countries abroad, ensuring smooth logistics and distribution processes.

Our mission revolves around establishing viable and prosperous Amazon businesses on behalf of our clients. We take on the responsibilities, managing every intricate detail ranging from product sourcing to customer support. This approach empowers our clients to harvest the advantages without being entangled in operational intricacies.

Apart from our specialized services tailored for Walmart, Tiktok, Etsy and Amazon, we possess an expertise in brand establishment. Our focus lies in cultivating product brands with a strategic vision for long-term growth, facilitating our clients in establishing enduring, lucrative presence within the market. With ACV, clients receive more than a service provider; they gain a results-driven partner devoted to their progress.

Website	https://www.ecomwithacv.io
Industry	Business Consulting and Services
Company size	51-200 employees
Headquarters	Dallas, Texas
Type	Privately Held
Founded	2020
Specialties	logistics, ecommerce, brand development, technology, and artificial intelligence

Locations

Primary

Dallas, Texas, US

Get directions

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Employees at ACV: Accelerated eCommerce Ventures



Krizzia Kate Sanchez
Graduated Bachelor's Degree in Business Administration major in Financial and Management Accounting



Mark Angelo Musni
Project Management and Business Development/Improvement Expert



Jeremy Leung
Entrepreneur & Investor Disrupting the E-Commerce Automation Space



Carla Monica Ignacio
Freelancer | Technical Support | Client Relations Associate

See all employees

Updates

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Did you know social commerce is set to have a 30% higher conversion rate than traditional e-commerce by 2026? 📈

Integrating shopping directly into social media, offers a seamless and engaging experience that keeps customers coming back.

Why the boost?

Social commerce leverages real-time interactions and trust-building, making it easier for consumers to purchase without leaving their favorite apps.

It's all about connecting, engaging, and converting. 🔥



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ACV's multi-channel management services streamline your ecommerce operations across platforms like Amazon, Walmart, and TikTok Shop.

Partnering with ACV is the game-changer you've been looking for!

ACV provides you with top-notch resources, expertise, and support to help your online store thrive in the competitive market. 🔥

By teaming up with ACV, you'll gain access to exclusive tools and insights that can boost your sales and improve customer engagement. Our tailored strategies are designed to fit your unique business needs. 📈



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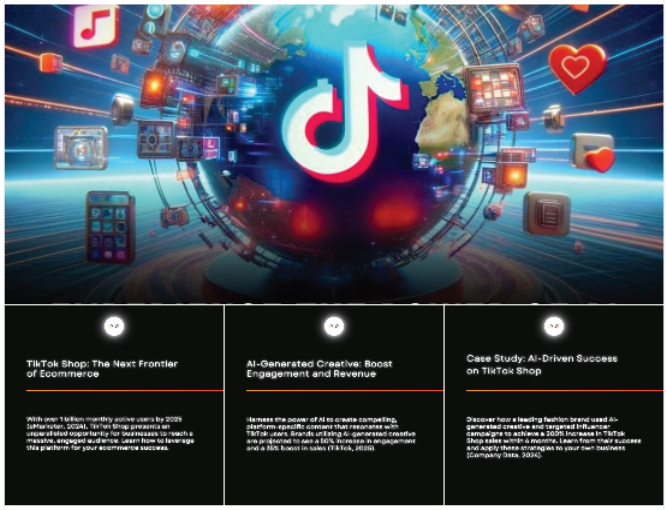
🌟With over 1 billion monthly active users by 2025 (eMarketer, 2024), TikTok Shop presents an unparalleled opportunity for businesses to reach a massive, engaged audience.

Brands utilizing AI-generated creative are projected to see a 50% increase in engagement and a 35% boost in sales (TikTok, 2025). 🚀

AI-driven content is tailored to resonate with your target audience, ensuring that your brand stands out in a crowded marketplace.

By leveraging AI, you can create compelling, customized experiences that drive more interactions and conversions. 📈



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Instagram, Facebook, and TikTok are the leading platforms for social commerce. 📈

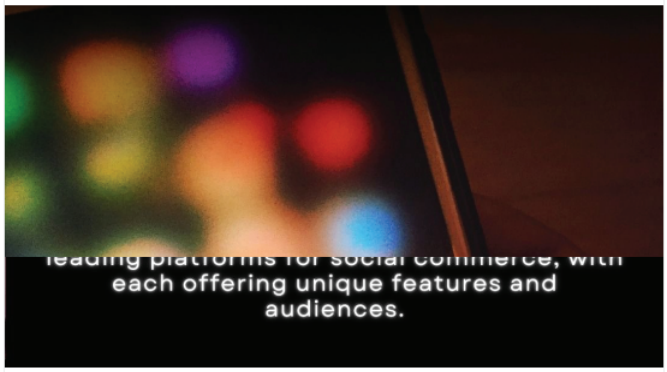
Each of these platforms offers unique features and attracts different audiences, making them powerful tools for your e-commerce business.

Understanding the strengths of each platform can help you tailor your e-commerce strategy to maximize reach and engagement.🚀

Are you taking advantage of these platforms?

Do you want to learn how to use them properly and boost your business?

Just message us 'ECOM'! 🌐



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Imagine reaching 73% more consumers simply by being present on multiple platforms. That's the magic of multichannel e-commerce! 🌐 ✨

By diversifying your sales channels, you not only increase your chances of reaching potential customers but also create a seamless shopping experience.

Whether it's on social media or popular online marketplaces, being everywhere your customers are is key to boosting sales. 📈 🛍️

Start integrating various channels today to boost your brand visibility and drive more conversions. 🔥

Need tips on how to get started? Message us 'ECOM'



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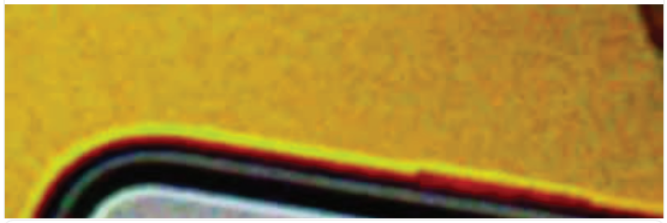
Walmart experienced a 79% increase in online sales last quarter.🚀

Walmart's online marketplace is a goldmine of opportunity, offering acce ...see more



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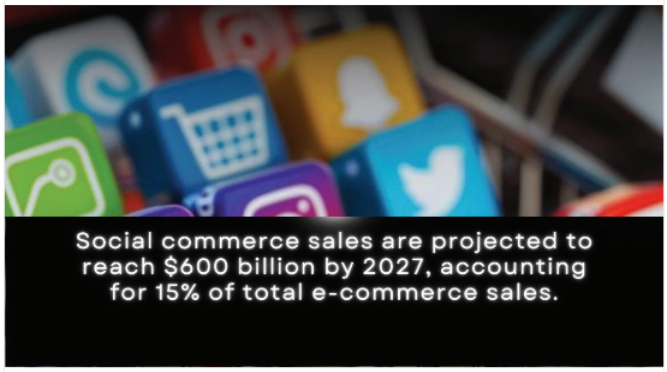
Did you know that social commerce is booming?

It's projected that by 2027, social commerce sales will skyrocket to an astounding $600 billion making up 15% of total e-commerce sales! 🚀

This means that a significant portion of our shopping habits is shifting from traditional online stores to social media platforms.

As we spend more time on these platforms, businesses have a golden opportunity to reach customers in a more personal way. 👏



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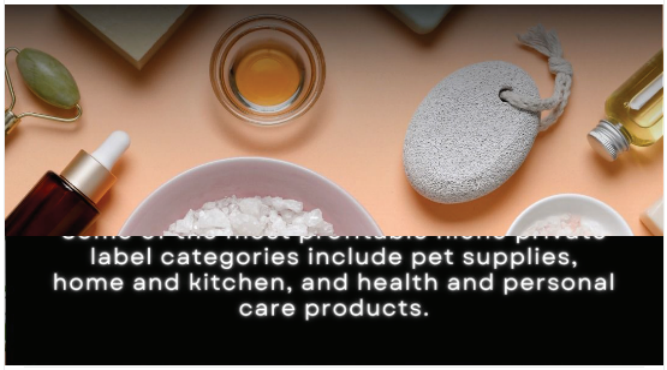
💡 Looking to start a Private Label business?

Some of the most profitable niches you can explore are pet supplies, home and kitchen, and health and personal care products.

These categories are consistently in high demand, making them great choices for budding entrepreneurs!

🔍 Why Private Label? It allows you to create a unique brand identity, have control over product quality, and enjoy better profit margins.

Ready to tap into the Private Label niche? If so, just message us!



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Private Label Branding on Amazon is a lucrative strategy accounting for 59% of Amazon's total sales in 2023. 🔥

...see more



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💡Why Digital Products Are a Game Changer for E-commerce Entrepreneurs💡

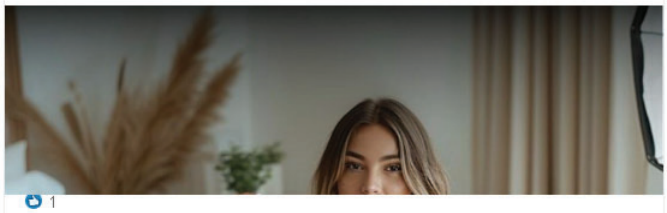
Digital products offer higher profit margins and require no inventory management or shipping.

This makes them a highly lucrative option for anyone looking to start or grow their online business.🚀

For those interested in exploring digital products, there are many options to consider. From e-books and online courses to digital art and software, the possibilities are vast!

Wanna learn more? Just send us a message!

#EcommerceEducation #DigitalSales #BusinessGrowth #Ecommerce #DigitalProducts



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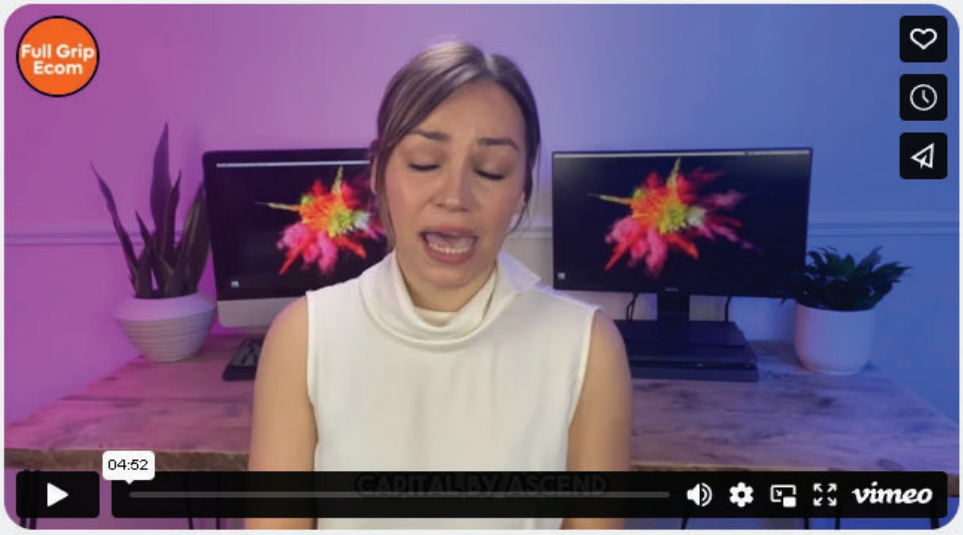
Attachment C

ETHIXCAPITAL

Own A Modern Private Label Amazon Business. Without Managing The Day-To-Day.

Watch this quick video below to see how our amazon stores work and how our team can manage it for you!👇



Book a Consultation

What Will We Discuss On Our Call?

- **Amazon Seller Management:** How it works and how it can benefit you.
- **Partnership:** What it's like to work with us.
- **Expectations:** Realistic outcomes based on current client results and projections.
- **Guarantees:** Detailed explanation of our industry-leading buyback guarantee.
- **Funding:** How we can help you acquire funding for this venture through our funding partners.
- **Visit:** How you can plan a visit to see our operations in action.

Our System

Frequently Asked Questions

- **Lifestyle Business:** Continue working on your main business, job, or retirement without putting time into running operations of this business.
- **Profitable:** As Jeff Bezos continues dominating the e-commerce space, Amazon stores (if managed right) are consistently profitable month-to-month.
- **Built To Scale:** Our manufacturing partners as well as our FBA fulfillment partners and prep center can accommodate 5-15x variances in buying volume (Christmas, Black Friday, Etc).
- **No Warehousing Overhead:** Instead of funding your own e-commerce operation (staff, a facility, fork lifts, etc), you can partner with us, and we'll cover the overhead associated with running a successful logistics operation.
- **Expertise:** We've built, scaled, and sold hundreds of e-commerce businesses over the years. We know what it takes to move mountains in this space.

Questions

What exactly is an Amazon Private Label business?

Simply put, Amazon Private Label is a business model where we (a team of Amazon experts) run and manage an Amazon store for you. We do all the work from finding a winning product idea, manufacturing the product, ordering inventory, scaling, all the way to customer support. All you have to do is fund the operational side of the business while we do all the work!

Am I able to log in to my Amazon Seller account and see how my store is doing?

Yes. You will be able to log in at any time.

Do you have warehouses?

Yes, we have FBA prep and distribution centers in Texas.

How many people work for Ethix?

As of Jan. 2023, we have 296 staff, both domestically and abroad.

How many partners/stores do you have?

We have just over about 800 stores with some partners owning multiple stores.

ETHIXCAPITAL

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Ethix Capital is in no way affiliated, associated, authorized, or endorsed by, or any way officially connected with Amazon INC. No client's success, earnings, or production results should be viewed as typical, average, or expected. Not all clients achieve the same of similar results, due to many factors including, but not limited to, the amount of inventory purchased per month to be sold on your store, margin of products sold, and your results may be higher or lower than those stated in our clients testimonials. This is why we offer a conditional buy back clause described in our service agreements to those that decide to partner with us. Client testimonials are true and accurate statements from actual clients of our combined group of companies, and there are some clients that require us to pay them to speak with other potential clients due to their time constraints. We may offer discounts on store set ups to clients willing to provide these services and other services.

Attachment D

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(electronic filename:
Attachment D - Ethix Capital
Video.mp4)

Attachment E

In the Matter of:

Ascend Ecom

August 16, 2024
ETHIX CAPITAL VIMEO

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P R O C E E D I N G S

- - - - -

ETHIX CAPITAL VIMEO (HAADI)

SOPHIA: Hey, Sophia here with Ethix Capital by Ascend. Thank you for stopping by this page. You probably landed here because you are interested in becoming an Amazon seller, but you don't know where to start, which is great because you also realize there's a lot of time, money, and knowledge required to become a successful Amazon seller. So you're in the right place.

In this quick video, I really want to touch on Ethix and what we can do for you to make you a successful Amazon seller possibly, as well as touch on our unique seller model and money-back guarantee that we have in place to ensure the safety of your investment.

There are three main models of selling on Amazon: Drop-shipping, which is prohibited and will get your store shut down; wholesale FBA, which is allowed but profit margins are relatively low compared to the required capital; and private label, which is what we do here at Ethix.

Amazon private label enables you to sell your own unique trademarked products, removing any

5

competition you would usually have, which in turn increases profit margin and sales tremendously. Essentially, we come in as your operational partners.

We have over 300 employees that are working day-to-day operationally, and our founders, Will and Jeremy, they are the head operators of our Amazon PL Department. They have done over 100 million in sales together on the platform and utilize unique seller strategies that most people don't really know about.

We have a full PPC advertising team, so we can actually help push ads to products and get you more sales, an exceptional listing optimization team, and direct relationships to some of the best manufacturers in the world. So we really have everything from A to Z that it takes to help you become a successful seller on Amazon.

So again, we come in your operational partners. We have a little bit of a profit share on the back end as well, which incentivizes us to help you grow and, ultimately, that helps us grow a portfolio of e-commerce stores horizontally.

People ask us every day, look, why don't you guys just do this for yourself, time and time again. And the answer is, yeah, you can, but you have a certain cap on Amazon. You can't do this hundreds of

6

times yourself. So we are now bringing on partners like yourself and investors who want to own a piece of the Amazon pie, but, again, don't really know where to start.

So you come in. We are your partners. We take a little profit share. It grows our portfolio, and it's a win-win situation.

Now, the cool thing here with Amazon private label financially is this really does outperform -- disclaimer -- it really does outperform a lot of these traditional assets like real estate and stocks, as well as these other methods of selling on Amazon such as drop-shipping and wholesale FBA. And that's what we're doing at Ethix. We are actually trying to help you, as an investor, diversify your portfolio and tap into these new modern-day assets that, you know, cash flow much greater than, again, those traditional types of investments.

For a bit of perspective, take a look at one of our average stores here on this video. As you can see, it did about 12k today, 48k in the last week, and over 200k in the last month, and 1.6 million this year. And, well, the numbers, yeah, they really speak for themselves.

So what I really want you to do is actually

7

have a conversation with our team if this is something that you think you are interested in, and we would love to go over all the financials and really show you what you are looking to expect to make when you open one of these Amazon private label stores with us. Now, it's probably a lot more than you're actually thinking. Again, disclaimer, but we would love to actually have a quick conversation with you and also talk about our money-back guarantee.

Again, our operations team is so confident in being able to provide you real results and sales on these Amazon stores that literally within 36 months when we sign a service agreement, our contract to you, if you do not make your entire investment back, we will actually pay you back the difference to ensure the safety of your investment. It all comes from our confidence and ability to use our strategies with you as a partner. We can also get you working capital right at zero percent interest, and I could just go on and on and on about what we do. But with working capital, we can help obtain a lot more products so that you can sell more volume when it comes to your day-to-day sales.

So what I want you to do at this point, there is a button below, you can actually click it.

8

It's going to take you to a quick 60-second application, just asking a few things about yourself. You know, see if we're a good fit and then you're going to be prompted to actually schedule a call with our team. It's going to be a quick 30-minute call, and we have openings today within the next hour, if that works for you, and we would love to have just a quick conversation, go over the finances, and really break this business model down to show you what to expect partnering with us at Ethix Capital on one of these Amazon private label stores.

All right. So click the button below and we'll see you there.

(End of recording.)

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I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were transcribed; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

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Attachment F

Filed Electronically

(electronic filename:
Attachment F - Will Basta
Podcast.mp4)

Attachment G

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(electronic filename:
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Documentary.mp4)

Attachment H

In the Matter of:

Ascend Ecom

August 16, 2024
NEXUS E-COMMERCE DOCUMENTARY

Condensed Transcript with Word Index

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P R O C E E D I N G S

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NEXUS E-COMMERCE DOCUMENTARY

WILL BASTA: So if you're an entrepreneur, a busy professional or a investor who's looking to get into e-commerce or maybe diversify your portfolio and you're not quite sure maybe how to do it, or you're overwhelmed by the idea, or maybe you're just afraid that you might be losing out on the $5 trillion opportunity that's sitting here right now, if that's you, I made a documentary training for you. And inside this documentary, I'm going to show you how hundreds of our partners and clients have taken a superior approach to e-commerce and built fundamentally sound businesses with a portfolio approach in the e-commerce industry.

Over the course of this documentary, you're going to learn the things to do and the things not to do so you can succeed in the e-commerce industry, or you want to be someone who buys businesses as an investor or a portfolio manager, or maybe you're someone who just reached a success point in their career and wants to diversify and maybe find another opportunity that gives you a little more leverage, a little more freedom. Either way, if this is you, this

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documentary training is going to be the most important thing you watch all quarter.

This is not some drop-shipping video you're going to watch on YouTube or some video on Amazon FBA. What you're about to see is a sophisticated high-level approach done by real business owners who are established and vetted over the last decade. So if you're someone who's serious about e-commerce or you want to take advantage of e-commerce in a serious way, this video you're about to watch will show you exactly how to do that.

So let's begin.

Our clientele is comprised of essentially business professionals, investors, entrepreneurs, people that are trying to tap into another market outside of what they're traditionally doing and they want a partner who they can trust that can build them out a sustainable venture online and turn it into essentially an asset that can appreciate and, at the same time, bring in cash flow month over month.

(Pause)

WILL BASTA: There is -- obviously been a lot of talk of e-commerce over the years. People get hit with ads all the time. They hear things about e-commerce. Some people may have attempted to get

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involved in it and some people may have not, and at the end of the day, what they're concerned about is can this be something that's sustainable and can I trust who -- the partner that I partner with that essentially is taking over 99 percent of the operation.

What is the failure rate, right? Is this a safe opportunity to put my money into? Is this an opportunity that has legs that can actually expand out from this initial step? What's the future of it?

It's who you partner with. If you're giving a large sum of money to an expert in the space to essentially take the reins on the entire operation, there needs to be trust in that partnership. On top of it, you need to see that they've done this before and they have experience, and not only are they experienced, but they're also one step ahead when it comes down to essentially being innovative in the industry, following market trends, consumer markets, essentially platforms that are emerging and markets that are emerging outside of the U.S., because e-commerce is at a global scale.

And so it's not just about how much growth there is in the U.S. It's about how much growth there is globally and what's going to happen in the next

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decade or so. So they want a partner and someone that they can trust that can bring their asset into the future past one year, past two years, past three years, actually building out something that's a sustainable asset that if they want to exit down the line, they have that capability to do so.

MALE SPEAKER: Once the website was launched, they've pretty much managed the business for me and I've been almost completely hands-off. They deal with customer service, shippings, returns. I have clear communication with the team and the team gives me 24-hour-a-day support. My second month alone, I did 60k in revenue.

WILL BASTA: We've seen some patterns over the last ten years in this industry and I'm going to share with you what those are right now.

Yeah, after building, you know, hundreds of successful stores and businesses online for our clients, you know, people -- one thing we've noticed is that people think it's too complex and too sophisticated to get involved in e-commerce and that you'd be successful. The truth is it is very complex; it is very sophisticated. If you're executing this the right way, it can be. But, again, if you're doing it alone and you don't have a partner that is

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established and that has done this for years, right?

And that's what we do for our clients is we take the workload, the complexity, and sophistication, all the doubts about getting involved in e-commerce and diversifying into this asset class away for our clients.

(Pause)

WILL BASTA: One of the main misconceptions and questions we get, which I love to answer, is, is it too saturated? Is the market too saturated in e-commerce to get involved in? And the truth is no, it's not if -- and this is a big if -- if you execute it right and you know what you're doing.

Another misconception that we tend to get a lot is -- is people -- people tend to chase trends, chase platforms at certain times, and they think or they hear from other people in the industry that there's one right way and one platform to be on at a given time, with a certain sourcing and fulfillment model. And the answer is that that's completely false.

So as an organization, we're not platform chasing or trend chasing. We operate out of first principles. We leverage years of data, experience, partnerships that we have on the corporate level and

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everything that we've built in order to build sound fundamental businesses for our clients. And that's what breeds longevity, sustainability in the industry; at the end of the day, long-term results, which in turn not only gives you a portfolio model asset that you're proud of, but it gives you peace of mind knowing that you're selling with a multi-channel approach which mitigates risk across the platform overall.

Choose a partner in this space. Find a partner to execute this for you. And the problem is, yeah, there's a lot of providers out there that provide this service. What matters falls under three different things: Platform, market, and model, and understanding which ones to execute on when, where, and how. And this is why our partnerships and the results that we provide for our clients go so deep because we've been able to execute on this model and, frankly, no one else in this space does it this way. We're the only ones in e-commerce that execute with these three pillars and have the ability to do so both domestically and globally.

We're unique in this industry. There's no one who's doing it the way that we're doing it.

MALE SPEAKER: If you need something,

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they're there for you.

FEMALE SPEAKER: Fundamentally, it really changed my life for the better.

MALE SPEAKER: The buyback guarantee has given me peace of mind.

WILL BASTA: What you invest with us is guaranteed contractually that you're going to make that back or we will buy back your business for the difference. The sooner you get into any kind of business like this, the sooner it's going to flourish, you know, and the sooner you're going to see success.

MALE SPEAKER: The onboarding and the communication has been so positive.

MALE SPEAKER: Everybody was super welcoming.

MALE SPEAKER: Ten out of ten.

WILL BASTA: We have a team that is unparalleled to anyone else in the industry. After the first two weeks and about an hour to two hours of your time and doing some initial housekeeping items, we take the ball and we run with it from there.

Clients from our earlier stage that are still with us exit their businesses, right, and actually sell them as if it's real estate and get a decent exit amount from that. We've seen clients that

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have been able to essentially -- I don't want to say retire early, but a piece of this has been part of their portfolio which has led them and fast-tracked them to where they've wanted to be based on the additional income and money that they've made from this kind of business and revenue.

We've seen people fall in love with e-commerce. They've seen success that we brought them on their business and what we've developed for them in e-commerce, and they've taken that and expanded that out and actually went full-time on their own.

You know, client start-up capital turning into a 5x all the way to them still running and being able to have additional income coming in monthly, which has changed everything they can do from -- maybe it's additional vacations, maybe it's the ability to take more time off from their own work or go on other entrepreneurial journeys when they have this additional revenue coming in.

There's no other provider out there that I know of that has it built the way that we have it built. We have a warehouse that's exclusively ours. We have exclusive relationships with wholesalers all across the country. Feel free to drop by anytime and see the operation in motion.

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So we've seen clients who have had success with us from the beginning stages and that success has turned into them looking at expanding their portfolio with us and going into not just the U.S. market, but expanding into the U.K. market or the EU market or the UAE or Dubai market. We've had clients that have been legacy clients essentially follow our company and our offers and expand when we expand in their own portfolio. Bringing in more income which opens more doors throughout their personal life to, you know, bringing in more income which opens more time capability for them to do other things that they love or other ventures, it's sort of a mix of all of that, or essentially just bringing excitement in because the e-commerce industry is exciting. It's always evolving, has a bright future, and it's never the same as it was the month before.

So that's why, as a company, we're not spinning the same wheel as we are the month before. We're constantly adapting, keeping a traditional approach to what we do, but being innovative at the same time and having that perfect balance, which makes us leaders in the industry and -- and people follow suit with that.

(Pause)

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WILL BASTA: And we have gone global, why we're in four different countries at this point. We've built over 1,000 different e-commerce businesses for our clients and we're constantly expanding, innovating. We've got strategic partners. We're a corporate partner of -- of huge brands in the e-commerce space, which brings obviously a lot of different access points for our clients' businesses that we run for them.

A lot of organizations that, you know, essentially on the surface, everything looks great, but if you lift up the hood or you look behind the door, they have a hollow infrastructure. You know, their team that they may or may not have that's expansive is essentially piecemealed together by a bunch of contractors, which they have no fluidity within their company internally, which obviously has an effect on the relationship they have with their partners in this space. And so these are some of the reasons why a lot of these companies don't last.

It's not just about them providing a service, but can you provide this e-commerce service and build out a business for a client? That's number one. Can you provide good client services, build a relationship with your client? Can you expand upon

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what you've built? Can you scale it? Can you adapt to the actual market? Because we all know the e-commerce market is constantly changing, constantly evolving. There's new platforms out there all the time. There's new ways to reach other consumers. And so you have to constantly, as a provider in the space, be on your toes, be willing to adapt, be willing to look at other avenues for your clients that can bring success and to essentially be ahead of the curve constantly.

And companies get stuck in what we know has worked two years ago and pretty much keep spinning that same wheel and keep doing the same thing and they don't really innovate. There's something to say for innovating, you know, sustainably.

MALE SPEAKER: I was looking for a way to supplement my income in a way that I could still be hands on, but that I was working with the best of the best and professionals who know how to scale an online business.

FEMALE SPEAKER: I've seen the company progress a lot in the last few years and become an industry leader, and I have made well over what I have invested. I've also seen a huge increase in sales since they added their one to two-day shipping

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feature.

WILL BASTA: We have the most unique partnership out there when it comes down to e-commerce and getting involved in this space. And so at the end of the day, you know, we're only going to bring on a limited amount of partners moving forward throughout the next 12 months and throughout the -- this time and just expand upon who we currently have as a client base and grow their portfolios. And so this time right now is the best time, number one, to get involved in e-commerce, because the way the markets are right now and the evolution of where it's came and how we've grown our offering and our partnerships with our clients, this is the culmination of about ten years of experience and aggregate data in e-commerce, bringing the best offers to the table that we've ever had and the best partnership capabilities that we have.

And, of course, with that, we are limiting that to a certain amount of partners that align with what we do and what our vision is long term with the company, as well as with e-commerce in general and how we want to expand our clients' portfolios.

There is a lot of demand in this industry to get involved and our programs and our partnerships are

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super sophisticated and complex. In order to keep quality up and -- and really look at this long term, we limit the amount of clients that we bring on and that limit becoming more and more of a novelty as the time goes and as we grow as an organization.

You have to remember, we've been doing this for close to a half a decade when it comes down to services for clients and partners in this space and we're essentially coming to one of our final intakes of partners for these programs. There is a lot of potential in these programs and there's a lot of market share to be capitalized on for our clients. But at the end of the day, we can't do this for everyone forever. And so we're nearing one of the last chapters when it comes down to bringing on net -- new partners in this particular offer and what this is. And we limit that specifically to keep the quality up in terms of the experience our clients have, but also, you know, in terms of the revenue that we can make for them and, you know, how we can grow their business long-term.

(Pause)

WILL BASTA: So, I mean, I had already been in e-commerce for multiple years at this point. It was an easy choice to be involved in this industry.

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Obviously, remote-based, high margins, the ability to sell to wide consumer markets without being location-dependent and, obviously, something that's growing day-to-day. Even on my side, I began purchasing more online, and with the trend, obviously, you can make more online. More things were coming more available to people to buy online, and the ability to get involved in that, there's obviously a piece of that to capitalize on, right?

And when my business partner and I were working together, we saw -- around circa 2019, we started to see these organizations pop up that were doing it as a service for others, you know, people that essentially want to tap into the marketplace but don't have the time, they just have the money, right? And it seemed like a great business model on the surface, a profit-sharing model, the ability to have a partner that's incentivized, that's an expert, to build and operate a business for you in the digital space.

But what we knew is that the players and the people that were out in the space really, if you peel back the layers, they didn't really have the infrastructure in place. On top of that, you know, we wanted to flip the script on the industry when we came

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in because we wanted to legitimize e-commerce as an offer, really turn -- really turn putting money in e-commerce into an asset class and make it long term. It's not just about cash flowing in the first 30 days, then having a business that fades out in six months or one year and that's not sustainable.

What we began to see and track is different consumer markets, different platforms coming into play, different shopping trends, people purchasing on different platforms for different reasons, and also in different marketplaces as well, sort of coming onto the scene a little bit more, whether it be a TikTok or an Etsy or something like that.

And so the culmination of all of this over the last few years is really starting with a traditional model that worked, that's sustainable, and being the first pioneers in terms of making that a sustainable offer for people in a done-for-you type of service, and evolving that into a multi-channel offer that really touches on all these consumer markets and is really able to capitalize on high-margin opportunity, doesn't -- that's not market-dependent or marketplace-dependent.

You, on the other side of this camera, to pretty much have as much information to be educated in

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your decision-making process on knowing what is the right way and what is the wrong way to approach this industry, if you're looking to tap into -- into e-commerce and you're looking at -- looking at it as a long-term model to not only bring returns early on, but also sustainable returns and have the ability to actually have an asset that appreciates, right, going into the future.

You know, we've got years of manufacturer-distributor network partnerships that we've built. We've got data that we've collected on product research that we've been able to aggregate and leverage on product -- on new product research going into each year and on new different platforms. We have data collected on consumer trends. We have systems in places -- systems in place that we have tested, refined, built upon, and advanced upon year after year after year. And so it's a fine-tuned machine that we've built for our clients over the years and that's essentially where we are today. We are, you know, ten years into e-commerce and about five years into doing this as a service for partners.

If you're still watching this, you're probably wondering who we are and what do we do. Well, we're a full-service global e-commerce

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management firm, and within 90 days, we build, launch, and scale our clients a sustainable long-term, cash-flowing asset on some of the most emerging high-velocity marketplaces in the world.

You're probably wondering how this works. Let me show you how the first 90 days are structured.

(Pause)

FEMALE SPEAKER: I noticed that TikTok shop in the U.K. was really starting to take off. After working with ACV, their team scaled my Etsy shop and created a whole new TikTok shop for me which blew up. Then after six months of trading on these platforms, I can say it's been extremely low-maintenance from me and the stores have started to bring in thousands of pounds each month.

The ACV team cover everything from processing orders, executing marketing strategies, and product sourcing. They even handled all of my customer service stuff, too. So my ROI was around 25 percent on Etsy and 32 percent on TikTok.

Choosing to collaborate with ACV has been an awesome decision for optimizing my income with minimal personal efforts.

MALE SPEAKER: I would say this is about as passive as income could be so far. There hasn't

really been any action for me besides the initial setup, you know. There's a lot of other ways to make money outside of your day job, but I think they would require a lot more hours. I don't see myself putting more than really an hour a week, I mean, if that, just my attention to the app pretty much. But it's pretty much just checking the Amazon seller app and looking at your sales.

Working mechanical engineering job for an aerospace company, I was kind of just looking for a potential second option of income. I didn't have a lot of time after work, so I figured I would try to get involved. And a few months ago, I gave them the initial investment and the Amazon has just kind of started to pick up. So far so good. It's just been really early in the process, but, yeah, it's been good so far.

MALE SPEAKER: These guys make you feel like you're a partner, you're not under them. They respond within the hour for any inquiries. They started the Walmart store in a little over a week. They do tax exemption for you. Everything's taken care of. You have minimum paperwork. Completely hands-off approach.

MALE SPEAKER: So the first three months, I

was running off of my own credit line, which is -- I have good credit for the most part, but I really wasn't properly leveraging it. I wasn't optimizing it whatsoever. So Ascend actually helped me get a business line of credit. About three months in, that's where I started to see the snowball effect. On top of that, I'll never pay for a flight again. To me, that kind of felt like a big turning point.

It was about the three-month mark and just watching it slowly grow.

MALE SPEAKER: Yeah.

MALE SPEAKER: Then, all of a sudden, it's just not so small. For a while now, it's been pretty steady. I've been doing --

MALE SPEAKER: Yeah.

MALE SPEAKER: -- between 18 and 22 percent return every single month, which has been awesome.

(End of recording.)

CERTIFICATE OF TRANSCRIPTIONIST

I, Elizabeth M. Farrell, do hereby certify that the foregoing proceedings and/or conversations were transcribed by me via CD, videotape, audiotape or digital recording, and reduced to typewriting under my supervision; that I had no role in the recording of this material; and that it has been transcribed to the best of my ability given the quality and clarity of the recording media.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were transcribed; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

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Exhibit 30

DECLARATION OF TYLER BROOME

1. My name is Tyler Broome, and I am over the age of eighteen. The following statements are within my personal knowledge.

2. I am a United States citizen. I work as an Investigator for the Federal Trade Commission ("FTC") in the Bureau of Consumer Protection's Division of Marketing Practices. The Division of Marketing Practices investigates persons and entities that may be violating the FTC Act and other laws enforced by the FTC. My office address is 600 Pennsylvania Avenue, NW, CC-8563, Washington, DC 20580.

3. I was assigned to work on the Ascend Ecom LLC matter. The Corporate Defendants in this matter are Ascend Capventures Inc. ("Ascend Capventures"), Ascend Ecommerce Inc. ("Ascend Ecommerce"), Ascend Administration Inc. ("Ascend Administration"), Ascend Ecom LLC ("Ascend Ecom"), and Ascend Distribution LLC ("Ascend Distribution") (collectively "Corporate Defendants"). The Individual Defendants in this matter are William Michael Basta ("Basta") and Jeremy Kenneth Leung ("Leung") (collectively "Individual Defendants"). The Corporate Defendants and Individual Defendants are referred to collectively as "Defendants."

OVERVIEW OF FINDINGS

4. During the course of my investigation, I reviewed documents from various financial institutions, which the FTC received pursuant to Civil Investigative Demands ("CID").

5. All accounts the FTC obtained via CID and that I reviewed were corporate accounts. No personal accounts were included in my review. Table 1 is a summary of the accounts I reviewed:

Table 1

	Financial Institution	Account	Name on Account	Authorized Signer(s)	Address
1	JPMorgan Chase	x8302	Ascend Administration Inc.	William Michael Basta	3240 Professional Dr Auburn, CA 95602 AND [redacted] Miami Beach, FL 33139 *switches from CA to FL address starting 9/30/2023*
2	Bank of America	x2399	Ascend Capventures, Inc	William Michael Basta Jeremy Kenneth Leung	[redacted] Miami Beach, FL 33139
3	JPMorgan Chase	x8792	Ascend Capventures Inc.	William Michael Basta	1309 Coffeen Ave Ste 8847 Sheridan, WY
4	JPMorgan Chase	x7551	Ascend Capventures Inc.	William Michael Basta Jeremy Kenneth Leung	1309 Coffeen Ave Ste 8847 Sheridan, WY AND [redacted] Miami Beach, FL 33139 *switches from CA to FL address starting 9/30/2023*
5	Truist Bank	x3610	Ascend Capventures Inc	*Individuals not listed	1309 Coffeen Ave Ste 8847 Sheridan, WY
6	Truist Bank	x6466	Ascend Capventures Inc	*Individuals not listed	1309 Coffeen Ave Ste 8847 Sheridan, WY
7	Truist Bank	x3629	Ascend Capventures Inc	*Individuals not listed	1309 Coffeen Ave Ste 8847 Sheridan, WY
8	Bank of America	x2412	Ascend Distribution, LLC	William Michael Basta Jeremy Kenneth Leung	[redacted] Miami Beach, FL 33139
9	JPMorgan Chase	x3583	Ascend Distribution, LLC	William Michael Basta Jeremy Kenneth Leung	[redacted] Venice, CA 90291 AND [redacted] Miami Beach, FL 33139 *switches from CA to FL address starting 9/30/2023*
10	JPMorgan Chase	x7352	Ascend Ecom LLC	William Michael Basta Jeremy Kenneth Leung	1309 Coffeen Ave Ste 2784 Sheridan, WY
11	JPMorgan Chase	x1339	Ascend Ecom LLC	William Michael Basta Jeremy Kenneth Leung	1309 Coffeen Ave Ste 2431 Sheridan, WY

12	Bank of America	x6542	Ascend Ecommerce Inc	William Michael Basta Jeremy Kenneth Leung	[redacted] Miami Beach, FL 33139
13	JPMorgan Chase	x7558	Ascend Ecommerce Inc	William Michael Basta Jeremy Kenneth Leung	1309 Coffeen Ave Ste 10354 Sheridan, WY
14	Bank of America	x6349	Global Marketing Development Inc DBA Ascend Capventures	Kristi Crowley	3240 Professional Dr Auburn, CA 95602
15	Bank of America	x0797	Global Marketing Development Inc DBA Ascend Ecom	Kristi Crowley	3240 Professional Dr Auburn, CA 95602
16	Truist Bank	X5230	AC Ventures Global Inc	**Individuals not listed*	1309 Coffeen Ave Ste 12351 Sheridan, WY
17	Truist Bank	X6458	AC Ventures Global Inc	**Individuals not listed*	1309 Coffeen Ave Ste 12351 Sheridan, WY
18	JPMorgan Chase	x9765	Ascend CC Inc	William Michael Basta	3240 Professional Dr Auburn, CA 95602
19	JPMorgan Chase	x5179	Eaglemont Capital	Jeremy Kenneth Leung Gondelino Frias de Guzman	[redacted] Arlington, VA 22203
20	JPMorgan Chase	x0595	Eaglemont Capital	Jeremy Kenneth Leung	[redacted] Arlington, VA 22203
21	JPMorgan Chase	x0975	Mr. Woof, LLC	Jeremy Kenneth Leung	[redacted] Ann Arbor, MI 48104
22	JPMorgan Chase	x8155	Mr. Woof, LLC	Jeremy Kenneth Leung	[redacted] Ann Arbor, MI 48104
23	JPMorgan Chase	x7781	Paradyme Capital Inc	William Michael Basta	3240 Professional Dr Auburn, CA 95602 AND [redacted] Miami Beach, FL 33139 **switches from CA to FL address starting 3/1/2023*
24	JPMorgan Chase	x5326	Paradyme Capital Inc	William Michael Basta	3240 Professional Dr Auburn, CA 95602 AND [redacted] Miami Beach, FL 33139 **switches from CA to FL address starting 3/1/2023*
25	Bank of America	x2360	Paradyme Capital, Inc	William Michael Basta	[redacted] Miami Beach, FL 33139

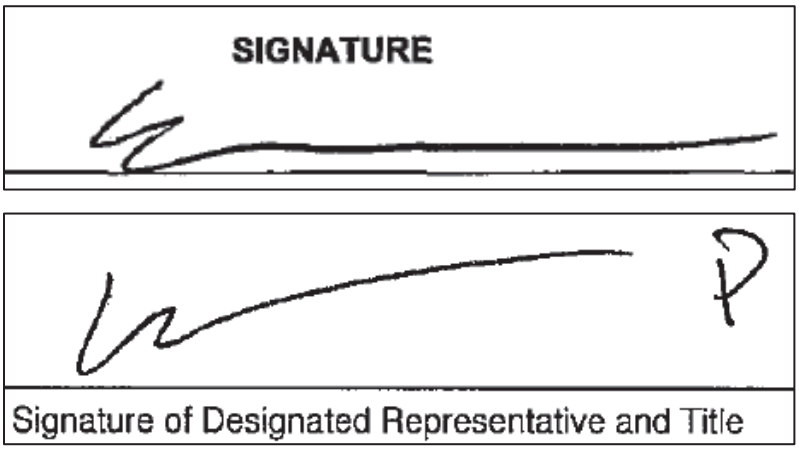
a. While an individual's name was not legibly listed on the Truist Bank ("Truist") signature cards for Ascend Capventures, there are multiple facts that connect Defendant Basta to these accounts.

i. Defendant Basta is an authorized signer on Ascend Capventures accounts at two other financial institutions (Bank of America and JPMorgan Chase ("Chase")).

ii. The address associated with all three Truist accounts for Ascend Capventures is the same as the address listed on the Ascend Capventures accounts with Chase (1309 Coffeen Ave Ste 8847, Sheridan, WY).

iii. The address associated with the Ascend Capventures Bank of America account is a residential address associated with William Michael Basta ([redacted], Miami Beach, FL).

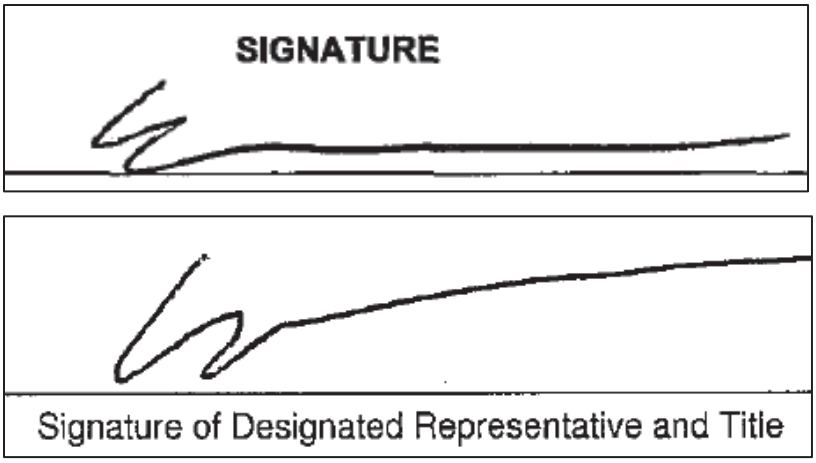
iv. Below is a signature comparison of Chase account 8792 (top) and Truist account 3629 (bottom):



v. The email address noted in the customer information documents provided by Truist for the Ascend Capventures accounts is "will@ascendcapventures.com."

b. While an individual's name was not legibly listed on the Truist signature cards for AC Ventures Global Inc, there are multiple facts that connect Defendant Basta to these accounts.

i. Below is a signature comparison of Chase account 8792 (top) and Truist account 6458 (bottom):



ii. The email address noted in the customer information documents provided by Truist for the AC Ventures Global Inc accounts is "will@ascendcapventures.com."

6. Table 2 includes accounts that were provided by banks in response to Civil Investigative Demands. While analysis of these accounts is not included in this declaration, they are being mentioned to show additional accounts and entities associated with the Defendants.

Table 2

	Financial Institution	Account	Name on Account	Authorized Signer(s)	Address
1	JPMorgan Chase	x2752	Arturo, LLC	Jeremy Kenneth Leung	[redacted] Arlington, VA 22203 AND [redacted] Venice, CA 90291 **switches from VA to CA starting 9/1/2023* AND 1939 N Great Southwest Pkwy Grand Prairie, TX 75050 **switches from CA to TX address starting 9/30/2023*
2	JPMorgan Chase	x9703	Arturo, LLC	Jeremy Kenneth Leung	1309 Coffeen Ave Ste 2578 Sheridan, WY

3	JPMorgan Chase	x0623	Essence & Mar LLC	William Michael Basta	3240 Professional Dr Auburn, CA 95602 AND [redacted] Miami Beach, FL 33139 *switches from CA to FL address starting 9/31/2023*
4	JPMorgan Chase	x9771	Grand B Investments LLC	William Michael Basta Jeremy Kenneth Leung	3240 Professional Dr Auburn, CA 95602 AND [redacted] Miami Beach, FL 33139 *switches from CA to FL address starting 9/31/2023*
5	Bank of America	x1470	Grand B Investments LLC	William Michael Basta Jeremy Kenneth Leung	[redacted] Miami Beach, FL 33139 AND 9901 Brodie Ln Austin, TX 78748 *switches from FL to TX address starting 12/1/2023 and then back to FL address starting February 1, 2024*
6	JPMorgan Chase	x9055	Jaxon LLC	Jeremy Kenneth Leung	120 Madeira Dr NE Ste 220 Albuquerque, NM 87108
7	JPMorgan Chase	x1698	Jetu Wholesale LLC	Jeremy Kenneth Leung	[redacted] Venice, CA 90291
8	JPMorgan Chase	x9219	Lodge Store LLC	Jeremy Kenneth Leung Tung Thanh Nguyen	[redacted] Englewood, CA 80111
9	JPMorgan Chase	x1129	Lodge Store LLC	Jeremy Kenneth Leung	[redacted] Englewood, CA 80111
10	JPMorgan Chase	x3308	Scotch Enterprises, LLC	Jeremy Kenneth Leung	1309 Coffeen Ave Ste 2573 Sheridan, WY 82801
11	JPMorgan Chase	x3008	Scotch Enterprises, LLC	Jeremy Kenneth Leung	1309 Coffeen Ave Ste 2573 Sheridan, WY 82801
12	JPMorgan Chase	x3866	Tap Marketing LLC	William Michael Basta	9901 Brodie Ln Ste 160 1134 Austin, TX 78748
13	JPMorgan Chase	x8566	Tuje Wholesale LLC	Jeremy Kenneth Leung	[redacted] Fort Lauderdale, FL 33308
14	JPMorgan Chase	x5552	Wynton Enterprises, LLC	Jeremy Kenneth Leung	1309 Coffeen Ave Ste 2537 Sheridan, WY 82801

7. Table 3 includes accounts that were provided by financial technology companies in response to Civil Investigative Demands. While analysis of these

accounts is not included in this declaration, they are being mentioned to show additional accounts and entities associated with the Defendants.

Table 3

	Financial Technology Company	Account / Membership #	Name on Account	Individual Defendant Connection	Address
1	Wise US Inc	x6284	381Commerce LLC	Jeremy Kenneth Leung (Signatory)	30 N Gould St Ste 4000 Sheridan, WY 82801
2	Mercury	X915a	89CLTV LLC	William Michael Basta (President)	[redacted] Miami Beach, FL 33139
3	Mercury	Xbb88	AC Ventures Global Inc	William Michael Basta (Team member)	Not Specified
4	Wise US Inc	x9561 *shared with Ascend Distribution, LLC*	AC Ventures Global Inc	Jeremy Kenneth Leung (Company Shareholder and Signatory)	1309 Coffeen Ave Ste 12351 Sheridan, WY 82801
5	Wise US Inc	x0269	AC Ventures LLC	Jeremy Kenneth Leung (Signatory)	[redacted] Davidsonville, MD 21035
6	Wise US Inc	x2924	AC Ventures LLC	William Michael Basta (Signatory)	[redacted] Indianapolis, IN 46220
7	Mercury	x786e	Ace Business Management LLC	William Michael Basta (Team member)	Not Specified
8	Mercury	Xe3db	Ascend Administration Inc	William Michael Basta (Team member)	Not Specified
9	Wise US Inc	x2964	Ascend Capventures Inc	Jeremy Kenneth Leung (Company Director, Shareholder, and Signatory)	1309 Coffeen Ave Sheridan, WY 82801
10	Mercury	X2b52	Ascend Capventures Inc	William Michael Basta (Team member)	Not Specified
11	Wise US Inc	x9561 *shared with AC Ventures Global Inc*	Ascend Distribution, LLC	William Michael Basta (Company Director) Jeremy Kenneth Leung (Company Shareholder)	5900 Balcones Dr Ste 100 Austin, TX 78731
12	Wise US Inc	x0111	Ascend Ecom LLC	Jeremy Kenneth Leung (Company Director, Shareholder, and Signatory)	1309 Coffeen Ave Ste 2784 Sheridan, WY 82801
13	Wise US Inc	x3506	Ascend Ecom LLC	William Michael Basta (Company Director, Shareholder, and Signatory) Jeremy Kenneth Leung (Signatory)	1309 Coffeen Ave Sheridan, WY 82801

14	Wise US Inc	x7804	Ascend Ecommerce Inc	William Michael Basta (Company Shareholder) Jeremy Kenneth Leung (Signatory)	1309 Coffeen Ave Sheridan, WY 82801
15	Mercury	X61d3	Ascend Ecommerce Inc	William Michael Basta (Invited User)	1309 Coffeen Ave Ste 10354 Sheridan, WY 82801
16	Wise US Inc	x3418	E-Selling Solutions LLC	William Michael Basta (Signatory)	5900 Balcones Dr Ste 687 Austin, TX 78731
17	Wise US Inc	x3349	Marigold Group Consulting - FZCO	William Michael Basta (Company Director, Shareholder, and Signatory)	Premises No. DSO-IFZA Premises No. DSO-IFZA, IFZA Properties Dubai United Arab Emirates
18	Wise US Inc	x5196	Mr. Woof, LLC	Jeremy Kenneth Leung (Company Director, Shareholder, and Signatory)	1309 Coffeen Ave Ste 2431 Sheridan, WY 82801
19	Wise US Inc	x5877	Veralma Group LLC	William Michael Basta (Signatory)	30 N Gould St Ste R Sheridan, WY 82801
20	Wise US Inc	x8727	Walzon LLC	Jeremy Kenneth Leung (Signatory)	[redacted] Katy, TX 77494

8. As of May 31, 2024, the end date for documents the FTC received pursuant to Civil Investigative Demands, Ascend Capventures, Ascend Ecommerce, Ascend Administration, and Ascend Distribution had open bank accounts. Ascend Ecom had an active bank account until August 2023 and made a remittance payment via Wise on February 24, 2024.

Estimated Consumer Payments Collected by the Corporate Defendants

9. I estimate that between March 9, 2021, and April 29, 2024, consumer payments made to the Corporate Defendants totaled between $27,907,772.74 and $37,327,916.11.

10. The lower estimate of $27,907,772.74 consists of funds that were deposited directly to a Corporate Defendant's account by means of wire transfer, book transfer, peer-to-peer transfer (e.g. Zelle), personal check, or cashier's check. These transactions often included a direct reference to the entity making the payment (i.e., I was able to determine that an individual or business – a business I believed was controlled by a consumer and made payment for the benefit of that

consumer – was the originator of the payment). For purposes of this summary, I will refer to these types of payments as "direct consumer payments."

11. My methodology for estimating direct consumer payments is as follows: I flagged transactions as a "Consumer Payment" based upon one or more of the following characteristics: a) a transaction descriptor (wire transfer memo, for example) that indicated a transaction was associated with a Corporate Defendant's product or service; b) the originator's name was a known or suspected consumer name or consumer's company's name; or c) the amount paid by the originator matched an amount the FTC understood the Corporate Defendants charged for their fees, product, or services.

12. Direct consumer payments were deposited to several accounts in the names of Ascend Ecom, Ascend Capventures, Ascend Distribution, and Ascend Ecommerce. The most common direct consumer payment amount was $30,000.00, which I observed for 95 unique consumers. The second most frequently occurring amount was $40,000.00, which I observed with 71 unique consumers. In addition, I observed 23 consumers who paid $100,000.00 or more. In total, I estimate that 778 unique consumers made direct payments to the Corporate Defendants, totaling $27,907,772.74. Table 4 shows the accounts that the Corporate Defendants utilized to collect direct consumer payments and the estimated total deposited to each account:

Table 4

Accounts Collecting Consumer Funds	Sum of Credit
Ascend Ecom LLC	**$ 17,618,551.70**
Chase x7352	$ 16,872,812.83
Chase x1339	$ 745,738.87
Ascend Capventures Inc	**$ 10,242,938.51**
Chase x8792	$ 8,951,457.60
Truist x3610	$ 1,267,483.91
Bank of America x2399	$ 23,997.00
Ascend Distribution LLC	**$ 31,814.94**
Chase x3583	$ 31,814.94
Ascend Ecommerce Inc	**$ 14,467.59**
Bank of America x6542	$ 9,898.35
Chase x7558	$ 4,569.24
Grand Total	**$ 27,907,772.74**

13. The higher estimate of $37,327,916.11 includes an additional estimated $9,420,143.37 of financial activity with various merchant accounts associated with the Corporate Defendant accounts. Merchant accounts typically collect payments via electronic payment cards or allow users to make electronic transfers.

14. I am aware that the Corporate Defendants charged consumers fees for inventory and software subscriptions. It is my belief that the merchant accounts described above may have been used to collect those payments. For purposes of this summary, I will refer to these types of transactions as "merchant deposits."

15. I observed merchant activity in accounts held by Ascend Ecom, Ascend Ecommerce, Ascend Capventures, and Ascend Distribution between April

20, 2021, and February 28, 2024. A breakdown of total merchant activity associated with each account is shown in Table 5:

Table 5

Merchant Account	Credits	Debits	Net Merchant Deposits
Ascend Ecom LLC	**$ 6,198,505.68**	**$ 120,643.78**	**$ 6,077,861.90**
Chase x7352	$ 6,196,335.36	$ 109,361.58	$ 6,086,973.78
Chase x1339	$ 2,170.32	$ 11,282.20	$ (9,111.88)
Ascend Capventures Inc	**$ 2,441,457.08**	**$ 2,888.11**	**$ 2,438,568.97**
Chase x7551	$ 1,254,017.55	$ 2,765.42	$ 9,736,912.91
Chase x8792	$ 1,187,439.53	$ 122.69	$ 1,187,316.84
Ascend Distribution LLC	**$ 677,655.78**	**$ 15,854.75**	**$ 661,801.03**
Chase x3583	$ 677,655.78	$ 15,854.75	$ 661,801.03
Ascend Ecommerce Inc	**$ 419,294.37**	**$ 177,382.90**	**$ 241,911.47**
Bank of America x6542	$ 369,138.27	$ 177,382.90	$ 191,755.37
Chase x7558	$ 50,156.10		$ 50,156.10
Grand Total	**$ 9,736,912.91**	**$ 316,769.54**	**$ 9,420,143.37**

Consumer Refund Estimate

16. I estimate the amount of consumer refunds to be approximately $482,760.91, occurring between July 2, 2021, and October 30, 2023. Consumer refunds were issued from the accounts shown in Table 6:

Table 6

Refunds From These Accounts	Amount Refunded
Ascend Ecom LLC	**$ 275,165.76**
Chase x7352	$ 275,165.76
Ascend Capventures Inc	**$ 207,595.15**
Chase x8792	$ 191,235.15
Chase x7551	$ 16,360.00
Grand Total	**$ 482,760.91**

17. I flagged transactions as a "Consumer Refund" if the transaction descriptor made a direct reference to a refund or buyout, or if I recognized a recipient of Corporate Defendant-originated funds to be a consumer who had previously paid the Defendant.

Net Financial Impact to Consumers

18. Taking the direct consumer payments – $27,907,772.74 – less the refunds – $482,760.91 – yields a net direct consumer payment figure of approximately $27,425,011.83.

19. Adding the net merchant deposits – $9,420,143.37 – to the net direct consumer payment figure yields a high-end estimate of net financial impact to consumers by the Corporate Defendants of $36,845,155.20.

Additional Consumer Payments Collected by Related Entities

20. Between August 31, 2022, and January 19, 2024, I estimate that consumers directly paid a total of $1,012,388.55 to accounts held by Global Marketing Development Inc dba Ascend Ecom and Global Marketing Development Inc dba Ascend Capventures (collectively "Global Marketing Development"). I estimate the direct consumer payments to have originated from 27 unique consumers, with individual paid amounts ranging from $4,968.07 to $75,000.00. A breakdown of total estimated direct consumer payments deposited to each account is shown in Table 7:

Table 7

Accounts Collecting Consumer Funds	Sum of Credit
Global Marketing Development Inc DBA Ascend Capventures	**$ 757,420.48**
Bank of America x6349	$ 757,420.48
Global Marketing Development Inc DBA Ascend Ecom	**$ 254,968.07**
Bank of America x0797	$ 254,968.07
Grand Total	**$ 1,012,388.55**

21. In addition, I observed at least two consumers who each made payments to both an account in the name of Global Marketing Development and to an account of the Corporate Defendants.

a. In the first instance, a consumer paid Chase account 7352 (Ascend Ecom) $50,000.00 on June 29, 2022, and then paid Bank of America account 0797 (Global Marketing Development Inc dba Ascend Ecom) $20,000.00 on September 1, 2022.

b. In the other instance, the consumer paid Bank of America account 6349 (Global Marketing Development Inc dba Ascend Capventures) $50,000.00 on July 12, 2023, and then paid Chase account 8792 (Ascend Capventures) $8,000.00 on July 28, 2023.

22. I observed merchant activity in accounts held by Global Marketing Development between November 4, 2022, and March 25, 2024. A breakdown of total merchant activity associated with each account is shown in Table 8:

Table 8

Merchant Account	Credits	Debits	Net Merchant Deposits
Global Marketing Development Inc DBA Ascend Capventures	$ 483,660.03	$ -	$ 483,660.03
Bank of America x6349	$ 483,660.03	$ -	$ 483,660.03
Global Marketing Development Inc DBA Ascend Ecom	$ 312,321.70	$ -	$ 312,321.70
Bank of America x0797	$ 312,321.70	$ -	$ 312,321.70
Grand Total	$ 795,981.73	$ -	$ 795,981.73

23. I did not observe activity indicative of refunds made to consumers from the accounts of Global Marketing Development.

24. Adding the net merchant deposits – $795,981.73 – to the net direct consumer payment figure – $1,021,388.55 – yields a high-end estimate of net financial impact to consumers by Global Marketing Development of $1,808,370.28.

25. Between December 26, 2023, and March 29, 2024, I estimate that consumers directly paid a total of $1,278,485.00 into an account held by AC Ventures Global Inc. I estimate the direct consumer payments to have originated from 40 unique consumers, with individual paid amounts ranging from $15,000.00 to $74,588.00. A breakdown of total estimated direct consumer payments deposited to the account is shown in Table 9:

Table 9

Accounts Collecting Consumer Funds	Sum of Credit
AC Ventures Global Inc	$1,278,485.00
Truist x5230	$ 1,278,485.00
Grand Total	$1,278,485.00

26. I observed one transaction indicative of a consumer refund of $15,422.02, on March 6, 2024. The transaction occurred in Truist account 5230.

27. Taking the direct consumer payments – $1,278,485.00 – less the refunds – $15,422.02 – yields a net financial impact to consumers by AC Ventures Global Inc of approximately $1,263,062.98.

Commingling

28. I estimate the amount commingled among the Corporate Defendants' accounts between November 4, 2021, and April 2, 2024, to be $4,371,044.01. A summary of the amounts transferred among entities is set forth in Table 10, along with the timeframe detail of the financial interactions of each Corporate Defendant (see ¶29).

Table 10

Commingling	Sent	Received
Ascend Ecom LLC	**$ 1,974,907.47**	**$ 1,185,057.05**
Ascend Capventures Inc	$ 3,631.47	$ 1,133,757.05
Ascend Administration Inc	$ 1,107,000.00	$ 50,000.00
Ascend Distribution LLC	$ 864,276.00	$ 1,300.00
Ascend Ecommerce Inc	**$ 233,117.28**	**$ 1.00**
Ascend Capventures Inc	$ 192,900.00	$ 1.00
Ascend Distribution LLC	$ 40,217.28	$ -
Ascend Capventures Inc	**$ 2,029,112.94**	**$ 253,531.47**
Ascend Ecommerce Inc	$ 1.00	$ 192,900.00
Ascend Distribution LLC	$ 746,954.89	$ 57,000.00
Ascend Ecom LLC	$ 1,133,757.05	$ 3,631.47
Ascend Administration Inc	$ 148,400.00	$ -
Ascend Distribution LLC	**$ 63,100.00**	**$ 1,672,254.49**
Ascend Ecom LLC	$ 1,300.00	$ 864,276.00
Ascend Capventures Inc	$ 57,000.00	$ 746,954.89
Ascend Ecommerce Inc	$ -	$ 40,217.28
Ascend Administration Inc	$ 4,800.00	$ 20,806.32
Ascend Administration Inc	**$ 70,806.32**	**$ 1,260,200.00**
Ascend Ecom LLC	$ 50,000.00	$ 1,107,000.00
Ascend Capventures Inc	$ -	$ 148,400.00
Ascend Distribution LLC	$ 20,806.32	$ 4,800.00
Amount Commingled Among Defendant Accounts	**$**	**4,371,044.01**

29. The following is a timeframe detail of the financial interactions of each Corporate Defendant:

a. Between July 3, 2023, and August 11, 2023, Ascend Ecom sent $3,631.47 to Ascend Capventures.

b. Between March 29, 2023, and March 11, 2024, Ascend Capventures sent $746,954.89 to Ascend Distribution.

c. Between November 1, 2023, and April 2, 2024, Ascend Distribution sent $57,000.00 to Ascend Capventures.

d. Between May 16, 2023, and February 2, 2024, Ascend Capventures sent $148,400.00 to Ascend Administration.

e. On July 19, 2023, Ascend Capventures sent $1.00 to Ascend Ecommerce.

f. Between November 2, 2023, and February 23, 2024, Ascend Ecommerce sent $192,900.00 to Ascend Capventures.

g. Between November 17, 2021, and May 24, 2023, Ascend Ecom sent $1,107,000.00 to Ascend Administration.

h. On September 12, 2022, Ascend Administration sent $50,000.00 to Ascend Ecom.

i. Between November 20, 2023, and March 1, 2024, Ascend Ecommerce sent $40,217.28 to Ascend Distribution.

j. Between November 4, 2021, and March 24, 2023, Ascend Ecom sent $864,276.00 to Ascend Distribution.

k. On March 13, 2023, Ascend Distribution sent $1,300.00 to Ascend Ecom.

l. Between December 7, 2022, and November 27, 2023, Ascend Administration sent $20,806.32 to Ascend Distribution.

m. Between November 8, 2023, and January 8, 2024, Ascend Distribution sent $4,800.00 to Ascend Administration.

Sources of Funding of the Corporate Defendants' Accounts

30. The following charts show each account holder's primary sources of income, as a percentage of its total inflows:

a.

ASCEND ADMINISTRATION INC Account Funding Sources	
Commingling	100%
Total	**100%**

b.

ASCEND DISTRIBUTION LLC Account Funding Sources	
Consumer Payment	1%
Merchant Deposits	25%
Commingling	63%
Total	**89%**

c.

ASCEND ECOM LLC Account Funding Sources	
Consumer Payment	65%
Merchant Deposits	23%
Commingling	4%
Total	**92%**

d.

ASCEND ECOMMERCE INC Account Funding Sources	
Consumer Payment	3%
Merchant Deposits	91%
Total	**94%**

e.

ASCEND CAPVENTURES INC Account Funding Sources	
Consumer Payment	66%
Merchant Deposits	16%
Commingling	2%
AC VENTURES GLOBAL INC	5%
Total	**89%**

Tracing Consumer Payments

31. As shown in Table 11, the top 25 entities that received funds from Ascend Ecom ($24,039,443.19) comprise more than 100% of the total estimated amount Ascend Ecom received from consumers ($23,817,057.38).

Table 11

ASCEND ECOM LLC - Outflow Recipients			
	Counterparty		Total Amount Received
1	American Express		$ 5,025,846.36
2	Altitude Financial Inc		$ 3,237,879.75
3	Optimyze Digital LLC		$ 2,919,140.00
4	Wise Inc		$ 1,516,809.73
5	Artisan Living LLC		$ 1,400,000.00
6	Ascend Administration Inc		$ 1,107,000.00
7	Eaglemont Capital		$ 1,036,523.61
8	Commerce A2Z Inc		$ 971,799.20
9	Ascend Distribution LLC		$ 864,276.00
10	Pym LLC		$ 654,584.08
11	Palletfly Com LLC		$ 616,897.84
12	West Coast Escrow		$ 613,950.00
13	Bdo Unibank Inc		$ 612,960.75
14	Paradyme Capital Inc		$ 535,928.75
15	Corporate Benefits Marketing LLC		$ 450,000.00
16	Pubali Bank Limited		$ 359,779.98
17	Ascend Ecom LLC		$ 355,081.01
18	JJC Unlimited		$ 321,467.99
19	Chk 8768 - Owner Unknown		$ 274,631.74
20	Ly Ecom Freedom LLC		$ 254,250.00
21	Nex Deal Distribution Inc		$ 249,757.83
22	Union Bank of The Philippines		$ 224,745.13
23	Bank of The Philippine Islands		$ 177,386.66
24	Security Bank Corporation		$ 138,103.00
25	Stripe		$ 120,643.78
	Top 25 Outflow Recipients Total		$ 24,039,443.19
	Direct Consumer Payments	$17,618,551.70	
	Merchant Deposits	$ 6,198,505.68	
	Total Estimated Amount Received From Consumers		$ 23,817,057.38
	Top Outflow Recipients as a Percentage of Consumer Payments		**101%**

32. As shown in Table 12, the top 20 entities that received funds from Ascend Capventures comprise more than 100% of the total estimated amount Ascend Capventures received from consumers.

Table 12

ASCEND CAPVENTURES INC - Outflow Recipients			
	Counterparty		Total Amount Received
1	Wise Inc		$ 1,945,557.09
2	American Express		$ 1,209,797.53
3	Ascend Ecom LLC		$ 1,133,757.05
4	Altitude Financial Inc		$ 891,827.33
5	381 Commerce LLC		$ 780,000.00
6	Chase Card		$ 774,148.29
7	Ascend Capventures Inc		$ 768,237.71
8	Ascend Distribution LLC		$ 710,954.89
9	Ascend CC Inc		$ 698,706.50
10	Frankstanley		$ 585,643.36
11	Artisan Living LLC		$ 566,827.89
12	Tayn Store LLC		$ 501,000.00
13	Eaglemont Capital		$ 401,264.00
14	Paradyme Capital Inc		$ 345,250.00
15	Walzon LLC		$ 325,749.66
16	Growth Accounts Ltd		$ 292,500.00
17	Admisfits LLC		$ 244,644.00
18	Capital One		$ 236,819.68
19	Scents Corporation		$ 206,959.00
20	JJC Unlimited		$ 158,570.40
21	Ascend Administration Inc		$ 148,400.00
22	Ona Exports LLC		$ 133,001.00
23	Makoline Inc		$ 132,000.00
24	Aison International Group Limited		$ 125,001.00
25	Allegory Consulting Inc		$ 121,266.00
	Top 20 Outflow Recipients Total		$ 12,778,214.38
	Direct Consumer Payments	$10,242,938.51	
	Merchant Deposits	$ 2,441,457.08	
	Total Estimated Amount Received From Consumers		$ 12,684,395.59
	Top Outflow Recipients as a Percentage of Consumer Payments		**101%**

33. As shown in Table 13, the top five entities that received funds from Ascend Distribution comprise over 100% of the total estimated amount Ascend Distribution received from consumers plus the amounts commingled from other Corporate Defendant accounts. I included the amount of commingled funds as this accounts for 63% of all of Ascend Distribution's incoming funds. (The top two overall largest sources of incoming funds to Ascend Distribution are Ascend Ecom and Ascend Capventures, each of which collected millions in consumer payments).

Table 13

	ASCEND DISTRIBUTION LLC - Outflow Recipients		
	Counterparty		Total Amount Received
1	Gusto		$ 1,337,182.93
2	Chase Card		$ 540,327.13
3	Dallas Nlm LL LLC		$ 198,688.02
4	Ascend CC Inc		$ 164,070.37
5	CA Rancho Road LLC		$ 150,164.10
6	Ascend Capventures Inc		$ 57,000.00
7	Australia and New Zealand Banking		$ 33,045.00
8	Mary Leung		$ 22,100.00
9	Jeremy Leung		$ 22,100.00
10	Grand B Investments LLC		$ 17,528.39
11	Ace Business Management LLC		$ 17,426.32
12	Inosio		$ 16,226.55
13	Stripe		$ 15,854.75
14	Bencar Inc		$ 14,255.00
15	Next Insurance		$ 12,510.02
16	Internal Revenue Service		$ 7,077.00
17	Apintego		$ 5,478.67
18	Ascend Administration Inc		$ 4,800.00
19	Sterling Real Estate		$ 3,400.00
20	Bill com LLC		$ 1,749.84
21	Chk 1470 - Owner Unknown		$ 1,600.00
22	Arturo LLC		$ 1,500.00
23	Ascend Ecom LLC		$ 1,300.00
24	Internal Bank		$ 873.00
25	The Guardian		$ 237.35
	Top 5 Outflow Recipients Total		$ 2,390,432.55
	Direct Consumer Payments	$ 31,814.94	
	Merchant Deposits	$ 677,655.78	
	Received Through Commingling	$ 1,612,637.21	
	Total Estimated Amount Received From Consumers		$ 2,322,107.93
	Top Outflow Recipients as a Percentage of Consumer Payments		**103%**

34. As shown in Table 14, the top five entities that received funds from Ascend Ecommerce comprise over 100% of the total estimated amount Ascend Ecommerce received from consumers.

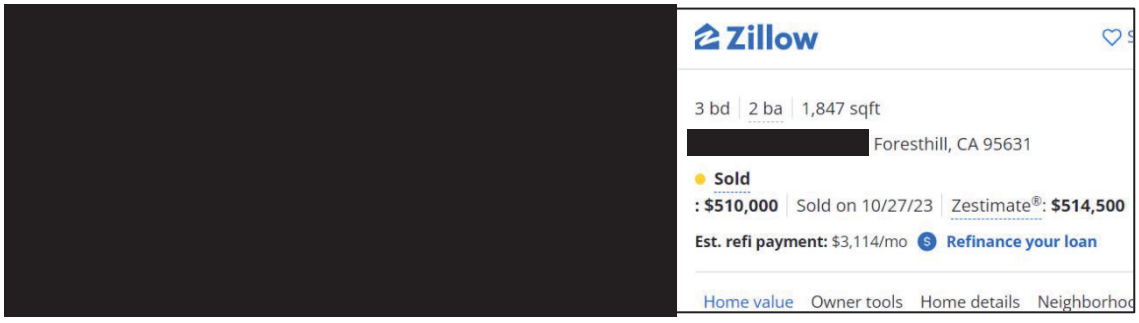
Table 14

	ASCEND ECOMMERCE INC - Outflow Recipients		
	Counterparty		Total Amount Received
1	Ascend Capventures Inc		$ 192,900.00
2	Stripe		$ 177,382.90
3	Ascend Distribution LLC		$ 40,217.28
4	Chk 1470 - Owner Unknown		$ 20,000.00
5	Chk 6833 - Owner Unknown		$ 12,500.00
6	Bencar Inc		$ 8,875.00
7	Ace Business Management LLC		$ 6,000.68
8	Izzan NA		$ 3,967.50
9	Chk 1496 - Owner Unknown		$ 1,000.00
10	Internal Bank		$ 95.00
	Top 5 Outflow Recipients Total		$ 443,000.18
	Direct Consumer Payments	$ 14,467.59	
	Merchant Deposits	$ 419,294.37	
	Total Estimated Amount Received From Consumers		$ 433,761.96
Top Outflow Recipients as a Percentage of Consumer Payments			**102%**

Potential Purchase of Real Estate

35. On May 3 and May 9, 2022, respectively, $36,750.00 and $613,950.00 was transferred by wire from Chase account 7352 (Ascend Ecom) to West Coast Escrow. The mission statement of westcoastescrow.com reads, "To be the trusted partner for the Real Estate industry, adding value at every step of the customer's journey home."

36. On October 26, 2023, $510,000.00 was transferred by wire from Bank of America account 0797 (Global Marketing Development Inc dba Ascend Ecom) to Stewart Title of California with a wire memo listing a street address, "[redacted]" I visited the website Zillow.com on September 5, 2024, and the site stated that this address was last sold on October 27, 2023, for $510,000.00 – see the screenshot below. Placer County property records show that the house is owned by [redacted].



Potential Payroll and Salaries

37. Between November 29, 2021, and May 3, 2024, multiple Corporate Defendant accounts transferred approximately $2,272,511.59 to Gusto. Gusto advertises a platform that "helps growing businesses onboard, pay, insure, and support their hardworking teams with payroll, benefits, and more."

38. On March 15, 2024, Truist account 3610 (Ascend Capventures) transferred $2,400.00 to "Jessica Sijian" with a wire memo reading "contracted services." Multiple consumers who contracted with Corporate Defendants told the FTC that they interacted directly with Jessica Sijan. (The bank records list the last name as "Sijian" while other records indicate the spelling as "Sijan").

39. On March 20, 2024, Truist account 3610 (Ascend Capventures) wired $1,580.00 to Michelle Alzaria with a wire memo reading "sales commission." At least one consumer who contracted with Corporate Defendants told the FTC that they interacted with someone named Michelle.

40. Between September 2, 2022, and March 9, 2023, Alexander Namvari received $39,425.00 from Ascend Ecom, with at least one wire memo reading "commish." Multiple consumers who contracted with Corporate Defendants told the FTC that they interacted directly with Alexander Namvari, or someone named Alex.

Money Sent Internationally

41. Between August 10, 2022, and October 30, 2023, the Corporate Defendants' accounts sent approximately $1,177,708.54 to various banks based in the Philippines. Funds were sent from accounts in the name of Ascend Ecom and Ascend Capventures. Many of these wire transfers include a wire memo of "Salary Payroll" or "Business Expenses." A summary of the funds sent to each recipient from each Corporate Defendant account is shown in Table 15:

Table 15

Philippines	**$**	**1,177,708.54**
Ascend Ecom LLC	**$**	**1,161,628.54**
Bdo Unibank Inc	$	593,085.75
Union Bank of The Philippines	$	222,033.13
Security Bank Corporation	$	137,653.00
Bank of The Philippine Islands	$	176,234.66
Metropolitan Bank & Trust Company	$	16,525.00
China Banking Corp	$	8,766.00
Land Bank of The Philippines	$	2,925.00
Philippine National Bank	$	4,406.00
Ascend Capventures Inc	**$**	**16,080.00**
Bdo Unibank Inc	$	12,880.00
Union Bank of The Philippines	$	3,200.00

42. Between April 9, 2021, and February 21, 2023, Chase account 7352 (Ascend Ecom) wired approximately $394,492.98 to Bangladesh over 33 transactions. The beneficiary bank in every one of these wire transfers was Pubali Bank Limited. In five out of the 33 wire transfers, the beneficiary was specified to be Alamgir Hossen. In many of these wire transfers, the wire memo indicates that the payments are for "business expenses" or "Ascend Ecom Consultancy Expenses." A summary of the funds sent to each recipient from the Corporate Defendant account is shown in Table 16:

Table 16

Bangladesh	**$**	**394,492.98**
Ascend Ecom LLC	**$**	**394,492.98**
Pubali Bank Limited	$	359,779.98
Alamgir Hossen	$	34,713.00

43. I observed three wire transfers to beneficiaries in Hong Kong. These wires occurred between May 16, 2023, and August 21, 2023, and amount to $61,665.00. See Table 17 for the transaction detail for each of the three wires. There are references to "Business Expenses," "Invoice Payment," and "Funding Investments."

Table 17

Bank	Account	Account Name	Posted Date	Description	Debit
JPMorgan Chase	x7352	Ascend Ecom LLC	5/16/2023	Online International Wire Transfer Via: Hsbc Bank USA N A /0108 A/C: Hongkong And Shanghai Banking Corp Hong Kong Ben: International Antiaging Systems Hong Kong Hk Ref **Business Expenses** Ssn: 04W627 Trn	$10,665.00
JPMorgan Chase	x8792	Ascend Capventures Inc	6/20/2023	Online International Wire Transfer Via: Standard Chartered Bank/0256 A/C: Standard Chartered Bank Hong Kong Ben: Aison International Group Limited Hong Kong Hk Ref: **Invoice Payment** Ssn: 0457122 Trn	$ 1,000.00
JPMorgan Chase	x7551	Ascend Capventures Inc	8/21/2023	Online International Wire Transfer Via: Standard Chartered Bank/0256 A/C: Standard Chartered Bank Hong Kong Ben: Aison International Group Limited Hong Kong Hk Ref **Funding Investments** Ssn: 0485056 Trn	$50,000.00

44. I observed three wire transfers to beneficiaries in Vietnam. These wires occurred between February 14, 2023, and August 1, 2023, and amount to $45,000.00. See Table 18 for the transaction detail for each of the three wires. There are references to "Business Expenses" and "Business Travel."

Table 18

Bank	Account	Account Name	Posted Date	Description	Debit
JPMorgan Chase	x7352	Ascend Ecom LLC	2/14/2023	Online International Wire Transfer A/C: Joint Stock Commercial Bank For Hanoi Vietnam Vn Ref: **Business Expenses** Trn	$24,900.00
JPMorgan Chase	x7352	Ascend Ecom LLC	2/14/2023	Online International Wire Transfer A/C: Joint Stock Commercial Bank For Hanoi Vietnam Vn Ref: **Business Expenses** ELECTRONIC Withdrawal	$ 100.00
JPMorgan Chase	x8792	Ascend Capventures Inc	8/1/2023	Online International Wire Transfer A/C: Vietnam Technological And Commerciahanoi Viet Nam 0000 Vn Ref: **Business Travel** Trn	$20,000.00

Quick Money Movement

45. Below are examples of transactions in which consumer money was collected by Corporate Defendant accounts and quickly distributed to other entities, often on the same day. This is not an exhaustive list.

a. On March 22, 2022, Chase account 7352 (Ascend Ecom) received six wire transfers from what appear to be consumers totaling $195,500.00. On this same day, Chase account 7352 sent Optimyze Digital LLC ("Optimyze Digital") $177,125.00 via wire transfer.

b. On May 24, 2022, Chase account 7352 (Ascend Ecom) received two wire transfers from what appear to be consumers totaling $75,000.00 along with a deposit from Stripe (a suspected merchant account) in the amount of $17,938.44. On this same day, Chase account 7352 (Ascend Ecom) transferred $60,000.00 to Chase account 8302 (Ascend Administration) and $24,553.74 to Chase account 8768 (this account owner is unknown). The balance in Chase account 7352 (Ascend Ecom) prior to the received wire transfers and Stripe deposit was approximately $23,068.37; therefore, the outgoing transfers that were made on this day would not have been possible without the incoming funds.

c. On January 5, 2023, Chase account 7352 (Ascend Ecom) received three wire transfers from what appear to be consumers totaling $95,000.00. On this same day, Chase account 7352 (Ascend Ecom) transferred $25,000.00 to Chase account 3583 (Ascend Distribution), $40,374.54 to Chase account 5179 (Eaglemont Capital), and $8,750.00 to Alexander Namvari. (Defendant Leung is an authorized signer for two Chase Bank accounts held by Eaglemont Capital, see Table 1.)

d. On January 19, 2023, Chase account 7352 (Ascend Ecom) received a wire transfer from what appears to be a consumer in the amount $50,000.00. On this same day, Chase account 7352 (Ascend Ecom) transferred $40,911.06 to Chase account 5179 (Eaglemont Capital).

e. On May 16, 2023, Chase account 8792 (Ascend Capventures) received four wire transfers from what appear to be consumers totaling $123,880.00. On this same day, Chase account 8792 (Ascend Capventures) transferred $70,000.00 to Chase account 1339 (Ascend Ecom), $30,000.00 to Chase account 3583 (Ascend Distribution), and $10,000.00 to Chase account 8302 (Ascend Administration).

Additional Notable Transfers

46. On August 3, 2023, and September 22, 2023, wire transfers were made from Chase account 3583 (Ascend Distribution) made payable to [redacted], totaling $55,145.00. It is my understanding that Individual Defendant Leung's mother's name is [redacted]. Both wires were sent through Australia and New Zealand Banking Group Limited.

a. As shown in Table 19, two accounts in the name of Eaglemont Capital wired $81,500.00 over four transactions. The beneficiaries of these wires were "Dr [redacted] Mrs [redacted]." Defendant Leung is an authorized signer on these Eaglemont Capital accounts.

Table 19

Bank	Account	Account Name	Posted Date	Description	Debit
JPMorgan Chase	x0595	Eaglemont Capital	2/22/2023	Online International Wire Transfer A/C: Australia And New Zealand Banking Melbourne Vic Australia 3000 Au Ben:/505097856 DR [redacted] [redacted] Mrs [redacted] Ref: Gift OR Donation Trn	$ 9,000.00
JPMorgan Chase	x0595	Eaglemont Capital	3/28/2023	Online International Wire Transfer A/C: Australia And New Zealand Banking Melbourne Vic Australia 3000 Au Ben:/505097856 DR [redacted] [redacted] Mrs [redacted] Ref: Business Expenses Trn	$ 7,500.00
JPMorgan Chase	x5179	Eaglemont Capital	5/17/2023	Online International Wire Transfer A/C: Australia And New Zealand Banking Melbourne Vic Australia 3000 Au Ben:/505097856 DR [redacted] [redacted] Mrs [redacted] Ref: Personal Expenses Trn	$15,000.00
JPMorgan Chase	x5179	Eaglemont Capital	6/9/2023	Online International Wire Transfer A/C: Australia And New Zealand Banking Melbourne Vic Australia 3000 Au Ben:/505097856 DR [redacted] [redacted] Mrs [redacted] Ref: Personal Expenses	$50,000.00

b. An additional $75,000.00 was sent to an unspecified beneficiary at Australia and New Zealand Banking Group Limited over four transactions. Three of these wires originated from an account in the name of Eaglemont Capital and the other originated from Chase account 7352 (Ascend Ecom). These transactions are shown in Table 20.

Table 20

Bank	Account	Account Name	Posted Date	Description	Debit
JPMorgan Chase	x5179	Eaglemont Capital	12/30/2021	Online International Wire Transfer A/C: Australia And New Zealand Banking Richmond Vic Australia 3121 Au Ref: **Personal Expenses** Trn	$ 5,000.00
JPMorgan Chase	x5179	Eaglemont Capital	2/23/2022	Online International Wire Transfer A/C: Australia And New Zealand Banking Richmond Vic Australia 3121 Au Ref: **Business Expenses** Trn	$25,000.00
JPMorgan Chase	x7352	Ascend Ecom LLC	3/4/2022	Online International Wire Transfer A/C: Australia And New Zealand Banking Richmond Vic Australia 3121 Au Ref: **Education Expenses** Trn	$20,000.00
JPMorgan Chase	x5179	Eaglemont Capital	3/10/2022	Online International Wire Transfer A/C: Australia And New Zealand Banking Richmond Vic Australia 3121 Au Ref: **Loan Repayment** Trn	$25,000.00

c. Across all analyzed accounts, the only specified beneficiaries that received wire transfers through Australia and New Zealand Banking Group Limited were [redacted] and "Dr [redacted] Mrs [redacted]."

47. Between May 30, 2023, and August 14, 2023, Ascend Ecom and Ascend Capventures sent a combined $108,000.00 to AUTOMATORS LLC. (The FTC sued Automators LLC in 2023 for running a business opportunity scheme. *FTC v. Automators LLC*, No. 23-cv-01444-BAS (S.D. Cal. Aug. 8, 2023). These transactions are shown in Table 21.

Table 21

Bank	Account	Account Name	Posted Date	Description	Debit
JPMorgan Chase	x1339	Ascend Ecom LLC	5/30/2023	Online Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: **Automators LLC** Las Vegas NV 89102 US Ref:/Time/04:00 Imad: 0530B1Qgc08C004705	$21,500.00
JPMorgan Chase	x8792	Ascend Capventures Inc	6/29/2023	Online Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: **Automators LLC** Las Vegas NV 89102 US Ref:/Time/03:36 Imad: 0629B1Qgc01C000961	$45,000.00
JPMorgan Chase	x8792	Ascend Capventures Inc	8/14/2023	Online Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: **Automators LLC** Las Vegas NV 89102 US Ref:/Time/03:48 Imad: 0814B1Qgc08C003947 Trn	$41,500.00

48. Between April 28, 2021, and January 18, 2023, Chase account 7352 (Ascend Ecom) transferred $2,919,140.00 to Optimyze Digital. On June 11, 2021,

and August 2, 2021, Optimyze Digital made transfers to Chase account 7352 (Ascend Ecom) totaling $25,000.00.

49. Between May 24, 2021, and January 12, 2024, I estimate that $4,200,757.31 was transferred among accounts of entities related to the Corporate Defendants. A summary of the amounts transferred among entities is summarized in Table 22.

Table 22

Commingling	Sent	Received
Ascend Capventures Inc	**$ 1,496,022.40**	**$ 2,667.00**
Mr Woof LLC	$ 3,301.90	$ 2,667.00
Paradyme Capital Inc	$ 345,250.00	$ -
Ascend CC Inc	$ 698,706.50	$ -
Eaglemont Capital	$ 401,264.00	$ -
Global Marketing Development Inc	$ 47,500.00	$ -
Global Marketing Development Inc	**$ 380,000.00**	**$ 47,500.00**
Ascend Capventures Inc	$ -	$ 47,500.00
Paradyme Capital Inc	$ 150,000.00	$ -
Eaglemont Capital	$ 230,000.00	$ -
Paradyme Capital Inc	**$ 298,316.48**	**$ 1,127,344.75**
Ascend Ecom LLC	$ -	$ 535,928.75
Ascend Capventures Inc	$ -	$ 345,250.00
Global Marketing Development	$ -	$ 150,000.00
Ascend CC Inc	$ 25.00	$ -
Eaglemont Capital	$ 298,291.48	$ 96,166.00
Eaglemont Capital	**$ 96,166.00**	**$ 1,966,079.09**
Ascend Ecom LLC	$ -	$ 1,036,523.61
Ascend Capventures Inc	$ -	$ 401,264.00
Paradyme Capital Inc	$ 96,166.00	$ 298,291.48
Global Marketing Development Inc	$ -	$ 230,000.00
Ascend Administration Inc	**$ 100.00**	**$ -**
Ascend CC Inc	$ 100.00	$ -
Mr Woof LLC	**$ 7,067.00**	**$ 79,370.60**
Ascend Ecom LLC	$ 4,400.00	$ 76,068.70
Ascend Capventures Inc	$ 2,667.00	$ 3,301.90
Ascend Ecom LLC	**$ 1,759,015.06**	**$ 4,400.00**
Mr Woof LLC	$ 76,068.70	$ 4,400.00
Ascend CC Inc	$ 110,494.00	$ -
Eaglemont Capital	$ 1,036,523.61	$ -
Paradyme Capital Inc	$ 535,928.75	$ -
Ascend Distribution LLC	**$ 164,070.37**	**$ -**
Ascend CC Inc	$ 164,070.37	$ -
Ascend CC Inc	**$ -**	**$ 973,395.87**
Ascend Capventures Inc	$ -	$ 698,706.50
Ascend Distribution	$ -	$ 164,070.37
Ascend Ecom LLC	$ -	$ 110,494.00
Ascend Administration Inc	$ -	$ 100.00
Paradyme Capital Inc	$ -	$ 25.00
Amount Transferred Amongst Related Entity Accounts	**$ 4,200,757.31**	

Corporate Defendants' Assets

50. Between November 9, 2022, and August 9, 2023, Chase account 8302 (Ascend Administration) paid "Porsche" or "Porsche Financia" approximately $22,511.17. Each payment was for the same amount – $2,046.47 – and all payments except one were spaced one month apart.

51. On December 8, 2021, and January 31, 2022, two wire transfers were made from Chase account 7352 (Ascend Ecom) made payable to Charles Schwab, totaling $30,100.00. Both wires include a note indicating that the payments are "for further credit to Jeremy Leung." The beneficiary account type (business or personal) is currently unknown.

52. The most recently analyzed and available statements for the Corporate Defendants' accounts listed in Table 1 carried a total balance of $23,155.51.

53. The most recently analyzed and available statements for the Global Marketing Development accounts (Bank of America accounts 6349 and 0797) carried a total balance of $89,657.28.

54. The most recently analyzed and available statements for Ascend CC Inc, Eaglemont Capital, Mr. Woof, LLC, Paradyme Capital Inc listed in Table 1 all carried balances of $0.00.

55. The most recently analyzed and available statements for the accounts listed in Table 2 carried a total balance of $144,820.39.

56. The most recently analyzed and available statements for the accounts listed in Table 3 carried a total balance of $80,456.97.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 5, 2024 at Washington, D.C.

Tyler Broome

Exhibit 31

DECLARATION OF TYLER BROOME

1. My name is Tyler Broome, and I am over the age of eighteen. The following statements are within my personal knowledge.

2. I am a United States citizen. I work as an Investigator for the Federal Trade Commission ("FTC") in the Bureau of Consumer Protection's Division of Marketing Practices. The Division of Marketing Practices investigates persons and entities that may be violating the FTC Act and other laws enforced by the FTC. My office address is 600 Pennsylvania Avenue, NW, CC-8563, Washington, DC 20580.

3. On March 1, 2024, I captured a YouTube video featuring Asante Monadjemi, the Founder & COO of Optimyze Digital, and Christopher O'Byrne, the Financial Consultant & Strategist of Optimyze Digital. **Attachment A** is a true and correct copy of the recording of the video. In the video, Monadjemi states, "We just landed here in Dallas. We're really excited because we're with our partner at Ascend eCom and we're going to be showing their new facility." *See* **Attachment A** at 00:02 to 00:07. The video identifies Jeremy Leung as the Founder & COO of Ascend eCom and shows Leung giving Monadjemi and O'Byrne a tour of Ascend eCom's Dallas area warehouse. *See* **Attachment A** at 00:12 to 00:26. **Attachment B** is a true and correct copy of screenshots captured from the video with annotations of the time markers at which the screenshots were taken.

4. On March 1, 2024, I also captured a YouTube video that appears to be jointly published by Optimyze Digital and Ascend Ecom. **Attachment C** is a true and correct copy of the recording of the video. The video shows Monadjemi, O'Byrne, and Leung but does not identify them. *See* **Attachment C** at 00:03 and 00:33. The video features James, a purported Amazon store owner and client of Ascend Ecom, in what appears to be the warehouse featured in the video described in paragraph 3 above. *See* **Attachment C** at 00:08. In the video, James shows

products to Monadjemi and O'Byrne and claims to have a "private label" with Ascend Ecom. *See* **Attachment C** at 00:03 to 00:04. He also claims that before joining Ascend, his average revenue was $5,000 a month, but with Ascend, he has increased that number to $200,000 a month. *See* **Attachment C** at 00:20 to 00:30. James flashes a cellular telephone's screen at the camera, showing what appears to be an Amazon seller account's performance with more than $15,000 in sales in one day. *See* **Attachment C** at 00:28 to 00:31. Leung hands a cellular telephone to James that appears to show an Amazon seller's account's performance. *See* **Attachment C** at 00:32 to 00:34. **Attachment D** is a true and correct copy of screenshots captured from the video with annotations of the time markers at which the screenshots were taken.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2024 at Washington, D.C.

Tyler Broome

Attachment A

Filed Electronically

(electronic filename:
Attachment A - Optimyze – Ascend Video – Dallas Warehouse.mp4)

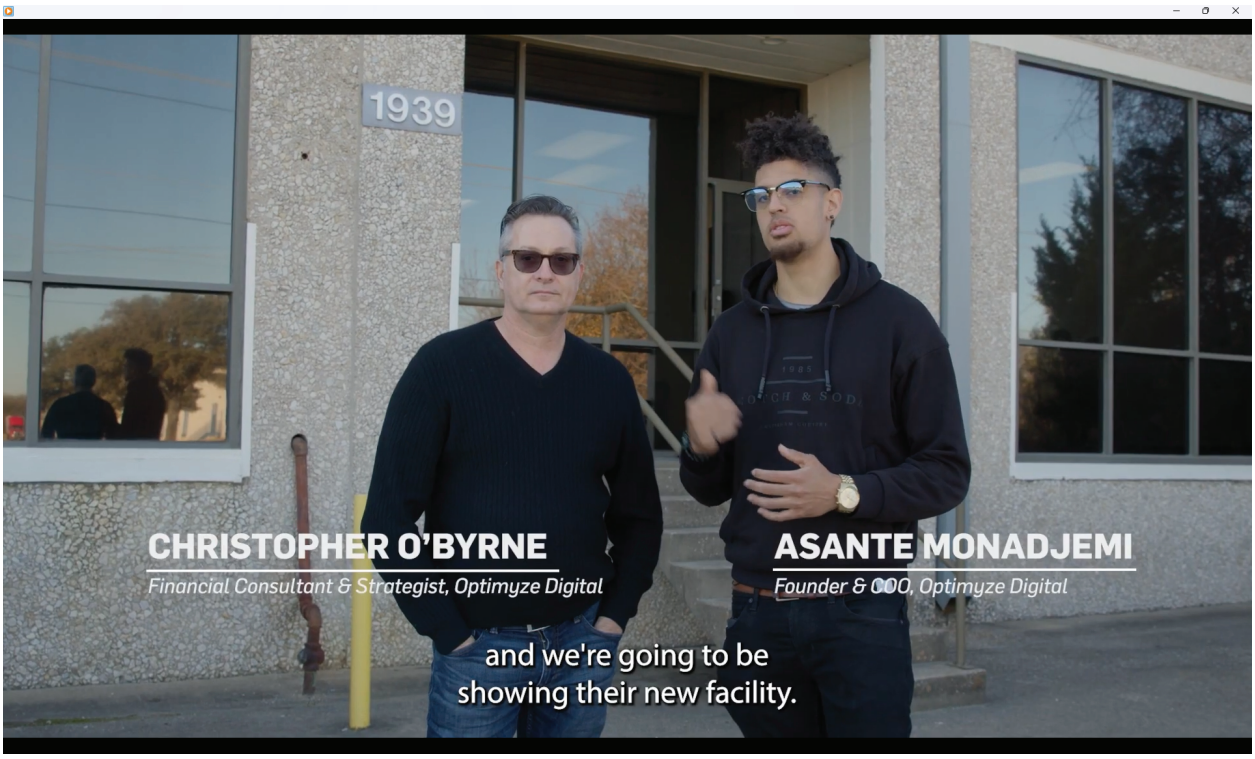
Attachment B



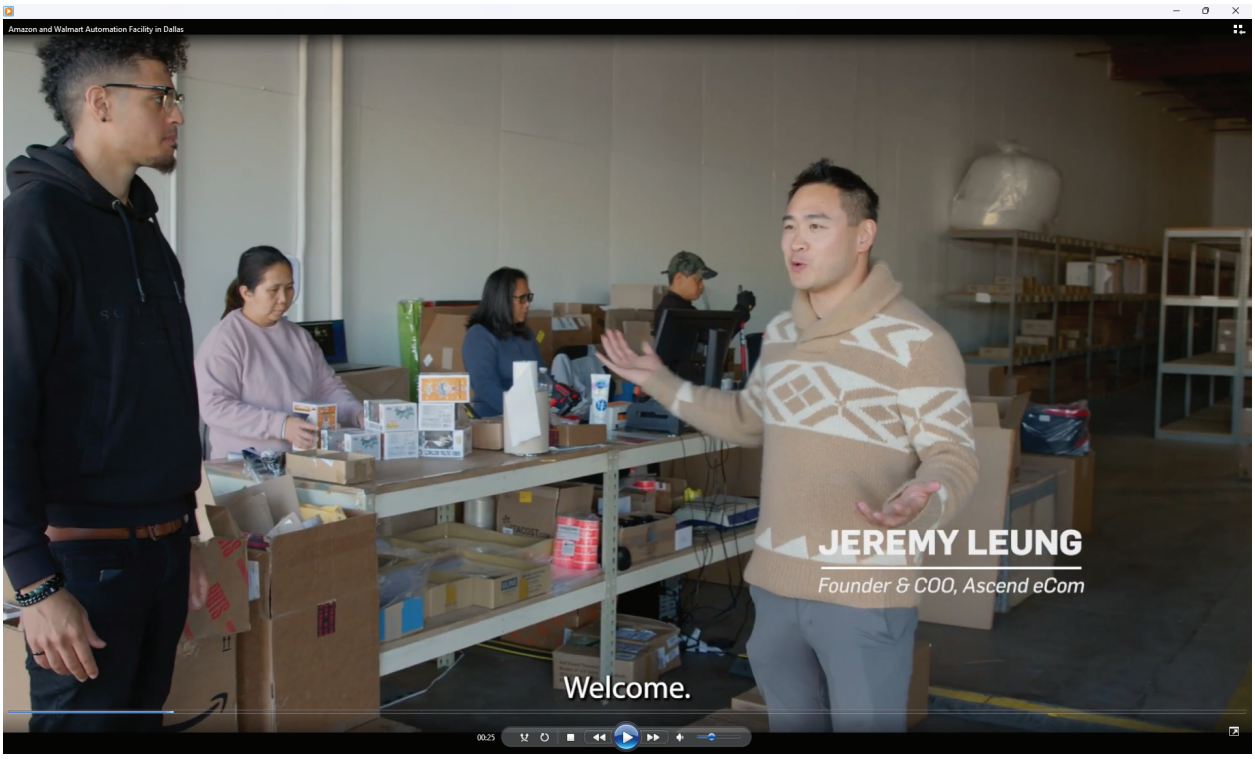
00:01 of the video



00:04 of the video



00:06 of the video



00:25 of the video