UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 19-Civ-25046-SCOLA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ON POINT GLOBAL, LLC, *et al.*,

Defendants.

PLAINTIFF FEDERAL TRADE COMMISSION'S NOTICE OF FILING EXHIBITS IN SUPPORT OF THE FTC'S MOTION FOR SUMMARY JUDGMENT AND IN OPPOSITION TO CERTAIN DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Table of Exhibits[1]

Plaintiff's Exhibit (PX) No.	Description
1	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through BJ
2	Declaration of Federal Trade Investigator Roberto C. Menjivar
3	Expert Report of Dr. Michelle Mazurek, with Attachments 1 through 10
4	Declaration of Thomas Van Wazer, Federal Trade Commission Forensic Accountant
5	Declaration of Federal Trade Commission Data Analyst Amanda Wilson, with Attachments A through E
6	Declaration of Christopher Hundycz, Federal Trade Commission Visual Information Specialist, with Attachments A through C
7	Declaration of Martin Elliott, Visa, Inc.
8	Documents Produced by the Financial Crimes Enforcement Network
9	Documents Produced by Commercial Mail Receiving Agencies, with Attachments A through N
10	Documents Produced by the United States Postal Service, with Attachments A through C
11	Documents Produced by Payment Processors, with Attachments A through G
12	Documents Produced by Banks Holding Depository Accounts, with Attachments A through F
13	October 15, 2015 Compliance Report of Burton Katz in *FTC v. Acquinity Interactive, LLC, et al.*, Case No. 14-60166-Civ-SCOLA (S.D. Fla.)
14	Declaration of Barbara Brown, with Attachments 1 through 6
15	Declaration of David Duntley, with Attachment A
16	Declaration of Justin Rutledge, with Attachments A and B
17	Declaration of Thomas Lassanske, with Attachment A
18	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through D
19	Declaration of Receiver Melanie Damien
20 - 22	[Intentionally omitted from this filing]
23	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through C
24	Supplemental Declaration of Receiver Melanie Damien
25	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through AB
26	Declaration of Federal Trade Digital Investigative Analyst Daniel Gillenwater
27 - 31	[Intentionally omitted from this filing]

[1] Plaintiff FTC has consecutively numbered all of its exhibits starting with those filed with the Plaintiff's Motion for Temporary Restraining Order (ECF 4). Plaintiff is refiling nearly all of its previously-filed exhibits for ease of reference.

32	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through I
33	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A though CD[2]
34	Declaration of Federal Trade Commission Attorney Sarah Waldrop, with Attachments A through O, which were produced
35	Declaration of Federal Trade Commission Attorney Sarah Waldrop, with Attachments A through O[3]
36 - 39	[Intentionally omitted from this filing]
40	Initial Disclosures of Burton Katz, Brent Levison, Elisha Rothman, and Christopher Sherman
41	Brent Levison's Answers to Federal Trade Commission's First Set of Interrogatories
42	Elisha Rothman's Answers to Federal Trade Commission's First Set of Interrogatories
43 - 44	[Intentionally omitted from this filing]
45	April 16, 2021 Compliance Report of Burton Katz in *FTC v. Acquinity Interactive, LLC, et al.*, Case No. 14-60166-Civ-SCOLA (S.D. Fla.)
46	Transcript of Preliminary Injunction Hearing held on January 13, 2020
47	Defendant Dragon Global Management LLC's Responses and Objections to Plaintiff FTC's First Set of Interrogatories
48	Transcript of Preliminary Injunction Hearing held on January 10, 2020
49	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through HR
50	Declaration of Federal Trade Commission Attorney Sarah Waldrop, with Attachments A through V, which were produced to the FTC
51	[Redacted version previously filed at ECF 437 and omitted from this filing] Declaration of Federal Trade Commission Attorney Sarah Waldrop, with Attachments A through AQ, which were produced to the FTC and marked confidential[4]
52	Excerpt of the Deposition of Burton Katz
53	Excerpt of the Deposition of Robert Zangrillo
54	Excerpt of the Deposition of Brent Levison
55	Excerpt of the Deposition of Elisha Rothman
56	Excerpt of the Deposition of Christopher Sherman
57	Excerpt of the Deposition of Arlene Mahon
58	Burton Katz's Answers to Plaintiff FTC's First Set of Interrogatories
59	Robert Zangrillo's Responses and Objections to Plaintiff FTC's First Set of Interrogatories
60	Christopher Sherman's Answers to Plaintiff FTC's First Set of Interrogatories

[2] Attachments H, I, BE, BF, and BG to PX33 were intentionally omitted.
[3] Attachment S to PX35 was intentionally omitted.
[4] Attachment D to PX51 was intentionally omitted.

61	Arlene Mahon's Answers to Plaintiff FTC's First Set of Interrogatories
62	Waltham Technologies LLC's Answers to Plaintiff FTC's First Set of Interrogatories
63	Corporate Defendants' Answers to Burton Katz's First Set of Interrogatories and Exhibit D to that response
64	Declaration of Federal Trade Commission Data Analyst Elizabeth Anne Miles
65	Declaration of Federal Trade Digital Investigative Analyst Daniel Gillenwater
66	Declaration of Technical Computer Forensic Examiner Richard Kaplan
67	Declaration of Burton Katz, filed in *FTC v. Acquinity Interactive, LLC, et al.*, No. 0:14-cv-60166, ECF 160-1 (Katz Declaration)
68	Declaration of Elisha Rothman, filed in *FTC v. Acquinity Interactive, LLC, et al.*, No. 0:14-cv-60166, ECF 160-2
69	Declaration of Brent Levison, filed in *FTC v. Acquinity Interactive, LLC, et al.*, No. 0:14-cv-60166, ECF 160-4
70	Email correspondence from Megan Black, filed in *FTC v. Acquinity Interactive, LLC, et al.*, No. 0:14-cv-60166, ECF 163-24
71	Corporate Defendants' Answers to Plaintiff FTC's Second Set of Interrogatories and Exhibit B to that response
72	Affidavit of Duncan Hall, Archive.org with Exhibits A and B
73	[Intentionally left blank]
74	Declaration of Receiver Melanie Damien, with Exhibits A through G
75	Declaration of Federal Trade Investigator Lashanda Freeman, with Attachments A through K
76	Declaration of Federal Trade Commission Attorney Sarah Waldrop, with Attachment A
77	Declaration of Federal Trade Commission Attorney Sarah Waldrop, with Attachment A, which was produced to the FTC and marked confidential – to be filed under temporary seal upon the Court's leave

Dated: June 28, 2021

Respectfully submitted,

/s/ Sana Chaudhry
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CERTIFICATE OF SERVICE

I hereby certify that, on June 28, 2021, a true and correct copy of the foregoing was served on all counsel of record via CM/ECF.

/s/ Sana Chaudhry
Sana Chaudhry