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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,  
Plaintiff,

v.

BCO CONSULTING SERVICES,  
INC., a California corporation,  
SLA CONSULTING SERVICES,  
INC., a California corporation,  
GIANNA OLILANG, individually and  
as an officer of BCO Consulting  
Services, Inc., and SLA Consulting  
Services, Inc.,  
BRANDON CLORES, individually and  
as an officer of BCO Consulting  
Services, Inc.,  
KISHAN BHAKTA, individually and  
as an officer of BCO Consulting  
Services, Inc.,  
ALLAN RADAM, individually and as  
an officer of SLA Consulting  
Services, Inc.

Defendants.

Case No. 8:23-cv-0699-JWH-ADS

ORDER ENTERING  
STIPULATION FOR PERMANENT  
INJUNCTION, MONETARY  
RELIEF, AND OTHER RELIEF AS  
TO BRANDON CLORES, KISHAN  
BHAKTA, AND BCO  
CONSULTING SERVICES, INC.

1 Plaintiff, the Federal Trade Commission (the "FTC"), filed its  
2 Complaint for Permanent Injunction, Monetary Relief, and Other Relief  
3 ("Complaint") pursuant to Sections 13(b) and 19 of the Federal Trade  
4 Commission Act (the "FTC Act"), 15 U.S.C. §§ 53(b) and 57b, the  
5 Telemarketing and Consumer Fraud and Abuse Prevention Act (the  
6 "Telemarketing Act"), and Section 522(a) of the Gramm-Leach-Bliley Act (the  
7 "GLB Act"), 15 U.S.C. § 6822(a). The FTC and Defendants Brandon Clores,  
8 Kishan Bhakta, and BCO Consulting Services, Inc. (collectively, the "Settling  
9 Defendants") stipulate to the entry of the concurrently lodged [Proposed]  
10 Stipulated Order for Permanent Injunction, Monetary Relief, and Other Relief  
11 (the "Order") to resolve all matters in dispute in this action between them.

#### 12 I. FINDINGS

13 Therefore, good cause appearing, the Court hereby makes the following  
14 FINDINGS:

15 A. This Court has jurisdiction over this matter.

16 B. The Complaint charges that Defendants participated in deceptive  
17 acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 13.163 07.176

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b. to negotiate, obtain, or arrange a modification, or renegotiate, settle, reduce, or in any way alter any terms of the mortgage, loan, debt, or obligation, including a reduction in the amount of interest, principal balance, monthly payments, or fees owed by a person to a secured or unsecured creditor or debt collector;

c. to obtain any forbearance or modification in the timing of payments from any secured or unsecured holder or servicer of any mortgage, loan, debt, or obligation;

d. to negotiate, obtain, or arrange any extension of the

1 The foregoing shall include any manner of claimed assistance, including  
2 auditing or examining a person's application for the mortgage, loan, debt,  
3 or obligation.

4 g. With respect to any loan, debt, or obligation between a  
5 person and one or more unsecured creditors or debt collectors, any  
6 product, service, plan, or program represented, expressly or by  
7 implication:

8 a. to repay one or more unsecured loans, debts, or  
9 obligations; or

10 b. to combine unsecured loans, debts, or obligations into  
11 one or more new loans, debts, or obligations.

12 G. "Telemarketing" means any plan, program, or campaign which is  
13 conducted to induce the purchase of goods or services or a charitable  
14 contribution, by use of one or more telephones, and which involves more than  
15 one interstate telephone call.

### 16 III. ORDER

17 In view of the foregoing, it is hereby ORDERED as follows:

18 1. The Settling Defendants are permanently RESTRAINED and  
19 ENJOINED from advertising, marketing, promoting, offering for sale, selling,  
20 or Assisting Others in the advertising, marketing, promoting, offering for sale, or  
21 selling, of any Secured or Unsecured Debt Relief Product or Service.

22 2. The Settling Defendants are permanently  
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offering for sale, or selling of any product, service, plan, or program are permanently RESTRAINED and ENJOINED from making any representation or Assisting Others in making any misrepresentation, expressly or by implication, about the benefits, performance, or efficacy of any product or service, unless the representation is non-misleading, and, at the time such representation is made, that the Settling Defendant posNEce( p)-2.4 Srepresentationoht (





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Receiver and shall execute any instrument or document presented by the Receiver, and do whatever else the Receiver deems necessary or desirable to effect such transfer.

Upon such transfer, the real property shall be an asset of the receivership estate, to be governed by Paragraph 10 of this Order.

iii. Defendant Bhakta shall, within twenty (20) days after the date of entry of this Order, either:

(1) transfer to the FTC or its designated agent cash in the amount of \$5,682 or

(2) transfer to the Receiver title to the 2021 Toyota



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(9) Bank of America shall, within ten (10) days of receipt of a copy of this Order, transfer to the FTC or its designated agent all holdings in account number xxxx6655 in the name of Kishan Bhakta;

(10) Navy Federal Credit Union (“Navy Federal”) shall, within ten (10) days of receipt of a copy of this Order, transfer to the FTC or its designated agent all holdings in account number xxxx3187 in the name of Kishan Bhakta;

(11) Navy Federal shall, within ten (10) days of receipt of a copy of this Order, transfer to the FTC or its designated agent all holdings in account number xxxx4111 in the name of Brandon Clores;

(12) Navy Federal shall, within ten (10) days of receipt of a copy of this Order, transfer to the FTC or its designated agent all holdings in account number xxxx1642 in the name of Brandon Clores;

(13) TD AmeriTrade shall, within ten (10) days of receipt of a copy of this Order, liquidate and transfer to the FTC or its designated agent all holdings in account number xxx6822 in the name of Brandon Clores;

(14) TD AmeriTrade shall, within ten (10) days of receipt of a copy of this Order, liquidate and transfer to the FTC or its designated agent all holdings in account number xxxx9011 in the name of Kishan Bhakta;

(15) TD AmeriTrade shall, within ten (10) days of receipt of a copy of this Order, liquidate and transfer to the FTC or its designated agent all holdings in account number xxxx1620 in the name of Kishan Bhakta;

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(16) Webull Financial LLC (“Webull”) shall, within ten (10) days of receipt of a copy of this Order, liquidate and transfer to the FTC or its designated agent all holdings in account number xxxx5717 in the name of Kishan Bhakta; and

(17) Webull shall, within ten (10) days of receipt of a copy of this Order, liquidate and transfer to the FTC or its designated agent all holdings in account number xxxx1247 in the name of Brandon Clores.

d. Upon such payment and all other asset transfers, as set forth in Paragraph 6(c) above and Paragraph 7 below, the remainder of the judgment is suspended, subject to the Paragraphs below.

e. The asset freeze is modified to permit the transfers and liquidations identified in this Paragraph. Upon completion of those



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(1) a supplemental financial disclosure form for  
Brandon Clores bearing a date of May 9, 2023; and

(2) account statements associated with Navy  
Federal Credit Union accounts in the name of Brandon  
Clore;

ix. the additional documentation submitted by email from  
Settling Defendants' counsel Brent Phillips to FTC counsel  
Katherine Aizpuru dated July 25, 2023, and enclosing a statement  
from Navy Federal Credit Union associated with an account in the  
name of Brandon Clores; and

x.





1           Settling Defendants have no right to challenge any actions the FTC or its  
2           representatives may take pursuant to this Subparagraph.

3           8.       The Settling Defendants, Settling Defendants' officers, agents,  
4           employees, attorneys, and all other Persons in active concert or participation  
5           with any of them, who receive actual notice of this Order, are permanently  
6           RESTRAINED and ENJOINED from directly or indirectly:

7                   a.       Failing to provide sufficient customer information to enable  
8                   the FTC to efficiently administer consumer redress. The Settling  
9                   Defendants represent that they have provided this redress information to  
10                  the FTC. If a representative of the FTC requests in writing any  
11                  information related to redress, the Settling Defendants must provide it, in  
12                  the form prescribed by the FTC, within fourteen (14) days.

13                  b.       Disclosing, using, or benefitting from customer information,  
14                  including the name, address, telephone number, email address, social  
15                  security number, FSA ID, other identifying information, or any data that  
16                  enables access to a customer's account (including a student loan account,  
17                  credit card, bank account, or other financial account) that any Settling  
18                  Defendant obtained prior to entry of this Order in connection with the  
19                  marketing or sale of Secured or Unsecured Debt Relief Products or  
20                  Services; and

21                  c.       Failing to destroy such customer information in all forms in  
22                  their possession, custody, or control within thirty (30) days after receipt  
23                  of written direction to do so from a representative of the FTC.

24           Provided, however, that customer information need not be disposed of, and may  
25           be disclosed, to the extent requested by a government agency or required by law,  
26           regulation, or court order.

27           9.       The Settling Defendants must fully cooperate with representatives  
28           of the FTC in this case and in any investigation related to or associated with the

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1 i. all principals, officers, directors, and LLC managers  
2 and members;

3 ii. all employees having managerial responsibilities for  
4 Secured or Unsecured Debt Relief Products or Services, and all  
5 agents and representatives who participate in the Secured or  
6 Unsecured Debt Relief Products or Services; and

7 iii. any business entity resulting from any change in  
8 structure as set forth in Paragraph 12. Delivery must occur within  
9 seven (7) days of entry of this Order for current personnel. For all  
10 others, delivery must occur before they assume their  
11 responsibilities.

12 c. From each individual or entity to which a Settling Defendant  
13 delivered a copy of this Order, that Settling Defendant must obtain,  
14 within thirty (30) days, a signed and dated acknowledgment of receipt of  
15 this Order.

16 12. The Settling Defendants shall make timely submissions to the  
17 FTC, as follows:

18 a. One year after entry of this Order, each Settling Defendant  
19 must submit a compliance report, sworn under penalty of perjury:

20 i. Each Settling Defendant must:

21 (1) identify the primary physical, postal, and email  
22 address and telephone number, as designated points of  
23 contact, which representatives of the FTC may use to  
24 communicate with the Settling Defendant;

25 (2) identify all of that Settling Defendant's  
26 businesses by all of their names, telephone numbers, and  
27 physical, postal, email, and Internet addresses;

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- 1 (1) any designated point of contact; or
- 2 (2) the structure of any Settling Corporate Defendant or
- 3 any entity that any Settling Defendant has any ownership interest in
- 4 or controls directly or indirectly that may affect compliance
- 5 obligations arising under this Order, including: creation, merger,
- 6 sale, or dissolution of the entity or any subsidiary, parent, or
- 7 affiliate that engages in any acts or practices subject to this Order.

8 ii. Additionally, each Settling Individual Defendant must  
9 report any change in:

- 10 (1) name, including aliases or fictitious name, or
- 11 residence address; or
- 12 (2) title or role in any business activity, including
- 13 any business for which such Settling Defendant performs
- 14 services whether as an employee or otherwise and any entity
- 15 in which such Settling Defendant has any ownership interest,
- 16 and identify the name, physical address, and any Internet
- 17 address of the business or entity.

18 c. Each Settling Defendant must submit to the FTC notice of  
19 the filing of any bankruptcy petition, insolvency proceeding, or similar  
20 proceeding by or against such Settling Defendant within 14 days of its  
21 filing.

22 d. Any submission to the FTC required by this Order to be  
23 sworn under penalty of perjury must be true and accurate and comply  
24 with 28 U.S.C. § 1746, such as by concluding: " I declare under penalty of  
25 perjury under the laws of the United States of America that the foregoing  
26 is true and correct. Executed on: \_\_\_\_\_" and supplying the date,  
27 signatory's full name, title (if applicable), and signature.

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1 e. Unless otherwise directed by a FTC representative in  
2 writing, all submissions to the FTC pursuant to this Order must be  
3 emailed to DEbrief@ftc.gov or sent by overnight courier (not the  
4 U.S. Postal Service) to: Associate Director for Enforcement, Bureau of  
5 Consumer Protection, Federal Trade Commission, 600 Pennsylvania  
6 Avenue NW, Washington, DC 20580. The subject line must begin:  
7 FTC v. BCO Consulting Services, Inc., et al., X230027.

8 13. The Settling Defendants must create certain records for twenty  
9 (20) years after entry of the Order, and retain each such record for five (5) years.  
10 Specifically, each Settling Defendant for any business that such Settling  
11 Defendant, individually or collectively with any other Settling Defendants, is a  
12 majority owner or controls directly or indirectly, must create and retain the  
13 following records:

14 a. accounting records showing the revenues from all goods or  
15 services sold;

16 b. personnel records showing, for each Person providing  
17 services, whether as an employee or otherwise, that Person's: name;  
18 addresses; telephone numbers; job title or position; dates of service; and  
19 (if applicable) the reason for termination;

20 c. records of all consumer complaints and refund requests,  
21 whether received directly or indirectly, such as through a third party, and  
22 any response;

23 d. all records necessary to demonstrate full compliance with  
24 each provision of this Order, including all submissions to the FTC; and

25 e. a copy of each unique advertisement or other marketing  
26 material.

27 14. For the purpose of monitoring the Settling Defendants' compliance  
28 with this Order, including the financial representations upon which part of the

1 judgment was suspended and any failure to transfer any assets as required by this  
2 Order:

3 a. Within fourteen (14) days of receipt of a written request from  
4 a representative of the FTC, each Settling Defendant must: submit  
5 additional compliance reports or other requested information, which must  
6 be sworn under penalty of perjury; appear for depositions; and produce  
7 documents for inspection and copying. The FTC is also authorized to  
8 obtain discovery, without further leave of court, using any of the  
9 procedures prescribed by Rules 29, 30 (including telephonic depositions),  
10 31, 33, 34, 36, 45, and 69 of the Federal Rules of Civil Procedure.

11 b. For matters concerning this Order, the FTC is authorized to  
12 communicate directly with each Settling Defendant. The Settling  
13 Defendants must permit representatives of the FTC to interview any  
14 employee or other Person affiliated with any Settling Defendant who has  
15 agreed to such an interview. The Person interviewed may have counsel  
16 present.

17 c. The FTC may use all other lawful means, including posing,  
18 through its representatives as consumers, suppliers, or other individuals  
19 or entities, to Settling Defendants or any individual or entity affiliated  
20 with the Settling Defendants, without the necessity of identification or  
21 prior notice. Nothing in this Order limits the FTC's lawful use of  
22 compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15  
23 U.S.C. §§ 49, 57b-1.

24 d. Upon written request from a representative of the FTC, any  
25 consumer reporting agency must furnish consumer reports concerning  
26 Settling Individual Defendants, pursuant to Section 604(1) of the Fair  
27 Credit Reporting Act, 15 U.S.C. § 1681b(a)(1).  
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15. This Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

IT IS SO ORDERED.

Dated: /\*fh6dfg \_\_\_\_\_

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JUDGE