

Federal Trade Commission, and
State of Ohio ex rel. Attorney General
Dave Yost,

Plaintiffs,

v.

Educare Centre Services, Inc., et al.,

Defendants.

No. 3:19-CV-196

JOINT STIPULATION TO ENTRY OF STIPULATED ORDERS FOR PERMANENT INJUNCTIONS AND MONETARY JUDGMENT AS TO DEFENDANTS MOHAMMAD SOUHEIL, 9896988 CANADA, INC., PROLINK VISION, S.R.L., GLOBEX TELECOM, INC., 9506276 CANADA, INC; WISSAM JALIL AND TRIPLETEL, INC.; SAM MADI AND EDUCARE CENTRE SERVICES, INC.; AND CHARLES KHAROUF

Plaintiffs Federal Trade Commission and State of Ohio, and all Defendants in this matter, respectfully submit this Joint Application for Entry of Stipulated Orders for Permanent Injunction and Monetary Judgment, which, if approved by the Court, will resolve all remaining issues in this action.¹ Accordingly, Plaintiffs and Defendants respectfully request that the Court enter the Proposed Stipulated Orders.

Respectfully submitted,

ALDEN F. ABBOTT
General Counsel

Dated: September 21, 2020

/s/ J. Ronald Brooke, Jr.

Christopher E. Brown
J. Ronald Brooke, Jr.
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-8528
Washington, DC 20580
(202) 326-2825 / cbrown3@ftc.gov
(202) 326-3484 / jbrooke@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

DAVE YOST
Ohio Attorney General

/s/ Erin Leahy

Erin Leahy (Ohio Bar #69509)
Assistant Attorneys General
Consumer Protection Section
30 E. Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 466-8831
erin.leahy@OhioAttorneyGeneral.gov
Attorneys for Plaintiff
STATE OF OHIO

¹ A representative of the shareholders of Globex Telecom, Inc., and 9506276 Canada, Inc. and their subsidiaries ("Globex Shareholders") has executed one of the Proposed Stipulated Orders on behalf of the Globex Shareholders.



Mitchell N. Roth, Esq.

ROTH JACKSON

Attorney for Defendants Mohammad Souheil, Prolink Vision, S.R.L., and 9896988 Canada, Inc.,

/s/Haroon Rafati

Haroon Rafati, Esq.

The Rafati Law Firm, PLLC

Attorney for Defendants Wissam Jalil and Tripletel, Inc.

/s/ Michael Gerard Fletcher

Michael Gerard Fletcher

FRANDZEL ROBINS BLOOM & CSATO, L.C.

Attorney for Robb Evans & Associates LLC, Court Appointed Receiver for Defendants Globex Telecom, Inc., 9506276 Canada, Inc., and Educare Centre Services, Inc.

/s/ Sam Madi

Sam Madi, *Pro se*

/s/ Charles Kharouf

Charles Kharouf, *Pro se*

CERTIFICATE OF SERVICE

I, J. Ronald Brooke, Jr., hereby certify that on September 21, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing the foregoing document to be served on the following via email:

Via E-mail:

Genevieve C. Bradley
gbradley@rothjackson.com

Mitchell Roth

mroth@rothjackson.com

Roth Jackson Gibbons Conklin, PLC

Daniel H. Hernandez

dhernandez@raylaw.com

Aldo Lopez

alopez@raylaw.com

RAY, PEÑA, McCHRISTIAN, P.C.

Attorneys for Defendants Prolink Vision, S.R.L., Mohammad Souheil a/k/a Mohammed Souheil and Mike Souheil, and 9896988 Canada Inc.

Ken Slavin

Kemp Smith LLP

Ken.Slavin@kempsmith.com

Attorney for the Receiver

Haroon Rafati

The Rafati Law Firm, PLLC

7106 Glen Rosa Dr.

Katy, Texas 77494

haroon@rafatilaw.com

Attorney for Wissam Abedel Jalil and Tripletel, Inc.

Deborah L. Fischer

Law Offices of Stephen H. Nickey

El Paso, Texas 79902

Tele: (915) 351-6900

dfischer@nickeylaw.com

Rob Seiden

Amiad Kushner

SEIDEN LAW GROUP LLP

469 7th Avenue, Suite 502

New York, NY 10018

Tele: (212) 523-0686

Amiad Kushner

akushner@seidenlegal.com

Attorneys for F.I.T. Ventures Lending Inc.

Jon Alexander Bluebond
Vinson & Elkins LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
abluebond@velaw.com

Hugo Babos-Marchand
Borden Ladner Gervais LLP
1000, rue De La Gauchetière Ouest, bureau
Suite 900, Montréal, QC, Canada H3B 5H4
hbabosmarchand@blg.com
Attorneys for Non Party MNP LTD

Via E-mail:

Sam Madi
508 Foquet
Laval, Quebec H7X 3J5, Canada
sammadi1980@gmail.com

Pro Se

Charles Kharouf
201-427 Etienne-Lavoie
Laval, Quebec H7XOB9, Canada
ckharouf@gmail.com

Pro Se (Defaulted)

/s/ J. Ronald Brooke, Jr.