

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.

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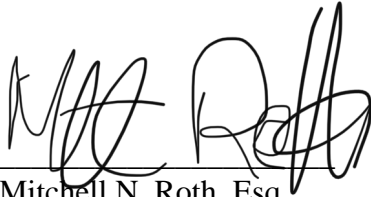
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¹ A representative of the shareholders of Globex Telecom, Inc., and 9506276 Canada, Inc. and their subsidiaries ("Globex Shareholders") has executed one of the Proposed Stipulated Orders on behalf of the Globex Shareholders.



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/s/ Michael Gerard Fletcher

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/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:

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