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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

FEDERAL TRADE COMMISSION,
Plaintiff,
vs.
APARTMENT HUNTERS, INC. *et al.*,
Defendants.

No. 8:18-CV-1636-AG (DFMx)

~~[PROPOSED]~~ ORDER HOLDING
DEFENDANTS IN CONTEMPT

The Court having considered Plaintiff's *Ex Parte* Application for Order to Show Cause Why Defendants Should Not Be Held in Contempt, along with the accompanying memorandum of points and authorities and exhibit filed in this matter, as well as any response by Defendants, and the proceedings conducted on OCT. 10, 2018 pursuant to the Court's Order to Show Cause, and good cause appearing, the Court orders the following:

IT IS ORDERED that Defendants Apartment Hunters, Inc., Real Estate Data Solutions, Inc., Rental Home Listings Inc., UAB Apartment Hunters, Inc., Steven Shayan, and Kevin Shayan ("Defendants") are held in **CIVIL CONTEMPT OF COURT** for their violations of the Court's Temporary Restraining Order ("TRO"). (Doc. No. 14).

1 **IT IS FURTHER ORDERED** that Defendants comply with the terms of
2 the TRO by 5:00 pm Pacific Time on the day following the entry of the Court's
3 order finding Defendants in contempt.

4 **IT IS FURTHER ORDERED** that if Defendants do not purge his
5 contempt by 5:00 pm Pacific Time on the day following the entry of this order, the
6 Court imposes a coercive civil contempt fine of \$1,000 per day of continued
7 noncompliance, payable to the United States through the Clerk of the Court for the
8 District of Central California.

9 **IT IS FURTHER ORDERED** that Defendants may purge their contempt
10 by showing, by affidavit filed with the Court by 5:00 pm Pacific Time on the first
11 day after the Court enters its order, that Defendants, their agents, employees, and
12 any other persons in active concert or participation with them, have:

- 13 1) Ceased advertising, marketing, promoting, offering for sale, or
14 selling access to rental listings for properties that have been
15 approved for, accept, or purportedly accept any type of
16 government rent subsidy; and
- 17 2) Ceased, in connection with the advertising, marketing,
18 promoting, offering for sale or selling of subscriptions or access
19 to rental listings, using in any domain names, URLs for public-
20 facing websites, keywords purchased to advertise Defendants'
21 services on search engines mobile applications, or business
22 names or aliases, any of the following terms: Section 8,
23 Voucher, Subsidized, Affordable housing, Low-income, Public
24 housing, Income-based, or Project-based.

~~25 **IT IS FURTHER ORDERED** that any entity hosting any webpage or
26 website for any Defendant and any domain registrar, including, but not limited to
27 eNom, Inc., who has provided or is providing domain name registration services on
28 any Defendant's website must;~~

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~~A. Immediately take whatever steps necessary to ensure that any webpage or website operated, in whole or in part, in connection with Defendants' advertising, marketing, promoting, offering for sale, or selling access to rental listings that have been approved for, accept, or purportedly accept any type of government rent subsidy, including, but not limited to, WeTakeSection8.com and LowIncomeHousing.rentals, cannot be accessed by the public; and~~

~~B. Prevent the destruction or erasure of any webpage or website operated, in whole or in part, on any Defendant's behalf, preserving such documents in the format in which they are currently maintained, and prevent the destruction or erasure of all records relating to Defendants.~~

SO ORDERED, this 10TH day of OCTOBER, 2018, at 4:00 P.m.



ANDREW J. GUILFORD
UNITED STATES DISTRICT JUDGE