

1 DANIEL G. BOGDEN  
United States Attorney  
2 District of Nevada  
BLAINE T. WELSH  
3 Assistant United States Attorney  
Nevada Bar. No. 4790  
4 333 Las Vegas Blvd. South, Suite 5000  
Las Vegas, Nevada 89101  
5 Telephone: (702) 388-6336  
Facsimile: (702) 388-6787  
6 Email: Blaine.Welsh@usdoj.gov

7 DAVID SHONKA  
Acting General Counsel  
8 NIKHIL SINGHVI  
JASON D. SCHALL  
9 HELEN P. WONG  
IOANA RUSU  
10 LaSHAWN M. JOHNSON  
Federal Trade Commission  
11 600 Pennsylvania Ave, NW  
Mailstop NJ-3158  
12 Washington, D.C. 20580  
Telephone: (202) 326-3480 (Singhvi)  
13 Facsimile: (202) 326-3629  
Email: nsinghvi@ftc.gov; jschall@ftc.gov; hwong@ftc.gov;  
14 irusu@ftc.gov; ljohnson@ftc.gov

15  
16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 FEDERAL TRADE COMMISSION,  
19  
20 Plaintiff,  
21 v.  
22 AMG Services, Inc., et al.,  
23 Defendants, and  
24 Park 269 LLC, et al.,  
25 Relief Defendants.

Case No.: 2:12-cv-536-GMN-VCF

**AGREED JOINT MOTION TO ENTER  
STIPULATED ORDER FOR  
PERMANENT INJUNCTION AND  
JUDGMENT**

1 Plaintiff Federal Trade Commission (“FTC”) and Defendants AMG Services, Inc., SFS,  
2 Inc., Red Cedar Services, Inc., MNE Services, Inc., Scott A. Tucker, Blaine A. Tucker, AMG  
3 Capital Management, LLC, Level 5 Motorsports, LLC, LeadFlash Consulting, LLC, Black  
4 Creek Capital Corporation, Broadmoor Capital Partners, LLC, Don E. Brady, Robert D.  
5 Campbell, and Troy L. LittleAxe, Jr. (collectively, “Defendants”) respectfully request that the  
6 Court enter the attached Stipulated Order for Permanent Injunction and Judgment for the  
7 following reasons:

- 8 1. The parties have reached agreement on a stipulated permanent injunction to resolve  
9 Counts II and IV in the FTC’s amended complaint as to the above-listed Defendants.
- 10 2. The proposed order promotes the orderly resolution of the controversy and judicial  
11 economy.  
12

13 The parties therefore respectfully request that the Court enter the attached Stipulated  
14 Order for Permanent Injunction and Judgment.

15 Dated: July 18, 2013

16  
17 /s/ Nikhil Singhvi  
18 NIKHIL SINGHVI  
19 Federal Trade Commission  
20 600 Pennsylvania Ave., NW  
21 Mailstop NJ-3158  
Washington, DC 20580  
Telephone: (202) 326-3480  
Facsimile: (202) 326-3629  
Email: nsinghvi@ftc.gov

22 *Attorney for Plaintiff Federal Trade*  
23 *Commission*

17 /s/ Conly Schulte  
18 CONLY SCHULTE  
19 FREDERICKS PEEBLES & MORGAN LLP  
20 1900 Plaza Drive  
Louisville, CO 80027  
Omaha, NE 68116  
Telephone: (303) 673-9600  
Facsimile: (303) 673-9155  
Email: cschulte@ndnlaw.com

22 *Attorney for Defendants AMG Services, Inc.;*  
23 *Red Cedar Services, Inc. dba 500FastCash;*  
24 *SFS, Inc. dba OneClickCash; MNE Services,*  
25 *Inc., dba Tribal Financial Services, Ameriloan,*  
26 *UnitedCashLoans, USFastCash*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

/s/ Bradley Weidenhammer  
BRADLEY WEIDENHAMMER  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago IL 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email:  
bradley.weidenhammer@kirkland.com

*Attorney for Defendants AMG Services, Inc. and MNE Services, Inc. (dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash)*

/s/ Nathan F. Garrett  
NATHAN F. GARRETT  
GRAVES BARTLE MARCUS & GARRETT, LLC  
1100 Main Street  
Suite 2700  
Kansas City, MO 64105  
Telephone: (816) 256-3181  
Facsimile:  
Email: ngarrett@gmbglaw.com

*Attorney for Defendant Don E. Brady*

/s/ Paul C. Ray  
PAUL C. RAY  
PAUL C. RAY, CHTD.  
8670 West Cheyenne Avenue  
Suite 120  
Las Vegas, NV 89129  
Telephone: (702) 823-2292  
Facsimile: (702) 823-2384  
Email: paulcraylaw@gmail.com

*Attorney for Defendant Troy L. LittleAxe, Jr.*

/s/ David J. Merrill  
DAVID J. MERRILL  
DAVID J. MERRILL, P.C.  
Nevada Bar No. 6060  
10161 Park Run Drive, Suite 150  
Las Vegas, NV 89145  
Telephone: (702) 566-1935  
Facsimile: (702) 924-0787  
Email: david@djmerrillpc.com

*Attorney for Defendants AMG Services, Inc. and MNE Services, Inc. (dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash)*

/s/ Nick J. Kurt  
NICK J. KURT  
BERKOWITZ OLIVER WILLIAMS SHAW & EISENBRANDT LLP  
2600 Grand Boulevard, Suite 1200  
Kansas City, MO 64108  
Telephone: (816) 561-7007  
Facsimile: (816) 561-1888  
Email: nkurt@berkowitzoliver.com

*Attorney for Defendants Scott A. Tucker, Blaine A. Tucker, AMG Capital Management, LLC, Level 5 Motorsports, LLC, LeadFlash Consulting, LLC, Black Creek Capital Corporation, and Broadmoor Capital Partners, LLC*

/s/ Jay Young  
JAY YOUNG  
MARQUIS AURBACH COFFING  
10001 Park Run Drive  
Las Vegas, NV 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 856-8900  
Email: j@marquisaurbach.com

*Attorney for Defendant Robert D. Campbell*

**CERTIFICATE OF SERVICE**

I, Nikhil Singhvi, certify that, as indicated below, all parties were served with **AGREED JOINT MOTION TO ENTER STIPULATED ORDER FOR PERMANENT INJUNCTION AND JUDGMENT** filed with the Court.

Dated this 18th day of July, 2013

/s/ Nikhil Singhvi

Nikhil Singhvi

**Electronic Case Filing:**

Joshua M. Dickey ([jdickey@baileykennedy.com](mailto:jdickey@baileykennedy.com))

*Attorney for Red Cedar Services, Inc. dba 500FastCash; SFS, Inc. dba OneClickCash*

Conly J. Schulte ([cschulte@ndnlaw.com](mailto:cschulte@ndnlaw.com))

Francis J. Nyhan ([jnyhan@ndnlaw.com](mailto:jnyhan@ndnlaw.com))

Nicole Ducheneaux ([nducheneaux@ndnlaw.com](mailto:nducheneaux@ndnlaw.com))

*Attorneys for Defendants AMG Services, Inc.; Red Cedar Services, Inc. dba 500FastCash; SFS, Inc. dba OneClickCash; MNE Services, Inc. dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash*

David J. Merrill ([david@djmerrillpc.com](mailto:david@djmerrillpc.com))

Debra K. Lefler ([debra.lefler@kirkland.com](mailto:debra.lefler@kirkland.com))

Bradley Weidenhammer ([bweidenhammer@kirkland.com](mailto:bweidenhammer@kirkland.com))

Charles Kalil ([ckalil@kirkland.com](mailto:ckalil@kirkland.com))

Richard Howell ([rhowell@kirkland.com](mailto:rhowell@kirkland.com))

Matthew S. Meltzer ([mmeltzer@kirkland.com](mailto:mmeltzer@kirkland.com))

Peter J. Wozniak ([pwozniak@kirkland.com](mailto:pwozniak@kirkland.com))

*Attorneys for Defendants AMG Services, Inc. and MNE Services, Inc. dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash*

Von S. Heinz ([vheinz@lrlaw.com](mailto:vheinz@lrlaw.com))

Darren J. Lemieux ([dlemieux@lrlaw.com](mailto:dlemieux@lrlaw.com))

E. Leif Reid ([lreid@lrlaw.com](mailto:lreid@lrlaw.com))

Jeffrey D. Morris ([jmorris@berkowitzoliver.com](mailto:jmorris@berkowitzoliver.com))

Ryan C. Hudson ([rhudson@berkowitzoliver.com](mailto:rhudson@berkowitzoliver.com))

Nick J. Kurt ([nkurt@berkowitzoliver.com](mailto:nkurt@berkowitzoliver.com))

*Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC; LeadFlash Consulting, LLC; Black Creek Capital Corporation; Broadmoor Capital Partners, LLC; Scott A. Tucker; Blaine A. Tucker*

L. Christopher Rose ([lcr@juww.com](mailto:lcr@juww.com))

Michael R. Ernst ([mre@juww.com](mailto:mre@juww.com))

*Attorneys for Defendants The Muir Law Firm, LLC and Timothy J. Muir*

Jay Young ([jay@maclaw.com](mailto:jay@maclaw.com))

*Attorney for Defendant for Robert D. Campbell*

Paul C. Ray ([paulcraylaw@aol.com](mailto:paulcraylaw@aol.com))

Alyssa D. Campbell ([acampbell@laic-law.com](mailto:acampbell@laic-law.com))

*Attorneys for Defendant Troy L. Littleaxe*

Patrick J. Reilly ([preilly@hollandhart.com](mailto:preilly@hollandhart.com))

Linda C. McFee ([lmcfee@mcdowellrice.com](mailto:lmcfee@mcdowellrice.com))

*Attorneys for Relief Defendants Kim C. Tucker and Park 269 LLC*

1 Brian R. Reeve ([breeve@swlaw.com](mailto:breeve@swlaw.com))  
Nathan F. Garrett ([ngarrett@gbmglaw.com](mailto:ngarrett@gbmglaw.com))  
2 Whitney P. Strack ([pstrack@gbmglaw.com](mailto:pstrack@gbmglaw.com))  
3 *Attorneys for Defendant Don E. Brady*

4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28