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UNITED STATES DISTRICT COURT OF CALIFORNIA
CENTRAL DISTRICT – WESTERN DIVISION

THE REVOLUTION FMO, LLC, a.k.a.
THE REVOLUTION MO, LLC,

Plaintiffs,

v.

RONALD GRANT, an individual,
GOLD COAST BROADCASTING,
LLC, a limited liability company, and
DOES 1 through 10, inclusive,

Defendants.

Case No. 2:15-cv-02719
[Hon. Manuel L. Real, Ctrm. 8]

**ORDER GRANTING PERMANENT
INJUNCTION**

1 Plaintiff The Revolution FMO, LLC a.k.a. The Revolution MO, LLC
2 (hereinafter “Revolution”) filed a Complaint For: (1) Copyright Infringement, (2)
3 Misappropriation of Confidential Information/Trade Secrets, (3) Violation of
4 Business and Professions Code section 17200, (4) Breach of Contract, (5) Express
5 Indemnity, and (6) Conversion against Defendant Ronald Grant (“Grant”) to obtain
6 temporary, preliminary, and permanent injunctive relief, compensatory and punitive
7 damages, and other relief for Grant’s alleged unauthorized retention, use, discussion
8 and dissemination of copyright, trade secret, proprietary and confidential materials
9 and information developed by and belonging to Revolution.

10 Revolution and Grant have agreed to the entry of this Order for Permanent
11 Injunction by this Court to resolve this Action.

12 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED as follows:

13 I. FINDINGS

- 14 a. This Court has jurisdiction over this matter.
- 15 b. Grant and Revolution waive all rights to appeal or otherwise
16 challenge or contest the validity of this Order. Grant further waives
17 and releases any claim he may have against Revolution or its
18 employees, attorneys and representatives arising out of this Action
19 and under the terms of this Order.
- 20 c. The Court incorporates by reference, and relies as if fully set forth
21 herein, on the findings of facts set forth in the Court’s Temporary
22 Restraining Order (Docket Entry # 14) and the Preliminary
23 Injunction (Docket Entry #35).

24 II. DEFINITIONS

25 For the purpose of this Order, the following definitions shall apply:

- 26 a. “Revolution Materials” means copyrighted, trade secret,
27 proprietary and confidential materials and information developed
28 by and

1 belonging to Revolution, including but not limited to presentation
2 outlines and scripts, client workbooks, templates for sales and
3 investment seminars, questionnaires and related materials.

4 b. The parties stipulate that the proprietary documents included under
5 the definition of Revolution Materials, for the sole purpose of this
6 Order, consists only of the following list of items which are
7 identified by document description and document number:

8 1) Life Insurance Transfer History Template (no 1035
9 exchange), R150110157OOS

10 2) Life Insurance Transfer History Template,
11 R150110156OOS

12 3) Account Policy Information, R15011007

13 4) Insurance Only Licensed EIA Form, R15011050

14 5) Bullet Points, R15011083

15 6) Gold Boarder Template, R15011096, R15011097,
16 R15011098

17 7) Transfer History – Anniversary, R15011029R

18 8) Client Review Disclosure Form, R15011032

19 9) Valued Client Response Sheet, R150110107

20 10) Client Disclosure Letter, R15011039

21 11) FINRA Understanding Different Retirement Plans
22 Handout, R15011003R

23 12) FINRA Understanding Different Types of Annuities
24 Handout, R15011004R

25 13) Client Appreciation Movie Event, R15011031R

26 14) Office Training Manual, R15011034R

27 15) Appointment Setting Manual, R15011060R
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- 1 16) Basic Training Manual, R15011065R
- 2 17) Response Sheet, R15011038
- 3 18) Valued Client Response Sheet, R15011037
- 4 19) Response Sheet Stray 401k, R15011011
- 5 20) FAQs, R15011025
- 6 21) Welcome Back Letter, R15011040
- 7 22) Mini Basic Training Manual, R150110105R
- 8 23) Advanced Training Manual, R150110140R
- 9 24) Special Ops Manual, R150110141R
- 10 25) Bring a Friend Invite, R15011018
- 11 26) Client Appreciation Event, R15011028
- 12 27) Client Appreciation Event Mailer, R15011009OOS,
- 13 R15011007OOS
- 14 28) Valued Client Response Sheet, R15011037
- 15 29) Movie Flyer, R15011045
- 16 30) Ela Event Flyer, R15011042
- 17 31) Tips to Building a Rotation, R15011002
- 18 32) Client Review Postcard, R15011076
- 19 33) Client Disclosure, R15011039
- 20 34) Step Sales System, R15011051
- 21 35) FINRA Retirement Plans Postcards, R150110155R
- 22 36) Sample of a Transfer Letter, R15011001TPO
- 23 37) Cover Sheet, R15011034
- 24 38) Policy Information Labels, R15011048
- 25 39) Statement Labels, R15011004OOS
- 26 40) To My Beneficiaries Letter, R15011030
- 27 41) Transfer History First Delivery, R15011063OOS
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- 1 42) Delivery Receipt Disclosure, R15011033
- 2 43) Understanding Different Types of Retirement Plans,
- 3 R15011001
- 4 44) Sample Transfer Letter, R15011001TPO
- 5 45) Understanding Different Retirement Plans Presenters
- 6 Script, R15011002R
- 7 46) Tips for Building a Rotation, R15011002
- 8 47) Statements Labels, R15011004OOS
- 9 48) Existing Client Letter, R150110101
- 10 49) Valued Client Response Sheet 2015, R150110107
- 11 50) Response Sheet Stray 401k, R15011011
- 12 51) Redline, R150110164R(a)bc
- 13 52) Red and Blue Lines, R150110164Ra(b)c
- 14 53) All Lines, R150110164Rab(c)
- 15 54) Client Annual Review Reminder Letters, R15011020
- 16 55) FAQs, R15011025
- 17 56) Client Appreciation Event Invite Generic, R15011028
- 18 57) Transfer History Anniversary-ccs-rr, R15011029R
- 19 58) To My Beneficiaries, R15011030
- 20 59) Client Review Form, R15011032
- 21 60) Client Delivery Receipt, R15011033
- 22 61) Client Cover Sheet, R15011034
- 23 62) Valued Client Response Sheet, R15011037
- 24 63) Response Sheet Basic, R15011038
- 25 64) Money Chasing Manual, R15011041R
- 26 65) Pumpkin Pie Mailer, R15011043
- 27 66) Movie Night Movie Flyer, R15011045
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- 67) Policy Folder Labels, R15011048
- 68) Five Steps Sales System, R15011051
- 69) Presenters Outline Understanding Different Retirement Strategies, R15011058
- 70) Workbook Seminar Understanding Different Retirement Strategies, R15011058R
- 71) Appointment Setting Manual 2015, R15011060R
- 72) Transfer History First Delivery, R15011063OOS

ORDER

III. PERMANENT INJUNCTION

IT IS ORDERED THAT Grant and his agents, servants, employees, attorneys, and all those in concert or participation with him, are permanently restrained and enjoined from:

- a. Using, disseminating or otherwise discussing the Revolution Materials in any forum or by any medium, including but not limited to any website, any social media, any seminars, any client and prospective client encounters, meetings or situations and through any broadcasts (radio, online or otherwise) now and in the future.
- b. Soliciting any employee or agent of the Revolution to leave the Revolution now and in the future.

IV. RETURN OF REVOLUTION MATERIALS

IT IS FURTHER ORDERED THAT Grant and his agents, servants, employees, attorneys, and all those in concert or participation with him, will immediately return any Revolution Materials in any form whatsoever to Revolution, and delete any Revolution Materials from all retrieval systems and databases or destroy same, including deletion of

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any online posting of videos of Grant's seminars containing any Revolution Materials.

V. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED THAT this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

IT IS SO ORDERED.

DATED: March 1, 2016



Honorable Manuel Real
U.S. District Judge