

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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4 FEDERAL TRADE COMMISSION,)

5 Plaintiff,)

6 vs.)

7 JEREMY JOHNSON, individually, as officer of)
8 Defendants I Works, Inc.; Cloud Nine, Inc.;)
9 CPA Upsell, Inc.; Elite Debit, Inc.; Internet)
10 Economy, Inc.; Market Funding Solutions, Inc.;)
11 and Success Marketing, Inc.; as a member of)
12 Defendant Network Agenda, LLC; and as the *de*)
13 *facto* principal of numerous Defendant Shell)
14 Companies; I WORKS, INC., a Utah)
15 Corporation, *et al.*,)

16 Defendants.)

Case No.: 2:10-cv-002203-RLH-GWF

ORDER

(Motion to Compel #423)

17 Before the Court is the Receiver's **Motion to Compel Turnover of Aircraft,**
18 **Related Documentation, and a Vehicle Pursuant to the Preliminary Injunction Order (#423,**
19 **filed Dec. 30, 2011).** The Court has also considered Defendant Jeremy Johnson's Opposition
20 (#441, filed Jan. 17, 2012), and the Receiver's Reply (#460, filed Jan. 27).

21 The Receiver asks the Court for an order compelling:

22 (1) Defendants Jeremy Johnson and Kevin Pilon, and non-party Sharla Johnson, a
23 member of Zibby Flight Service, LLC, to turnover to the Receiver possession, custody, and control
24 of that certain 2005 Robinson R44 II Helicopter, Tail No. N74367, registered to Zibby Flight
25 Service, LLC ("Robinson"), and directing them to provide detailed information to the Receiver
26 regarding the location and contact information for those presently in possession or custody of the
Robinson and directing them to provide instructions to those in possession, custody and control of
the Robinson to turn over possession, custody and control of the Robinson and all log books and

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1 related documentation concerning the Robinson to the Receiver or the Receiver's designated
2 representative forthwith;

3 (2) Johnson and non-parties Eric Husted and Sharla Johnson to turn over to the
4 Receiver forthwith all log books and all pages of log books, stickers and other documentation
5 necessary or appropriate to complete, update, and make current the log books for aircraft registered
6 to Zibby Flight Service, LLC, to the extent not previously turned over to the Receiver, as follows:
7 (a) 2009 Piper Malibu Mirage, Tail NO. N32ED; (b) 1978 Cessna P210N, Tail No. N4827P; and
8 (c) 2009 Piper Navajo, Tail No. N300WA;

9 (3) Defendants Johnson and Duane Fielding to turn over to the Receiver forthwith
10 all log books and all pages of log books, stickers, and other documentation necessary or
11 appropriate to complete, update, and make current the log books for that certain 2008 Robinson
12 R44 Raven II helicopter, Tail No. N41286 owned by Trigger, LLC; and,

13 (4) Johnson to turn over to the Receiver possession, custody, and control of that
14 certain 2005 Dodge Ram vehicle, VIN No. 3D7KS28C85G858208, the registered owner of which
15 is I Works, Inc.

16 In its preliminary injunction order, the Court ordered Johnson to repatriate assets
17 located outside the United States, and turn them over to the Receiver. (See Section IX). The
18 Court further ordered Johnson, as well as other persons with notice of the preliminary injunction,
19 to turn over receivership assets to the Receiver. (Section XVI). Finally, the Court ordered
20 Johnson and others with notice of the preliminary injunction to cooperate with the Receiver in its
21 administration of the receivership estate. (Section XVII). The Court orders Johnson, and others
22 previously referred to in this order, to comply with these provisions of the preliminary injunction
23 by turning over possession of the foregoing to the Receiver or its representative, as requested by
24 the Receiver.

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Accordingly, and for good cause appearing,

IT IS HEREBY ORDERED that the Receiver's Motion to Compel (#423) is GRANTED as follows: Johnson and those referenced in this order are ordered to turnover possession of the above-listed assets or items, or otherwise provide detailed information to the Receiver regarding the location and contact information for those presently in possession of those assets or items, to the Receiver within seven days from the date of this order.

Dated: February 13, 2012


ROGER L. HUNT
United States District Judge