

Nos. 19-508 & 19-825

IN THE
Supreme Court of the United States

AMG Capital Management, LLC, et al.,
Petitioners,

v.

FEDERAL TRADE COMMISSION,
Respondent.

CREDIT BUREAU CENTER, LLC, ET AL.,
Respondents,

v.

FEDERAL TRADE COMMISSION,
Petitioner.

**On Writ of Certiorari to
the United States Court of Appeals
for the Seventh and Ninth Circuits**

**BRIEF FOR AMICUS CURIAE OF
SBH A&I IN SUPPORT OF
PETITIONERS AMG CAPITAL
MANAGEMENT, LLC, ET AL., AND
CREDIT BUREAU CENTER, LLC, ET AL.**

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INTERESTS OF THE *AMICI CURIAE*¹

This brief is filed on behalf of 271 individuals associated together as SBH A&I, who are adversely impacted by the actions of the FTC (Federal Trade Commission) because of proceedings brought under § 13(b) of the FTCA (Federal Trade Commission Act).² The expansive meaning to the injunctive relief allowed by § 13(b) has adversely affected these *amici*.

SUMMARY OF ARGUMENT

The FTC uses the court-made expansion of the remedies available under § 13(b) of the FTCA to win cases because of the crushing effect of so-called equitable remedies lower courts employ at the urging of the FTC. These remedies include: receiverships that take over the business of a company; the liquidation of a company during the pendency of trial proceedings; the seizure of assets of the company, the principals of the company, and other non-party entities and companies. Meanwhile, the FTC publishes press releases that defame the parties to its enforcement proceeding. These

¹ Written consents from parties to the filing of *amicus curiae* briefs in support of any party are on file with the clerk. In accordance with Supreme Court Rule 37.6 SBH A&I avows that no counsel for any party in this case authored this brief in whole or in part. Additionally, no party nor any counsel for a party has made a monetary contribution intended to fund the preparation or submission of this brief.

² Those associated as SBH A&I are listed in Appendix A.

actions are not only unsupported by the language of § 13(b), they involve Constitutional violations that cannot, as a practical matter, be addressed by those whose rights are trampled.

ARGUMENT

A. Generally

The purpose of the FTC is consumer protection. *See* 15 U.S.C. § 45(a). The commission is supposed to ensure that unfair trade practices do not dupe consumers out of their money.

The FTC is jaundiced when it views multi-level marketing structures and is quick to characterize these as pyramid or Ponzi schemes. *See, generally*, FTC ON MLM: MULTI-LEVEL MARKETING BUSINESS AND PYRAMID SCHEMES, <https://www.consumer.ftc.gov/articles/0065-multi-level-marketing-businesses-and-pyramid-schemes>.

In 1975 the FTC established a two-prong test for determining if a multi-level marketing program is a pyramid scheme. *In the matter of Koscot Interplanetary, Inc.*, 86 FTC 106 (1975). The decision in *Koscot* characterized pyramid, and therefore, as illegal schemes as something like a chain letter where people are not really buying product but are simply getting money via a kickback from new recruits. Since multi-level marketing is dependent on recruits for success, the FTC is zealous in its review of such marketing programs to make

sure multi-level marketing does not proliferate in the United States. Multi-level marketing, however, is a large part of the economy. Published statistics show that the annual commerce involved in multi-level marketing is \$ 35 billion. DIRECT SELLING IN THE UNITED STATES, 2019 INDUSTRY OVERVIEW, https://www.dsa.org/docs/default-source/research/growth-outlook/2019-research-overview-fact-sheet-final.pdf?sfvrsn=3bfedda5_2%27.

A case typical of the FTC's actions against pyramid schemes is *FTC v. BurnLounge, Inc.*, 753 F.3d 878, 9th Cir. (2014), where a violation of the FTCA (Federal Trade Commission Act), was found because the recruiter gets kickbacks from the amount the recruit paid for worthless product so that he, too, could get kickbacks from those he recruited into the scheme.

But not all cases are like *BurnLounge*. An example is presently pending in the United States District Court for the District of Arizona, *FTC v. Success By Media*, No. CV-20-0047-PHX-DWL. Whether SBM (Success By Media d/b/a Success By Health) paid kickbacks is hotly contested, but the FTC has effectively shut down the business of Success By Media by freezing the assets of the company and its principals. as a result, the business operations of many who were selling the product of Success By Media has been effectively stopped.

The court installed a receiver with broad discretion to designate receivership entities that went beyond named

parties to the lawsuit. The receivership entities under the control of the receiver were not even allowed to choose their own counsel, the court designating the receiver as counsel for both the non-parties and the corporate defendants in the case, freezing the assets of corporate defendants, individual defendants (the principals of the corporate defendants), and non-party receivership entities.

The receiver was charged with preserving the assets of the corporate defendants, but the receivership fees are consuming the assets she is supposed to preserve so that there will be nothing left of the company by the time of trial.

The individual defendants are likewise left with nothing and, therefore, no ability to pay for their defense. Meanwhile, the FTC publishes press-releases and blog postings that defame the defendants in the case, pretty much ensuring, thereby, that the individual defendants have no future as entrepreneurs.

The actions of the FTC are impacting thousands of people in just this one case. Commissions for sales are due to 4,489 SBM affiliates. Doc. 178, 175.³ More than one-hundred declarations and letters have been filed by third-parties with the district court decrying the FTC's actions. These consumer are upset because the FTC interferes with their rights to be gainfully employed, running their own businesses by selling

³ This and similar citations are a reference to the docket number for filings in the Arizona case.

the product—coffee and nutraceuticals—that were marketed by Success By Media.

The declarations and other filings are by individuals who were achieving financial freedom and independence by working for themselves; meanwhile, the FTC decried assertion by Success By Media and its principals that one could become financially independent and self-sufficient as an unfair trade practice that should be eradicated. Eradicated even though the ones the FTC is supposedly protecting are the ones being damaged.

The FTC's seizure of assets, establishment of a receivership and effective shutdown of the business means the company will be left as an empty shell with no ability to pay the monetary restitution the FTC seeks as a part of its claim that it is entitled to an "injunction" under § 13(b) under the FTCA, which the FTC reads to allow the havoc being created by the seizure, receivership, and effects on non-parties.

B. Constitutional Imperatives

1. *First and Eighth Amendments.* The right to be represented in a proceeding is of Constitutional dimension. *See Walters v. National Ass'n of Radiation Survivors*, 473 U.S. 305 (1985). In criminal proceedings, that right is expressly protected by the Sixth Amendment. "[I]n civil disputes with the government . . . that right is protected by the Due Process clause of the Fifth Amendment and by the First Amendment." *Id.* at 370 (Stevens, J., dissenting). This court may not dictate

who may represent the Corporate Defendants in this case, nor, for that matter, a non-party entity that the receiver designated as a Receivership Entity. *Cole v. U.S. Dist Court for Dist. of Idaho*, 366 F.3d 813, 817 (9th Cir. 2004) (“Parties normally have the right to counsel of their choice”). “Some propositions are so obvious they seldom need to be stated explicitly.” *Walters* 473 U.S. at 368 n.16 (Stevens, J., dissenting). In a series of cases considering the extent to which the First Amendment protects a lawyer’s right to solicit business, “it was necessarily assumed that the individual’s right to ask for, and to receive, legal advice from the lawyer of his choice was fully protected by the First Amendment.” *Id.*, see *In re Primus*, 436 U.S. 412, 426 n.1 (1978) (“There is no doubt that such activity is protected under the First Amendment”). Moreover, the selection of counsel is fundamental to due process. The “right to be heard before being condemned to suffer grievous loss of any kind, even though it may not involve the stigma and hardships of a criminal conviction, is a principal basic to our society.” *Matthew v. Eldridge*, 424 U.S. 319, 333 (1976) (citing *Joint Anti-Fascist Comm. v. McGrath*, 341 U.S. 123, 168 (1951) (Frankfurter, J. concurring)). “The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.” *Id.* (citing *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965)). So, the district court’s order, disallowing choice of counsel to the entities controlled by the receiver runs afoul of the Constitution. *Walters v. National, supra*.

2. Unjoined parties’ rights are being affected.

The *amici* are not parties to the pending case in Arizona. The district court was asked and declined to join more than individuals because they have claims related to the subject matter of the litigation that as a practical matter are impaired or impeded by the FTC's lawsuit. *See* Fed. R. Civ. P. 19. These are individuals that include, *see* Doc. 167, law enforcement officers and investigators at state and federal level who are affiliated with Success By Health who have lost the ability to generate income by selling products supplied by Success By Health. They have lost additional income. This includes people who are making their living by selling the product that are now foreclosed from doing what they want to do. *Id.* It is people who were using the business operations supplied by Success By Health that have been shut down by the district court's injunctive order, the establishment of the receivership, and the receiver deciding what, when, and whether she will sell product. *Id.* It includes those who believe America should not have a government agency that can destroy their business opportunities without even talking to them. *Id.* Each of these individuals is affected because they are denied access to funds that they earn and have earned at Success By Media, but the United States District Court has denied their joinder under Rule 19, notwithstanding the force and effect of this rule. *See Republic of the Philippines v. Pimentel*, 553 U.S. 851 (2008).

It is not just the money that concerns the *amici*, it is their interest in jobs they have lost, their source of income. It is their right as affiliates to work as an affiliate to earn commission for sales of product in exchange for the right to

earn commissions on the sales of product that are paid by Success By Media. The relationship between the *amici* and those who must be joined but have not been joined in the district court is contractual, and therefore a property interest protected by the United States Constitution. *Board of Regents v. Roth*, 408 U.S. 564, 172 (1972).

The not-joined parties have an interest in the jobs they have lost, their source of income. It is their right as affiliates to continue to work as an affiliate to earn commissions for sales of product. The affiliates joined Success By Health in exchange for the right to commissions on sales of product. This relationship is contractual and, therefore, a property interest protected by the United States Constitution. *Board of Regents v. Roth*, 408 U.S. 564 (1972). As the *Roth* case makes clear, the terms *liberty* and *property* are broad, majestic terms that “relate to the whole domain of social and economic fact. *Id.* at 571.

The Court has also made clear that the property interests protected by procedural due-process extend well beyond actual ownership of real estate chattels or money. By the same token, the Court has required due process protection for deprivations of liberty beyond the sort of formal constraint imposed by the criminal process.

Id. at 571–572.

The liberty guaranteed by the Constitution cannot be

definitely stated, but it includes the right to engage in any of the sort of common occupations of life that are typical of someone living in a free society.

Without doubt [liberty] denotes not merely freedom from bodily restraint, but also *the right of the individual to contract to engage in any of the common occupations of life*, to acquire useful knowledge, to marry, establish a home and bring up children, to worship God according to the dictates of his own conscience, and generally to enjoy those privileges long recognized . . . as essential to the orderly pursuit of happiness by free men.

Meyer v. Nebraska, 262 U.S. 390, 399 (1923) (emphasis added).

The attributes of property interests protected by the Constitution is the interests that a person has upon which that person relies in daily life, a reliance that must not be arbitrarily undermined.

To have a property interest in a benefit, a person clearly must have more than an abstract need or desire for it. He must have more than a unilateral expectation of it. He must, instead, have a legitimate claim of entitlement to it. It is a purpose of the ancient institution of property

to protect those claims upon which people rely in their daily lives, reliance that must not be arbitrarily undermined. It is a purpose of the constitutional right to a hearing to provide an opportunity for a person to vindicate those claims.

Roth, supra, at 577.

What has happened in *Success By Media* violates the rights of all of the affiliates. It violates the property interests of the affiliates to not only the money they have earned, but also the right to continue their employment at Success By Health to earn money in their quest for happiness.

3. *Fourth Amendment.* The Fourth Amendment provides that the right of people to be secure “against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and *particularly describing the place to be searched, and the persons or things to be seized,*” U.S. CONST., amend IV (emphasis added), and it applies to the FTC. *Knoll Assocs., Inc. v. FTC*, 397 F.2d 530, 536 (7th Cir. 1968). The Fourth Amendment requires that the warrant itself, and not merely the supporting documents, must contain the particularized description of the place to be searched and the items to be seized. *Groh v. Ramirez*, 540 U.S. 551 (2004). Any “warrant that fails to conform to the particularity requirement of the Fourth Amendment is unconstitutional.” *Massachusetts v. Sheppard*, 468 U.S. 981, 988 n.5 (1984). The

Supreme Court has never held that the Fourth Amendment can be circumvented by appointing a receiver. *Contra FTC v. Pointbreak Media, LLC*, 343 F.Supp. 3d 1282 (S.D. Fal. 2018). Here, the FTC's TRO, acceded to by the court, authorized a general writ for the receiver to:

Take exclusive custody, control, and possession of all Assets and Documents of, or in the possession, custody, or under the control of, any Receivership Entity, wherever situated . . .

. . . .

Cooperate with reasonable requests for information or assistance from any state or federal civil or criminal law enforcement agency.

Doc. 21 at 16, 20.

The Fourth Amendment violations in this case go to the very heart of the founding of these United States. In 1765, lawyer James Otis denounced general writs as “the worst instrument of arbitrary power, the most destructive of English liberty and the fundamental principles of law, that ever was found in an English law book.” *Boyd v. United States*, 116 U.S. 616, 625 (1886), citing *Entick v. Carrington*, 19 How. St. Tr. 1029 (1765). The combination of the TRO and appointment of a receiver in this case is the functional equivalent of the Constitutionally-forbidden practice of issuing general writs.

The significance of *Entick* in this nation's history and the abuse of general writs cannot be overstated. John Adams, in commenting on the *Entick* case, observed, "Then and there, was the first scene of the first act of opposition to the arbitrary claims of Great Britain." *Id.*

4. *Fifth Amendment/Defamation.* The Fifth Amendment provides that no person shall "be deprived of life, liberty, or property, without due process of law." U.S. CONST., amend V. Here, the individual defendants have been deprived of property in at least two extra-judicial ways. First, the FTC published false statements about James Noland on its blog (FTC blog posts, Seena Gressin, FTC says "Success By Health" is a pyramid scheme, <https://www.consumer.ftc.gov/blog/2020/01/ftc-says-success-health-pyramid-scheme>, and <https://www.ftc.gov/news-events/blogs/business-blog/2020/01/ftc-alleges-success-health-pyramid-scheme>), and in its press releases (FTC press release, <https://www.ftc.gov/news-events/press-releases/2020/01/ftc-acts-shut-down-success-health-instant-coffee-pyramid-scheme>), neither of which is within the pale of protections afforded advocates in a court proceeding. The FTC said "two FTC cases announced today allege that Noland is back in the pyramid scheme business with a venture called 'Success by Health.'"

The second offence to due process is witnessed by the fact that the receiver in this case has openly declared that she sees no defense to the claims made by the FTC, and she is court appointed counsel for the corporate/receivership

entities. The receiver, then, has joined forces with the FTC and argues that the corporate defendants have violated the law. Doc 82-1, Receiver Report, ¶ 6 (Feb. 10, 2020) at 16; Doc 139-1, Receiver Report, ¶ 6 (May 12, 2020) at 11 (page 13 of 28 of Doc 139-1). The owners and officers of the corporate defendants are guilty by association.

There is an anomaly in the district court's injunction in Arizona. The injunction gives the receiver plenary power over Receivership Entities, but how, then, can a non-party object to the receiver's dragnet making that entity a *sub silentio* party to this case if it is the receiver who is in charge of the management and attorneys for the Receivership Entities?

5. *Eighth Amendment.* The Eighth Amendment proscribes excessive fines. U.S. CONST., amend VIII. This safeguard is “fundamental to our scheme of ordered liberty” and “deeply rooted in this Nation's history and tradition.” *McDonald v. Chicago*, 561 U.S. 742, 767 (2010). The Excessive Fines Clause traces its venerable lineage back at least to the *Magna Carta*, § 20, 9 Hen. III, ch. 14, in 1 Eng. Stat. at Large 5 (1225), which required that economic sanctions “be proportioned to the wrong” and “not be so large as to deprive [an offender] of his livelihood.” *Timbs v. Indiana*, 586 U.S. ___ 139 S. Ct. 682, 688 (2019) (a civil *in rem* action). The Supreme Court observed that “Exorbitant tolls undermine other constitutional liberties.” *Id.* at ___, 139 S.Ct. at 689. Here, the individual defendants are not seeking relief under the cruel and unusual clause, but the excessive fines clause. The FTC disgorges massive amounts of money and only

restores a pittance to consumers. In relative terms, 96% of payments may go to consumers, but in absolute terms, most of the money constitutes a fine against the FTC's targets. *See* STATS & DATA 2017-ANNUAL HIGHLIGHTS 2017, Fed. Trade Comm'n, <http://bit.ly/2mwz7sj>.

CONCLUSION

The FTC's calculated expansion of remedies available under § 13(b) of the FTCA are unbridled. They were not authorized by Congress. They violate Constitutional rights, affecting thousands of people who are left with no practical remedy. This court should rein in this runaway horse.

Respectfully submitted.

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