

November 20, 2018

Freedom of Information Act Request
Office of the General Counsel
US Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir/Madam:

This is a request under the Freedom of Information Act. I request that a copy of the following documents be provided to Veterans Education Success:

- All documents the FTC possesses regarding the names of any college, university, trade school, or other institute of higher-learning that were associated with, participated in, partnered with, contracted with, or paid for services from the lead generator websites recently shut down by the FTC in the September 6, 2018 Stipulated Final Orders and discussed in Commissioner Rohit Chopra's Statement, FTC Matter/File Number: 162 3211.¹
- All documents the FTC possesses naming any institution of higher-learning purchasing leads in conjunction with, or otherwise participating in or financially connected to, Fanmail.com, LLC; Lon Broliar; Andrew Dorman, and the lead generator websites they operated: www.army.com and www.air-force.com.
- All documents that the FTC possesses naming any institution of higher-learning purchasing leads related to, or otherwise participating in or financially connected to, SunKey Publishing, Inc.; Sun Key Publishing, LLC; Wheredata, LLC; Christopher Upp; Mark Van Dyke, and the lead-generator websites they operated: www.airguardenlist.com, www.coastguardenlist.com, www.army enlist.com, www.nationalguardenlist.com, www.airforceenlist.com, www.marineenlist.com, and www.navyenlist.com.

I request a waiver of all fees for this request. Disclosure of the requested information is in the public interest because it is likely to contribute significantly to public understanding of the operation of the government and is not primarily in our commercial interest as we are a nonprofit organization that advocates on behalf of veterans and their families. The information sought would illuminate which colleges were using lead generator sites that the FTC has shut down and which prompted Commissioner Chopra to state that these "[c]ompanies that prey on current and prospective service members not only harm military families, but also the broader American

¹ Stipulated Final Order for *United States v. Sunkey Publishing, Inc., et. al*, civil action no. 3:18-cv-14444-HNJ, N.D. Ala, September 6, 2018, available at https://www.ftc.gov/system/files/documents/cases/sunkey_proposed_order.pdf?utm_source=govdelivery; Stipulated Final Order for *United States v. Fanmail.com, LLC, et. al*, civil action no. 3:18-cv-14444-HNJ, N.D. Ala, September 6, 2018, available at https://www.ftc.gov/system/files/documents/cases/2-1_fanmail_proposed_order.pdf?utm_source=govdelivery; Statement by Commissioner Rohit Chopra, Joined by Commissioner Rebecca Kelly Slaughter, September 6, 2018, available at https://www.ftc.gov/system/files/documents/public_statements/1408028/1623211_sunkey_publishing_rc_and_rks_statement.pdf.

public.” Commissioner Chopra went on to support the release of this information, stating, “I believe it is in the public interest to disclose Defendants’ full list of purchasers of their leads . . .”

If the waiver of fees is not granted and fees exceed \$25, please contact me immediately. If you need to discuss this request, you can reach me at james@veteranseducationsuccess.org. Thank you for your consideration of our request.

Sincerely,

/s/ James Haynes

James Haynes, Law Fellow
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