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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

SEQUOIA ONE, LLC, a Wyoming limited liability company, GEN X MARKETING GROUP, LLC, a Florida limited liability company, JASON A. KOTZKER, THERESA D. BARTHOLOMEW, JOHN E. BARTHOLOMEW, JR., AND PAUL T. MCDONNELL,

Defendants.

CASE NO. 2:15-cv-01512-JCM-CWH

DECLARATION OF JASON A. KOTZKER IN SUPPORT OF MOTION TO STAY

I, JASON KOTZKER, declare as follows:

1. I am named as a defendant in the above-captioned civil action commenced by the FTC. I have firsthand personal knowledge of the facts set forth herein.

2. In early December 2014, I received a Grand Jury Subpoena addressed to Sequoia One, LLC from Assistant United States Attorney Christina Brown demanding the production of records relating to ProCheck LLC, Gareth David Long, and others.

3. On January 7, 2015, Postal Inspector Clayton Gerber and another Postal Inspector of the United States Postal Inspection Service appeared at my residence in Highlands Ranch, Colorado and requested that I submit to an interview. During the course of this interview which lasted approximately two hours, the Postal Inspectors asked me questions regarding, among other things, my relationships and dealings with the various individuals and entities including but not

1 limited to: (1) Theresa Bartholomew; (2) John E. Bartholomew, Jr.; (3) Paul T. McDonnell; (4)
2 Gen X Marketing Group, LLC; and (5) Sequoia One, LLC.

3 4. On January 22, 2015, I attended a proffer at the United States Attorney's Office in
4 Denver, Colorado which was attended by Assistant United States Attorney Christina Brown,
5 Department of Justice Trial Attorneys Josh Burke and David Frank, and Postal Inspector Gerber.
6 This proffer lasted for approximately 5 ½ hours and, during the proffer, I was asked questions
7 regarding, among other things, my involvement with: (1) Theresa Bartholomew; (2) John E.
8 Bartholomew, Jr.; (3) Paul T. McDonnell; (4) Gen X Marketing Group, LLC; and (5) Sequoia One
9 LLC.

10 I declare under penalty of perjury under the laws of the United States of America and the
11 State of Nevada that the foregoing is true and correct.

12
13 October 2, 2015

14 DATE

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JASON A. KOTZKER

CERTIFICATE OF SERVICE

In accordance with the Federal Rules of Civil Procedure and the Local Rules of Practice of the United States District Court for the District of Nevada, I certify that I am an employee of Fabian VanCott and that on this 2nd day of October, 2015, I did cause a true copy of:

DECLARATION OF JASON A. KOTZKER IN SUPPORT OF MOTION TO STAY
to be served via electronic service by the U.S. District Court CM/ECF system to the parties on the Electronic Filing System in this action.

By: /s/ Sara M. Cameron
An Employee of
Fabian VanCott