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Attorneys for Michael Dunn, Receiver

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

AUTOMATORS LLC, *et al.*

Defendants,

PEREGRINE WORLDWIDE, LLC,

Relief Defendant.

CASE NO. 23-cv-1444-BAS-KSC

**CORRECTED
NOTICE OF TEMPORARY
RECEIVER’S DETERMINATION
REGARDING ADDITIONAL
RECEIVERSHIP ENTITY**

Date:
Time:
Dept.
Judge: Hon. Cynthia Bashant

Pursuant to this Court’s *Order (1) Granting Ex Parte Application For Temporary Restraining Order With Asset Freeze, Appointment of a Temporary Receiver, and other Equitable Relief (ECF No. 5), (2) Directing Defendants to Show Cause Why Preliminary Injunction Should Not Issue, and (3) Setting Preliminary Injunction Hearing and Briefing Schedule* dated August 11, 2023 (the “Order” or

1 “TRO”) (ECF No. 8), the Court directed the Receiver to determine if any non-
2 Defendant corporate entities are “Receivership Entities” as defined in the Order.

3 More specifically, the Order provides “If the Receiver identifies a nonparty
4 entity as a Receivership Entity, promptly notify the entity as well as the parties, and
5 inform the entity that it can challenge the Receiver's determination by filing a motion
6 with the Court. *Provided*, however, that the Receiver may delay providing such notice
7 until the Receiver has established control of the nonparty entity and its assets and
8 records, if the Receiver determines that notice to the entity or the parties before the
9 Receiver establishes control over the entity may result in the destruction of records,
10 dissipation of assets, or any other obstruction of the Receiver's control of the entity;”
11 Order, Section XII (U).

12 After investigation, the Receiver has determined that Wize Mate, LLC, a
13 Nevada limited liability company (“Wize Mate”), should be designated as a
14 Receivership Entity and should be treated as such moving forward. As such, notice is
15 hereby given to Wize Mate that it may challenge Receiver’s determination by filing a
16 motion with the Court.

17 **A. Wize Mate, LLC (“Wize Mate”)**

18 In his initial review of the electronic records for the Defendants, the Receiver
19 has identified an account for Automators, LLC at Wells Fargo Bank. The Receiver
20 has only been able to recover five months of bank activity for this account (February
21 1, 2023 – June 30, 2023). Despite the limited records provided by the Defendants to
22 the Receiver to date, the Receiver and his professionals in their financial analysis
23 identified that funds that are deposited into the Automators LLC account are generally
24 disbursed to (1) Roman Cresto, (2) John Cresto, and (3) an entity called Wize Mate,
25 LLC. The transfers by Automators to Wize Mate during the above five (5) month
26 period total over \$133,000 and are detailed in the schedule attached hereto as **Exhibit**
27 **“A”**.

28

1 According to the Nevada Secretary of State website, Wize Mate is an active
2 entity formed and registered in Nevada on August 26, 2022. Andrew Chapman is
3 listed as the Managing Member of this entity. Wize Mate’s entity details with the
4 Nevada Secretary of State are attached hereto as **Exhibit “B”**.

5 According to the business bank account application attached hereto as **Exhibit**
6 **“C”**, Wize Mate is solely owned and controlled by Mr. Chapman and in substantially
7 the same business as the Receivership Entities.

8 Because this entity has conducted business related to the marketing or sale of
9 Defendants’ Products, including receipt of Assets derived from any activity that is the
10 subject of the Complaint in this matter, and the Receiver has determined is controlled
11 and owned by Defendant Chapman, the Receiver submits that Wize Mate LLC is one
12 of the Receivership Entities, subject to the provisions of the TRO Order, Definitions
13 (M).

14 The Receiver has identified additional entities that may constitute additional
15 Receivership Entities but his investigation into those entities remains ongoing.

16
17 Dated: August 22, 2023

SULLIVAN HILL REZ & ENGEL
A Professional Law Corporation

18
19
20 By: _____
21 James P. Hill
22 Christopher V. Hawkins
23 Attorneys for Michael Dunn, Receiver
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EXHIBIT A

Exhibit A

Transfers from Automators to Wize Mate

(February 1, 2023 – June 30, 2023)

Date	Amount
02/13/23	\$ 9,570.00
02/28/23	5,600.00
03/27/23	8,800.00
04/04/23	18,000.00
04/05/23	8,000.00
04/11/23	8,400.00
04/14/23	30,800.00
05/05/23	17,570.00
05/30/23	8,570.00
06/29/23	17,975.00
TOTAL	\$ 133,285.00

EXHIBIT B

Business Account Application



Bank Name: WELLS FARGO BANK, N.A.		Branch Name: RANCHO SANTA FE	
Banker Name: ANTHONY JUAREZ	Officer/Portfolio Number: A6548	Date: 02/13/2023	
Banker Phone: 858/756-4480	Branch Number: 04431	Banker AU: 0000682	Banker MAC: E2456-011

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

New Account Information

New Deposit Account(s) Only New Deposit Account(s) and Business Credit Card

Account 1 Product Name: Navigate Business Checking			Purpose of Account 1: General Operating Account	
COID: 114	Product: DDA	Account Number: [REDACTED]	Opening Deposit: \$100.00	Type of Funds: CACK

New Account Kit: [REDACTED]	Checking/Savings Bonus Offer Available: NO
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Related Customer Information

Customer 1 Name: WIZE MATE LLC	
Enterprise Customer Number (ECN): 334621841821711	Account Relationship: Sole Owner
Customer 2 Name: ANDREW E CHAPMAN	
Enterprise Customer Number (ECN): [REDACTED]	Account Relationship: Signer

Checking/Savings Statement Mailing Information

Name(s) and Information Listed on Statement: WIZE MATE LLC	Statement Mailing Address: [REDACTED]	
	Address Line 2:	
	City: CARDIFF	State: CA
	ZIP/Postal Code: 92007-1843	Country: US



Customer 1 Information

Customer Name: WIZE MATE LLC			
Enterprise Customer Number (ECN): [REDACTED]		Street Address: [REDACTED]	
Account Relationship: Sole Owner		Address Line 2:	
Taxpayer Identification Number (TIN): [REDACTED]		Address Line 3:	
TIN Type: EIN			
Business Type: Limited Liability Company		City: LAS VEGAS	State: NV
Business Sub-Type/Tax Classification: S Corporation		Non-Profit: No	ZIP/Postal Code: 89102-4397
Country: US	Date Originally Established: 08/26/2022	Current Ownership Since:	Number of Employees: 1
Fax:	Business Phone: [REDACTED]	Annual Gross Sales: \$1,000,000.00	Year Sales Reported: 02/13/2020
Fiscal Year End:	Cellular Phone:	Pager:	e-Mail Address:
Primary Financial Institution:	Number of Locations: 1	Primary State 1: NV	Primary State 2:
Primary State 3:	Primary State 2:	Primary State 3:	Website:
Primary Country 1: US	Primary Country 2:	Primary Country 3: US	Sales Market: NATIONAL
Industry: Information/Media			
Description of Business: ONLINE MARKETING PLATFORM			
Major Suppliers/Customers:			

Bank Use Only

Name/Entity Verification: Secretary of State		Address Verification: NONE	
BACC Reference Number: 6230440000827			
Document Filing Number/Description: 20222572002	Filing Country: US	Filing State: NV	Filing Date: 08/26/2022
Expiration Date:	Country of Registration: US	State of Registration: NV	International Transactions:
Check Reporting: NO RECORD			



Owner/Key Individual 1 Information

Customer Name: ANDREW E CHAPMAN			Residence Address: [REDACTED]		
Business Relationship: Owner with Control of the Entity			Address Line 2:		
Position/Title:	Date of Birth:	Percent of Ownership:	Address Line 3:		
	04/16/1988	100.0			
Enterprise Customer Number (ECN): [REDACTED]			City:	State:	
			CARDIFF BY THE SEA	CA	
TIN Type:	Taxpayer Identification Number (TIN):		ZIP/Postal Code:	Country:	
SSN	[REDACTED]-8258		92007-2414	US	
Primary ID Type:	Primary ID Description:		Country of Citizenship:	Permanently Resides in US:	
PASP	535038391		US		
Primary ID St/Ctry/Prov:	Primary ID Issue Date:	Primary ID Expiration Date:	Check Reporting:		
US	07/02/2015	07/01/2025			
Secondary ID Type:	Secondary ID Description:				
OTHR CC	TRUIST VISA 6208				
Secondary ID State/Country:	Secondary ID Issue Date:	Secondary ID Expiration Date:			
		05/01/2026			

Authorized Signer 1 Information

Authorized Signer Name: ANDREW E CHAPMAN			Residence Address: [REDACTED]		
Occupation: Executive, Professiona			Address Line 2:		
Date of Birth:	Position/Job Title:		Address Line 3:		
[REDACTED]	MANAGING PARTNE				
Taxpayer Identification Number (TIN):	TIN Type:		City:	State:	
[REDACTED]-8258	SSN		CARDIFF BY THE SEA	CA	
Primary ID Type:	Primary ID Description:		ZIP/Postal Code:	Country:	
PASP	535038391		92007-2414	US	
Primary ID Expiration Date:	Primary ID St/Ctry/Prov:	Primary ID Issue Date:	Permanently Resides in US:	Country of Citizenship:	
07/01/2025	US	07/02/2015		US	
Secondary ID Description:		Secondary ID Type:			
TRUIST VISA 6208		OTHR CC			
Secondary ID State/Country:	Secondary ID Issue Date:	Secondary ID Expiration Date:			
		05/01/2026			



2W02-001390814046-03

Certificate of Authority

Each person who signs the "Certified/Agreed To" section of this Application certifies that:

- A. The Customer's use of any Wells Fargo Bank, N.A. ("Bank") deposit account, product or service will confirm the Customer's receipt of, and agreement to be bound by, the Bank's applicable fee and information schedule and account agreement that includes the Arbitration Agreement under which any dispute between the Customer and the Bank relating to the Customer's use of any Bank deposit account, product or service will be decided in an arbitration proceeding before a neutral arbitrator as described in the Arbitration Agreement and not by a jury or court trial.
- B. Each person who signs the "Certified/Agreed To" section of this Application or whose name, any applicable title and specimen signature appear in the "Authorized Signers - Signature Capture" section of this Application is authorized on such terms as the Bank may require to:
 - (1) Enter into, modify, terminate and otherwise in any manner act with respect to accounts at the Bank and agreements with the Bank or its affiliates for accounts and/or services offered by the Bank or its affiliates (other than letters of credit or loan agreements);
 - (2) Authorize (by signing or otherwise) the payment of Items from the Customer's account(s) listed on this Business Account Application (including without limitation any Item payable to (a) the individual order of the person who authorized the Item or (b) the Bank or any other person for the benefit of the person who authorized the Item) and the endorsement of Deposited Items for deposit, cashing or collection (see the Bank's applicable account agreement for the definitions of "Item" and "Deposited Item");
 - (3) Give instructions to the Bank in writing (whether the instructions include the manual signature or a signature that purports to be the facsimile or other mechanical signature including a stamp of an Authorized Signer as the Customer's authorized signature without regard to when or by whom or by what means or in what ink color the signature may have been made or affixed), orally, by telephone or by any electronic means in regard to any Item and the transaction of any business relating to the Customer's account(s), agreements or services, and the Customer shall indemnify and hold the Bank harmless for acting in accordance with such instructions; and
 - (4) Delegate the person's authority to another person(s) or revoke such delegation, in a separate signed writing delivered to the Bank.
- C. If a code must be communicated to the Bank in order to authorize an Item, and the code is communicated, the Item will be binding on the Customer regardless of who communicated the code.
- D. Each transaction described in this Certificate of Authority conducted by or on behalf of the Customer prior to delivery of this Certificate is in all respects ratified.
- E. If the Customer is a tribal government or tribal government agency, the Customer waives sovereign immunity from suit with respect to the Customer's use of any Bank account, product or service referred to in this Certificate.
- F. The information provided in this Application is correct and complete, each person who signs the "Certified/Agreed To" section of this Application and each person whose name appears in the "Authorized Signers-Signature Capture" section of this Application holds any position indicated, and the signature appearing opposite the person's name is authentic.
- G. The Customer has approved this Certificate of Authority or granted each person who signs the "Certified/Agreed To" section of this Application the authority to do so on the Customer's behalf by:
 - (1) resolution, agreement or other legally sufficient action of the governing body of the Customer, if the Customer is not a trust or a sole proprietor;
 - (2) the signature of each of the Customer's trustee(s), if the Customer is a trust; or
 - (3) the signature of the Customer, if the Customer is a sole proprietor.

Certified/Agreed To

Owner/Key Individual 1 Name

ANDREW E CHAPMAN

Position/Title:

Owner/Key Individual 1 Signature

ANDREW E CHAPMAN



Submit manually

Signature not required

Date:

02/13/2023



Request for Taxpayer Identification Number and Certification

(Substitute Form W-9)

Under penalties of perjury, I certify that:

- 1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
- 2. UNLESS I HAVE CHECKED THE BOX BELOW, I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- 3. I am a U.S. citizen or other U.S. person; and
- 4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct. (This does not apply to accounts maintained in the United States.)

I am subject to backup withholding because the statement in 2(b) above does not apply.

Tax Responsible Customer Name:

WIZE MATE LLC

Taxpayer Identification Number (TIN):

[REDACTED]

Note: The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

TIN Certification Signature:

ANDREW E CHAPMAN


- Submit manually
- Signature not required

Date:
02/13/2023

Authorized Signers - Signature Capture

Authorized Signer 1 Name

ANDREW E CHAPMAN

Position/Title:

Authorized Signer 1 Signature

ANDREW E CHAPMAN


- Submit manually
- Signature not required

Date:
02/13/2023



ENTITY INFORMATION

ENTITY INFORMATION

Entity Name:

WIZE MATE LLC

Entity Number:

E25720012022-9

Entity Type:

Domestic Limited-Liability Company (86)

Entity Status:

Active

Formation Date:

08/26/2022

NV Business ID:

NV20222553432

Termination Date:

Perpetual

Annual Report Due Date:

8/31/2023

Series LLC:

Restricted LLC:

REGISTERED AGENT INFORMATION

Name of Individual or Legal Entity:

Registered Agent Solutions, Inc

Status:

Active

CRA Agent Entity Type:

Registered Agent Type:

Commercial Registered Agent

NV Business ID:

Office or Position:

Jurisdiction:

Street Address:

4625 West Nevso Drive, Suite 2, Las Vegas, NV, 89103, USA

Mailing Address:

Individual with Authority to Act:

Registered Agent Solutions, Inc.

Fictitious Website or Domain Name:

OFFICER INFORMATION

VIEW HISTORICAL DATA

Title	Name	Address	Last Updated	Status
Managing Member	Andrew Chapman	[REDACTED]	08/26/2022	Active

Page 1 of 1, records 1 to 1 of 1

[Filing History](#)

[Name History](#)

[Mergers/Conversions](#)