

Exhibit B

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Federal Trade Commission,

Plaintiff,

vs.

James D. Noland, Jr. et al.,

Defendants.

Case No. 2:20-cv-00047-DWL

**INTERVENORS CLASS ACTION
COMPLAINT IN INTERVENTION FOR
DECLARATORY JUDGMENT**

**Jo Dee Baer, Robert Mehler, Dr. Jeffrey
Wright, Dr. Carol Magda, Dr. John Davis,
Tevis Sherfield, Brooke Sherfield, Tyler
Sherfield, Carleigh Sherfield, Melanie
Summers, Richard Summers, Jill Boone,
April Brown, Scott Cunningham, Reverend
James Irving, Rhonda Wright, Buddy
Wright, Mike King, Jeff Brown, Raquel
Crawford, James McKee, Clayton Miller,
Robert Baird, Ronnie McHaffie, Jerry
Ayers, Joseph Farley, Kara Kennedy,
Sherry Harrod, Dwayne Hosey, Britney
Pineau, Debby Armentrout, and Linda Huff,
on behalf of themselves and others similarly
situated,**

Plaintiffs - Intervenors,

vs.

Federal Trade Commission,

Defendant.

1 Intervenor Plaintiffs Jo Dee Baer, Robert Mehler, Dr. Jeffrey Wright, Dr. Carol Magda,
2 Dr. James Marinakis, Dr. John Davis, Tevis Sherfield, Brooke Sherfield, Tyler Sherfield,
3 Carleigh Sherfield, Melanie Summers, Richard Summers, Jill Boone, April Brown, Scott
4 Cunningham, Reverend James Irving, Rhonda Wright, Buddy Wright, Mike King, Jeff Brown,
5 Raquel Crawford, James McKee, Clayton Miller, Robert Baird, Ronnie McHaffie, Jerry Ayers,
6 Joseph Farley, Kara Kennedy, Sherry Harrod, Dwayne Hosey, Britney Pineau, Debby
7 Armentrout, and Linda Huff, on behalf of themselves together with the additional affiliates of
8 Success By Health (“SBH”)¹ named in Exhibit A (“Intervenor Plaintiffs”), on behalf of
9 themselves as intervenors and others similarly situated, bring this Complaint in Intervention for
10 Declaratory Judgment and Related Injunctive Relief on their own behalf and as representatives
11 for the putative class of SBH affiliates against Defendant Federal Trade Commission (“the
12 FTC”) seeking a declaration that Plaintiffs’ contractual agreements with SBH are legally valid,
13 binding, and enforceable, and that Plaintiffs are constitutionally entitled to the performance of
14 their contracts with SBH, and to receive the benefits of their status as affiliates of SBH to which
15 they are entitled, without further interference from the FTC, and for appropriate modification of
16 the existing orders of this Court to accomplish the requested relief.
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21 **The Parties**

22 1. Plaintiff Jo Dee Baer is an adult individual and a citizen of Florida, residing at
23 9247 San Jose Boulevard, Howey in the Hills, Florida 34737.
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28 ¹ As used herein, “Success By Health” and “SBH” refer to any or all of the corporate defendants in the FTC Action, as defined herein, with whom Plaintiffs have contractual agreements as SBH affiliates.

1 2. Plaintiff Baer is, among other things, a certified health and wellness coach and
2 holistic nutritionist.

3
4 3. In addition, Plaintiff Baer holds a Masters degree from the University of
5 Minnesota and a Masters of Business Administration degree from Georgia State University.

6 4. Plaintiff Baer has been an affiliate of SBH since August 2017.

7 5. Plaintiff Robert Mehler is an adult individual and a citizen of California, residing
8 at 250 Wild Rose Lane, Paso Robles, California, 93446.

9
10 6. Plaintiff Mehler is, among other things, an experienced executive in sales,
11 marketing, and supply chain logistics, with experience in consumer product companies such as
12 Equinox International, PepsiCo, and Gallo Wines.

13 7. In additional, Plaintiff Mehler holds a Masters of Business Administration degree
14 from the Wharton School at the University of Pennsylvania.

15 8. Plaintiff Mehler has been an affiliate of SBH since August 2017.

16 9. Plaintiff Dr. Jeffrey Wright is an adult individual and a citizen of Utah, residing at
17 1411 N. 199 W, Provo, Utah 84604.
18

19 10. Plaintiff Wright is, among other things, a naturopathic physician with over 17
20 years of experience in naturopathic medicine.
21

22 11. Plaintiff Wright has been an affiliate of SBH since January 2018.

23 12. Plaintiff Dr. Carol Magda is an adult individual and a citizen of Ontario, Canada,
24 residing at 92 41st Street North, Wasaga Beach, Ontario L9Z 1Z6, Canada.
25

26 13. Plaintiff Magda is, among other things, a naturopathic physician with 20 years of
27 experience in naturopathic medicine.

28 14. Plaintiff Magda has been an affiliate of SBH since September 2018.

1 15. Plaintiff Dr. James Marinakis is an adult individual and citizen of Florida, residing
2 at 12225 – 200th Street, Boca Raton, FL 33498.

3
4 16. Plaintiff Dr. Marinakis is, among other things, a world renowned homeopathic-
5 naturopathic doctor with over 40 years of experience.

6 17. Plaintiff Dr. Marinakis has been an affiliate of SBH since September 2017.

7 18. Plaintiff Dr. John Davis is an adult individual and a citizen of Colorado, residing
8 at 6520 Old Ranch Road, Colorado Springs, Colorado 80908.

9
10 19. Plaintiff Davis is, among other things, a licensed chiropractor with over 13 years
11 of experience in chiropractic care.

12 20. Plaintiff Davis has been an affiliate of SBH since May 2018.

13 21. Plaintiff Tevis Sherfield is an adult individual and citizen of Nevada, residing at
14 2825 Bluegrass Lane, #102, Henderson, Nevada 89074.

15
16 22. Plaintiff Tevis Sherfield is, among other things, a graduate of the University of
17 Tennessee Health Science Center with a doctor of physical therapy degree.

18 23. Plaintiff Tevis Sherfield has been an affiliate of SBH since September 2017.

19
20 24. Plaintiff Brooke Sherfield is an adult individual and citizen of Nevada, residing at
21 2825 Bluegrass Lane, #102, Henderson, Nevada 89074.

22 25. Plaintiff Brooke Sherfield is, among other things, an entrepreneur and professional
23 photographer.

24 26. Plaintiff Brooke Sherfield has been an affiliate of SBH since September 2017.

25
26 27. Plaintiff Tyler Sherfield is an adult individual and citizen of Nevada, residing at
27 2825 Bluegrass Lane, #102, Henderson, Nevada 89074.

1 28. Plaintiff Tyler Sherfield is, among other things, a graduate of the University of
2 Tennessee Health Science Center with a doctor of physical therapy degree.

3 29. Plaintiff Tyler Sherfield has been an affiliate of SBH since September 2017.

4 30. Plaintiff Carleigh Sherfield is an adult individual and citizen of Nevada, residing
5 at 2825 Bluegrass Lane, #102, Henderson, Nevada 89074.

6 31. Plaintiff Carleigh Sherfield is, among other things, a certified physician assistant.

7 32. Plaintiff Carleigh Sherfield has been an affiliate of SBH since September 2017.

8 33. Plaintiff Melanie Summers is an adult individual and citizen of Arizona, residing
9 at 2949 S. Country Club Way Tempe, Arizona 85282.

10 34. Plaintiff Melanie Summers is, among other things, a retired teacher.

11 35. Plaintiff Melanie Summers has been an affiliate of SBH since September 2019.

12 36. Plaintiff Richard Summers is an adult individual and citizen of Arizona, residing
13 at 2949 S. Country Club Way Tempe, Arizona 85282.

14 37. Plaintiff Richard Summers is, among other things, an semi-conductor engineer.

15 38. Plaintiff Richard Summers has been an affiliate of SBH since September 2019.

16 39. Plaintiff Jill Boone is an adult individual and citizen of Kentucky, residing at 3849
17 Still Meadow Lane, Lexington, Kentucky 40509.

18 40. Plaintiff Boone is, among other things, a former registered nurse and now full-
19 time network marketing professional.

20 41. Plaintiff Boone has been an affiliate of SBH since June 2019.

21 42. Plaintiff Judith April Brown is an adult individual and citizen of Kentucky,
22 residing at 2956 Majestic View Walk, Lexington, Kentucky 40511.

1 43. Plaintiff Brown is, among other things, a retired lieutenant colonel of the Kentucky
2 National Guard and law enforcement officer.

3
4 44. Plaintiff Brown has been an affiliate of SBH since July 2019.

5 45. Plaintiff Scott Cunningham is an adult individual and citizen of Arizona, residing
6 at 24654 N. Lake Pleasant Parkway, #103169, Peoria, Arizona 85383.

7 46. Plaintiff Cunningham is, among other things, a law enforcement officer.

8 47. Plaintiff Cunningham has been an affiliate of SBH since January 2018.

9
10 48. Plaintiff Reverend James Irving is an adult individual and citizen of Florida,
11 residing at 16 Roberts Street Umatilla, Florida 32784.

12 49. Plaintiff Irving is, among other things, a pastor.

13 50. Plaintiff Irving has been an affiliate of SBH since February 2019.

14
15 51. Plaintiff Rhonda Wright is an adult individual and citizen of Texas, residing at 186
16 Rainbow Drive, #8643, Livingston, Texas 77399.

17 52. Plaintiff Rhonda Wright is, among other things, a cafeteria supervisor.

18 53. Plaintiff Rhonda Wright has been an affiliate of SBH since December 2017.

19
20 54. Plaintiff Buddy Wright is an adult individual and citizen of Texas, residing at 186
21 Rainbow Drive, #8643, Livingston, Texas 77399.

22 55. Plaintiff Buddy Wright is, among other things, a physical education teacher and
23 sports coach.

24 56. Plaintiff Buddy Wright has been an affiliate of SBH since December 2017.

25
26 57. Plaintiff Mike King is an adult individual and citizen of Maryland, residing at 108
27 Charmuth Road, Lutherville, Maryland 21093.

28 58. Plaintiff King is, among other things, a network engineer.

1 59. Plaintiff King has been an affiliate of SBH since September 2017.

2 60. Plaintiff Jeff Brown is an adult individual and citizen of Florida, residing at 750
3 S. Dixie Highway, Boca Raton, Florida 33432.
4

5 61. Plaintiff Brown is, among other things, a respected and highly-rated trial lawyer.

6 62. Plaintiff Brown has been an affiliate of SBH since October 2019.

7 63. Plaintiff Raquel Crawford is an adult individual and citizen of Arizona, residing
8 at 7389 W. Tombstone Trail, Peoria, Arizona 85383.
9

10 64. Plaintiff Crawford is, among other things, a widow and single parent, and is also
11 legally deaf.

12 65. Plaintiff Crawford has been an affiliate of SBH since December 2019.

13 66. Plaintiff James McKee is an adult individual and citizen of Arizona, residing at
14 8421 N 56th Drive, Glendale, Arizona 85302.
15

16 67. Plaintiff McKee is, among other things, a former computer engineer, and is legally
17 blind.
18

19 68. Plaintiff McKee has been an affiliate of SBH since November 2017.

20 69. Plaintiff Clayton Miller is an adult individual and citizen of Iowa, residing at 2196
21 560th St. SW, Kalona, Iowa 52247.

22 70. Plaintiff Miller is, among other things, an equine posture therapist.

23 71. Plaintiff Miller has been an affiliate of SBH since May 2019.

24 72. Plaintiff Robert Baird is an adult individual and citizen of Florida, residing at
25 39076 Rose Street, Umatilla, Florida 32784.
26

27 73. Plaintiff Baird is, among other things, a business owner, the proprietor of Robert
28 Baird Repair Service.

1 74. Plaintiff Baird has been an affiliate of SBH since January 2019.

2 75. Plaintiff Ronnie McHaffie is an adult individual and citizen of Missouri, residing
3 at 158 Ricks Dr., Fordland, Missouri 65652.
4

5 76. Plaintiff McHaffie is, among other things, a professional truck driver.

6 77. Plaintiff McHaffie has been an affiliate of SBH since April 2018.

7 78. Plaintiff Jerry Ayers is an adult individual and citizen of Kansas, residing at 508
8 Delia Ave, Minneapolis, Kansas 67467.
9

10 79. Plaintiff Ayers is, among other things, a production manager and agricultural
11 manager.

12 80. Plaintiff Ayers has been an affiliate of SBH since November 2017.

13 81. Plaintiff Joseph Farley is an adult individual and citizen of Missouri, residing at
14 1945 Pleasant Valley Drive, Galena, Missouri 65656.
15

16 82. Plaintiff Farley is, among other things, a small business owner in the concrete and
17 construction business.

18 83. Plaintiff Farley has been an affiliate of SBH since February 2018.

19 84. Plaintiff Kara Kennedy is an adult individual and citizen of Tennessee, residing at
20 4510 Charlotte Avenue, #314, Nashville, Tennessee 37209.
21

22 85. Plaintiff Kennedy is, among other things, a director of public relations.

23 86. Plaintiff Kennedy has been an affiliate of SBH since May 2019.

24 87. Plaintiff Sherry Harrod is an adult individual and citizen of Kentucky, residing at
25 706 River Ridge, Frankfort, Kentucky 40601.
26

27 88. Plaintiff Harrod is, among other things, a retired network manager and engineer
28 from the state government of the Commonwealth of Kentucky.

1 89. Plaintiff Harrod has been an affiliate of SBH since June 2018.

2 90. Plaintiff Dwayne Hosey is an adult individual and citizen of Nebraska, residing at
3 8089 Dorcas St., Omaha, Nebraska 68124.
4

5 91. Plaintiff Hosey is, among other things, a retired Major League Baseball player and
6 the owner of the Hosey Baseball Training Center.

7 92. Plaintiff Hosey has been an affiliate of SBH since October 2017.

8 93. Plaintiff Britney Pineau is an adult individual and citizen of Texas, residing at 128
9 Guaro Trail, Georgetown, Texas 78626.
10

11 94. Plaintiff Pineau is, among other things, a veteran of the United States Army.

12 95. Plaintiff Pineau has been an affiliate of SBH since September 2017.

13 96. Plaintiff Debby Armentrout is an adult individual and citizen of Georgia, residing
14 at 13185 Bethany Road, Milton, Georgia 30009.
15

16 97. Plaintiff Armentrout is, among other things, a United States naval officer's wife
17 and network marketing professional.

18 98. Plaintiff Armentrout has been an affiliate of SBH since September 2017.

19 99. Plaintiff Linda Huff is an adult individual and citizen of Florida, residing at 16
20 Eugene Place, St. Augustine, Florida 32080.
21

22 100. Plaintiff Huff is, among other things, a retired Master Sergeant of the United States
23 Army National Guard, and a non-profit executive.
24

25 101. Plaintiff Huff has been an affiliate of SBH since November 2017.

26 102. Defendant the FTC is, upon information and belief, an agency of the United States
27 government headquartered at 600 Pennsylvania Avenue NW, Washington, DC 20580, and with
28 a regional office at 10990 Wilshire Boulevard, Suite 400, Los Angeles, CA 90024.

1 **Jurisdiction and Venue**

2 103. This Court has jurisdiction over this matter pursuant to 5 U.S.C. § 702.

3 104. This Court is empowered to decide the claim set forth herein pursuant to 28 U.S.C.
4 § 2201.
5

6 105. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2), as Intervenor-Plaintiffs’ claim
7 herein arises from the FTC bringing an action against SBH in this Court and seeking relief from
8 this Court which has interfered with Plaintiffs’ receipt of the benefits of their constitutional
9 rights and contractual relationships with SBH.
10

11 **Factual Background**

12 106. On January 12, 2020, the FTC initiated this action against James D. Noland, Jr.
13 and other individuals and entities associated with SBH.
14

15 107. In this action, the FTC has falsely claimed that SBH operates an illegal “pyramid
16 scheme.”

17 108. In this action, the FTC applied for, and has obtained, a Preliminary Injunction
18 which greatly restricts SBH’s activities and operations, which directly affects SBH’s affiliates,
19 including Plaintiffs.
20

21 109. As noted above, each of Plaintiffs is an affiliate.

22 110. As used herein, “affiliate” refers to individuals who have contracted with SBH to
23 market, distribute, and/or sell SBH’s products.
24

25 111. SBH’s products include, but are not limited to, nutraceutical coffees, teas, and
26 supplements derived from Ganoderma mushrooms.
27
28

1 112. As the above-stated list of Plaintiffs illustrates, SBH’s affiliates represent a wide
2 range of people, from diverse backgrounds, walks of life, education levels, and professional
3 experience.
4

5 113. In Plaintiffs’ experience, SBH is not an illegal “pyramid scheme” but rather an
6 honest and straightforward commercial enterprise.

7 114. None of Plaintiffs—nor, upon information and belief, any of SBH’s thousands of
8 other affiliates, past and present—experienced any deception on the part of SBH in connection
9 with SBH’s business model, or the advertising or marketing of its products, nor in any promises
10 by SBH of specific financial results that would be achieved from becoming affiliates of SBH.
11

12 115. The FTC’s allegations in this action are false.

13 116. Plaintiffs have experienced firsthand both the benefits of SBH’s products and
14 becoming affiliates of SBH, including the income stream that being an affiliate provides, as well
15 as discounted access to SBH’s products, of which Plaintiffs and many SBH affiliates are
16 consumers themselves.
17

18 117. SBH never promised Plaintiffs or, upon information and belief, any other SBH
19 affiliates that they would “get rich quick” from being affiliates of SBH, and in fact *routinely*
20 *emphasized that there are no guarantees in sales and network marketing.*
21

22 118. As with any commission-based sales enterprise, any individual’s income is
23 dependent on the volume of product an individual sells to consumers, in addition to override
24 commissions from sales by an individual’s team members.
25

26 119. SBH is not deceptive to its affiliates about the income potential and work
27 necessary to realize maximum income potential from affiliation with SBH.
28

1 120. Over 1,000 SBH affiliates have signed a petition in support of SBH and which
2 fundamentally challenges the accuracy of the FTC’s allegations in this case. *See*
3 <http://www.change.org/ftc-action> (last visited Feb. 10, 2021).
4

5 121. Among the benefits each of the Plaintiffs are contractually entitled from SBH are
6 access to SBH products (i.e., inventory), discounts on products whether for personal use or sale,
7 and ongoing training to improve their sales techniques and increase their personal income
8 through increased sales.
9

10 122. As noted above, each of Plaintiffs is entitled to—and desires to continue
11 receiving—the benefits of their affiliation with SBH.

12 123. The list of nearly 1,000 SBH affiliates who engaged counsel to intervene in this
13 lawsuit (a number which, Intervenor’s note, grows on a daily basis) and to bring this complaint
14 to protect their interests is, in and of itself, compelling evidence that the FTC does not speak for
15 the SBH affiliates, and that contrary to the FTC’s “we know better” approach, SBH’s affiliates
16 have been harmed not by any act, omission, or statement by SBH or any of the original
17 defendants in this action, but rather have been harmed by the FTC’s overreach and interference
18 with their SBH affiliation.
19
20

21 124. Since the filing of this action by the FTC, Plaintiffs and thousands of other SBH
22 affiliates, have been deprived of the benefits of their status as affiliates of SBH and pursuant to
23 their contractual agreements with SBH, including access to health-related products that SBH
24 sells.
25

26 125. For example, upon information and belief, the court-appointed receiver in this
27 case, operating in the interest and at the direction of the FTC, and not SBH’s affiliates (the
28 supposed “victims” in this matter), has cut off affiliates’ access to and inventory of in-demand

1 products through shipping delays and failure to replenish inventory, harming affiliates' ability
2 to transact their business and deliver products to consumers; failed to pay commissions that were
3 earned by Plaintiffs and other affiliates; inappropriately discounted (and thereby devalued) SBH
4 products; and misled affiliates in communications.
5

6 126. The receiver's May 11, 2020 email also indicated that the receiver had "full
7 control" over SBH's business, and that SBH under the receivership would "not follow a
8 multilevel marketing structure or commission program for any product sales," effectively
9 terminating the affiliates' income stream from selling SBH products.
10

11 127. In addition, under the receivership, the SBH website for direct sales to consumers
12 (i.e., not through an affiliate) was inaccessible to consumers.
13

14 128. Some of Plaintiffs and other SBH affiliates are engaged in full-time network
15 marketing, while others use their SBH affiliation to earn part-time and/or supplemental income.
16 All of Plaintiffs and other SBH affiliates, however, derive income from their SBH affiliation,
17 which has been directly harmed by the FTC's and receiver's actions in this case.
18

19 129. The FTC's actions in bringing this action and seeking and obtaining restraints on
20 SBH's operations has effectively shut SBH down, depriving Plaintiffs and their fellow affiliates
21 of the opportunity to continue taking and benefiting from SBH classes and invaluable education.
22

23 130. In addition, the FTC's actions in bringing this action and seeking and obtaining
24 restraints on SBH's operations has caused direct financial harm to Plaintiffs and other affiliates,
25 including, *inter alia*, lost investments in inventory and training for which Plaintiffs and other
26 affiliates paid but have not received because of the FTC, and earned but unpaid commissions.
27

28 131. The FTC's actions in bringing this action and seeking and obtaining restraints on
SBH's operations infringe upon Plaintiffs' rights, including, *inter alia*, their right to free

1 association under the First Amendment of the United States Constitution, and their right to
2 contract.

3
4 132. As a result of the FTC's actions, Plaintiffs and thousands of other SBH affiliates
5 are being and will continue to be deprived of the benefits of their relationship and association
6 with SBH.

7
8 **Class Allegations**

9 133. This action is brought as a putative class actions pursuant to Rule 23 of the Federal
10 Rules of Civil Procedure.

11 134. Upon information and belief, thousands of SBH affiliates have been, are being,
12 and will be harmed by the FTC's actions against SBH by having their rights and privileges of
13 affiliation with SBH interfered with, if not outright blocked, by the FTC.

14
15 135. Over 1,000 SBH affiliates have signed a petition in support of SBH and against
16 the FTC's overreach against SBH.

17 136. The proposed class in this action is composed of those hundreds, and could extend
18 to thousands, of SBH affiliates whose rights are being impinged by the FTC. Attached hereto as
19 Exhibit A is a list of nearly 1,000 SBH affiliates (inclusive of the named Plaintiffs above) who
20 seek to intervene in this lawsuit and to have party status in order to protect their contracts and
21 rights as SBH affiliates.
22

23 137. The proposed class is so numerous that joinder of each individual SBH affiliate to
24 this action would be impracticable.

25
26 138. The questions of law and/or fact brought before the Court in this action are
27 common to Plaintiffs and all members of the proposed class, and Plaintiffs' claims are typical
28 of the claims of the class.

1 139. Specifically, Plaintiffs seek from the Court a declaration that SBH's affiliates are
2 entitled to continue receiving the benefits of their contracts and relations with SBH free from
3 interference by the FTC.
4

5 140. Plaintiffs' and the proposed class's claims involve the common question of law
6 and/or fact as to whether all parties' respective contracts and agreements with SBH are valid and
7 enforceable, and that Plaintiffs and the proposed class are therefore entitled to receive their
8 benefits, including continued access to SBH products for both personal consumption and
9 inventory for sale, discounts on products whether for personal use or sale, and ongoing sales
10 training.
11

12 141. Plaintiffs will adequately protect and represent the interests of all members of the
13 proposed class, and will vigorously pursue a judgment for the benefit of all members of the
14 proposed class.
15

16 142. The FTC has acted in a manner that applies generally to the entire proposed class,
17 such that appropriate injunctive and/or declaratory relief is necessary regarding the class as a
18 whole.
19

20 143. Specifically, the FTC's actions against SBH threaten all SBH affiliates (i.e.,
21 Plaintiffs and all other members of the proposed class) equally and in the same manner, in that
22 the FTC is attempting to interfere with or block all SBH affiliates from receiving the contractual
23 rights and benefits to which they are entitled as affiliates of SBH.
24

25 144. Additionally and/or in the alternative, the questions of law or fact common to class
26 members predominate over any questions affecting only individual members, and a class action
27 is superior to other available methods for fairly and efficiently adjudicating the instant
28 controversy.

Count I – Declaratory Judgment and Related Injunctive Relief

1
2 145. Plaintiffs hereby incorporate the foregoing allegations of this Complaint as if set
3 forth fully herein.
4

5 146. Section 702 of Title 5, United States Code, provides, in relevant part: “A person
6 suffering legal wrong because of agency action, or adversely affected or aggrieved by agency
7 action ... is entitled to judicial review thereof. An action in a court of the United States seeking
8 relief other than money damages and stating a claim that an agency or an officer or employee
9 thereof acted or failed to act in an official capacity or under color of legal authority shall not be
10 dismissed nor relief therein be denied on the ground that it is against the United States or that
11 the United States is an indispensable party. The United States may be named as a defendant in
12 any such action, and a judgment or decree may be entered against the United States”
13
14

15 147. The Declaratory Judgment Act provides, in relevant part: “In a case of actual
16 controversy within its jurisdiction ... any court of the United States, upon the filing of an
17 appropriate pleading, may declare the rights and other legal relations of any interested party
18 seeking such declaration, whether or not further relief is or could be sought.” 28 U.S.C. §
19 2201(a).
20

21 148. By bringing this action and interfering with SBH’s operations, the FTC, acting
22 under color of its governmental authority, has deprived Plaintiffs, and all of SBH’s other
23 affiliates, of the benefits to which they are entitled by virtue of their contracts and relationships
24 with SBH.
25

26 149. The FTC’s acts have violated Plaintiffs’ Constitutional and other rights, including
27 their right to associate and/or assemble (with SBH, its leadership and personnel, and their fellow
28 affiliates) and their right to contract and to receive the benefits of their contracts with SBH.

1 150. In essence, the FTC in this action seeks to invalidate Plaintiffs’ and other SBH
2 affiliates’ contracts with SBH, depriving them of their benefits without either due process or
3 compensation.
4

5 151. Plaintiffs herein seek a declaration of their rights as to their contractual relations
6 with SBH—specifically, that their contracts are valid, binding, and enforceable, and that
7 Intervenor-Plaintiffs are entitled to receive the benefits thereof.
8

9 152. In furtherance of the relief sought herein, Plaintiffs ask the Court to enjoin the
10 FTC from taking any act which would interfere with or deprive Plaintiffs of the benefits of their
11 contracts and relations with SBH and/or otherwise infringe upon Plaintiffs’ Constitutional and
12 other rights.
13

14 WHEREFORE, Jo Dee Baer, Robert Mehler, Dr. Jeffrey Wright, Dr. Carol Magda, Dr.
15 James Marinakis, Dr. John Davis, Tevis Sherfield, Brooke Sherfield, Tyler Sherfield, Carleigh
16 Sherfield, Melanie Summers, Richard Summers, Jill Boone, April Brown, Scott Cunningham,
17 Reverend James Irving, Rhonda Wright, Buddy Wright, Mike King, Jeff Brown, Raquel
18 Crawford, James McKee, Clayton Miller, Robert Baird, Ronnie McHaffie, Jerry Ayers, Joseph
19 Farley, Kara Kennedy, Sherry Harrod, Dwayne Hosey, Britney Pineau, Debby Armentrout, and
20 Linda Huff, on behalf of themselves and others similarly situated, for themselves and others
21 similarly situated, respectfully request that this Honorable Court enter judgment in their favor
22 and against Defendant Federal Trade Commission: (1) declaring that Plaintiffs’ contracts with
23 SBH are valid, binding, and enforceable; (2) enjoining the Federal Trade Commission from
24 taking any acts which would infringe upon Plaintiffs’ rights, including, *inter alia*, their rights to
25 receive the benefits of their contracts with SBH; and (3) awarding such other relief as the Court
26 deems just and proper.
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Respectfully submitted,

/s/ Maurice R. Mitts
Maurice R. Mitts, Esquire (*Pro Hac Vice*)
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EXHIBIT A
INTERVENORS – SUCCESS BY HEALTH AFFILIATES

Joyce	Adams
Robin	Adams
Chelsea	Adkins
Christine Therese	Agren
Star	Aiello
Jacqueline	Alavarez
Susanne	Aldrin
Benjamin	Ali
Maram	Almadi
Johnny	Alston
Abdul Lateef	Ameen
Blaire	Anderson
Chad	Anderson
Heather	Anderson
Michael	Anderson
Nicholas	Anderson
Ryan	Anderson
Julia Sofia	Andersson
Miriam	Andeyo
Paola Lorenzo	Andrade
Galina	Andrianova
Mustafa	Andrianova
Tanisha	Angulo
Michelle Lea	Arbuckle
John	Archuleta
Kimberly	Archuleta
Joshua	Armenterout
Claire	Armentrout
Debby	Armentrout
Judson	Armentrout
Alivia	Armstrong
Laurel Johanna	Atcher
Robert	Atchley Jr
Tamela	Atkinson
Lori	Aube
Garrick Nicholas	Aubrey
Mathilda Agnes Christine	Augustsson
Sandra	Austin

Charldine Kay	Ayers
Jerry	Ayers
Dr. Robert Henwood	Baer
Jo Dee	Baer
Nancy	Baird
Rob	Baird
Becky	Baker
Deborah Jane	Ball
Kelsey	Balmer
Hector Ricardo Amaya	Barbosa
Aldin	Barlov
Charles Douglas	Barnes
Theresa	Barnhart
Christopher	Bartolone
Heather	Bassett
Katelin	Bassett
Isaac	Beachy
Christi	Beam
Robert	Beam
Solangel Lopera	Bedoya
Janice Lynn	Belcher
Jordan	Bell
Kenneth	Bell
Mariah Pae	Bennett
Patricia Pae	Bennett
Terrell Wayne	Bennett
Astrid	Berititech
Joie Lane	Bier
Lauren	Bier
Ashley	Bigley
Ashley Rhiannon	Bigley
Ruth	Billings
Gregory	Bingham
Jessie	Blacklock
Zach	Blacklock
Tammy Leigh	Blake
Stephen Marlein	Blalock
Mark Thomas	Blanton
Christopher	Bliss
Robert	Boisvert

Debra	Bokash
Dolly	Bolden
Brian Robert	Bolton
Melanie Lee	Boltze
Birgit	Bonin
Agnes	Bonne
Alfred	Boone
Connie	Boone
David	Boone
Jill	Boone
Anthony	Boston
Linda	Boston
Maurice Allen	Boston
Tony	Boston
Ting	Bouffard
Michael	Bourdeau
Harold	Bowen
Laura	Bowen
Lauriel Angelique	Bowen
Richard	Boyd
Vanessa	Boyer
Melinda Lou	Boyers
Barry	Braxton
Carl Eliga	Bray
Allison	Breiter
Christopher	Brock
Steve	Brock
Jim	Bronson
Mary Lou	Bronson
Kayla	Broughton
Kayla	Broughton
April	Brown
Barny	Brown
Barry	Brown
Carissa	Brown
Christian	Brown
Faith	Brown
Jeffrey	Brown
Judith April	Brown
Quinn	Brown
Tameshia	Brown

Laura	Broyles
Donna	Bruce
Geary	Bruce
Danielle Esther	Brunelli
Louis Phillip	Brunelli
Jason	Bruner
Joanie	Buchanan
Abigail	Bucher
Molly	Bucher
Angela Maria	Buitrago Munera
Heather	Bullman
Connie	Bunyard
Jacob	Bunyard
John	Bunyard
Joshua	Bunyard
Victoria	Burger
Cathy Joyce	Burnett
Marsha Mays	Burton
Joshua Ryan	Bushu
Marty	Buss
Karen	Butler
Juan Carlos	Cabrera
Dr. Omar J.	Campbell
Sonia	Campbell
Jaqueline Nathalie Linnea	Carlsson
Emil	Carlsson
Ingo	Carlsson
Liselott	Carlsson
Therese	Carlsson
Mike	Carr
Lisa Renee	Carrillo
Daniel	Carroll
Joseph	Carroll
Meredith	Carroll
Susan	Carson
William	Carson
Erica Leann	Carter
Pamela Denise	Carter
William Linden	Carter
Christina	Cassels

Kelley Marie	Cepero
Leandro	Cepero
Liana	Chahin
Michael	Chapman
Claudia	Chica
Rebecca Lynn	Chick
Amanda	Childers
Jeff	Christenson
Susan	Ciszek
Tony	Clark
Kelley	Coakley
Angela	Coen
Angela	Cohen
Andrew	Coil
Aspen	Coil
Carol Ann	Coleman Boone
Jerome	Coles
Aldrin	Colinayo
Liza	Colinayo
Heather Marie	Collins
Theresa Annette	Colton-Dialls
Morgan	Connolly
Mara Su	Conyurse
Bradley Dale	Cornelison
Tracy	Cornell
John	Costigan
Ross Allen	Cox
Raquel	Crawford
Rosemary	Crawford
Tirzah	Crawford
Michael Lee	Crawford Gilbert
Debra	Crockett
Soraya	Crowell
Alex	Cummings
Hailey Isabelle	Cunningham
John Lee	Cunningham
Michelle Ardi	Cunningham
Scott	Cunningham
Scott Duane	Cunningham
Sharon Sue	Cunningham
Justin Anthony	Currie

Hugh	Daiger
Karen	Daiger
Constance	Dakan
Keith	Daly
Karyl	Darigan
Kyle	Darigan
Brent David	Davis
Emily	Davis
Hugh	Davis
Jerry Michael	Davis
John	Davis
Julia Ann	Davis
Lisa	Davis
Michael	Davis
Paula	Davis
Valerie	Davis
Valrie	Davis
Burt	Davisson
Dee Dee	Dawn
Donna	Dawson
Kristi	Del Valle
Mark	DeloSantos
Jeffrey	Derby
Rikki	Derby
John Sharp	Devine
Mariola	DiFranzio
Arthur	Dobson
Nora	Dolan
Heath	Dolen
Brooks	Dollar
Liezel	Dompor
Theresa Michelle	Donerson
Mauro Francisco	Donoso
Zachary	Doolan
Lavasha Renee	Duff
Renee	Duff
Clarice	Duke
Cynthia Gay	Duncan
James Nelson	Duncan
David Jesse	Duran
Tasha	Dwalram

Stephen	Dwyer
Judith	Eddins
Danie	Edwards
Michelle Lynn	Edwards
Michelle McKenzie	Edwards
Kenneth	Edwards II
Yahaira	Eezqua
Margaret	Eiser
Amanda Olivia	Elzer
Filippa Berta	Elzer
Jesper Emmanuel	Elzer
Mikael André	Elzer
Catherine	Erdman
Blanca	Esneda
Elda	Espinoza
Maria Dolly	Esquivel
David	Esquivia
Caroline	Estrada
Beverly Ann	Eustice
Kingsley	Evans
Janice Elaine	Farley
Joe	Farley
Gwen	Farris
Klella Jo	Farris
Will	Fedo
Teresa Ann	Felt
Kristina	Ferency
Lynn	Ferguson
Klella	Ferris
Dawna Wentzel	Fiest
Carrie	Fisher
Lashawna Catrice	Fleming
Gerald	Fletcher
Tamera	Fletcher
Ruth	Fluharty
Kera Asberry	Ford
Angel	Forster-Knight
Bruce David	Fowler
Judith Ann	Fowler
Omelia	Franklin

Carla	Freeman
Carla Renee	Freeman
Geneva	Frieszell
Aaron	Frye
Angela	Fugate
Ashley Lynn	Fuller
William Curtis	Fullerton
Richard	Gallena
Cynthia	Gandara
Susan Elizabeth	Gardieff
Brittany	Garrett
Brittany	Garrett
Joey	Garrett
Joseph	Garvey
Shawn David	Garvey
Holly	Gatewood
Pricilla Lee	Gaul
Vianna	Gibson
Carlos	Gil
Johanna Andrea	Gil
Mike	Gilbert
Deborah	Gilbert-White
Adam Perry	Gilliam
Rebecca Gail	Gilliam
Tiffany	Gilliam
Jodi	Gillman
Cynthia	Glasscock
James	Glasscock
Joseph Alan	Gleason
Connie	Godfrey
Shannon Rachelle	Godfrey
Aisha	Gold
Jose	Gomez
Patricia Ivette	Gomez
Jennifer	Gonzalaz
Ryan	Goodpastor
James	Gordon
Julian	Gordon
Julie	Gordon
Ahren Marsch	Graham
Rocio Tabares	Grajales

Robert	Grant
Kevin	Greene
Michelle	Greene
Ronald	Greene
Victoria	Greene
Carolyn	Greentree
Adriana	Guevara
Bobby	Guevara
Clarinda	Guevara
Melida	Guevara
Jonathan Isaiah	Guffey
Ronald	Hairston
Miranda Laine	Haley
Nason William	Haley
Nicholas Trey	Haley
Bonnie	Halfhill
Keven	Hall
Jacob	Hamilton
Stephenn	Hamon
Ann-Marie	Handen
June Patricia	Hans
Melina Eila	Hansson
Janet	Harriman
Stacey	Harrington
Aubree Janelle	Harris
Carolina	Harris
Chiara Louann	Harris
George	Harris
Jeffrey Stewart	Harris
Kenneth Fred	Harris
Mariah	Harris
Renieca	Harris
Cesar	Harris-Villegas
Cesar	Harris-Villejas
Fabian	Harris-Villejas
Sherry	Harrod
Shirley	Harvil
Maleta Diane	Hasler
Robert	Haynes
Trina	Haynes
Suzanne	Heal

Nancy	Heard
Shannon	Hearld
Angela	Hellard
Kathleen	Heller
Wayne	Heller
Sharon Roxann	Helms
Bill	Henderson
Virginia Dupree	Henderson
William Chester	Henderson
Aycardo Sepulveda	Heredia
James Stewart	Herman
Nycole	Hernandez
Lorena Almeida	Herrera
Martha Alicia	Herrera
Edward	Herrick
Francois	Hewing
Jalalamar Francois	Hewing
Megan	Hewing
Michael	Highley
Elizabeth Joel	Hilton
JoBeth	Hilton
Marlene	Hilty
Steven	Hilty
Andrew	Hinchliffe
Jack Scott	Hinchliffe
Janet Selbee	Hinchliffe
Donnis	Hiskett
William	Hodge
Carrie	Hoffeditz
Barbara	Holder
Randall	Holder
Joseph	Hollenback
Caron	Holton
Bailey Sofia	Hosey
Dwayne	Hosey
Suhair Mahasin	Hoskie
Jason	Hubbard
Linda	Huff
Kristyn	Hulett
Karen	Hunt
Sara Lee	Huntley

Glenn	Hyatt
Karen	Hyatt
Ami	Irving
Rev. James	Irving
James Conover	Irving Jr
Franya Kathleen	Isley
William	Isley
Ronja Mikaela	Ivarsson
Dominique	Jackson
Kimberly	Jackson
Lauryn	Jackson
Judith	Jacquez
Maria Acosta	Jacquez
Michelle	Jacubiak
Jorg John Peter	Jaegers
Adrian	Jefferies
Teiann	Jenkins
Rusty Allen	Jernigan
Doris	Johansson
Brittany Bilbrey	Johnson
Bunny	Johnson
Helen	Johnson
James Andrew	Johnson
Rodney	Johnson
William Thomas	Johnson
Edwin	Joiner
Stacey Kamal	Joiner
Joseph	Jones
Lucille	Jones
Lucy Ann	Jones
Shannon Rachelle	Jones
Nancy	Jordan
Tera	Jowske
James	Juarez
Amina Makhdumi	Kamal
Fred	Kamanya
Ingrid	Karlsson
Jacqueline	Karlsson
Christopher	Kastner
Cynthia Jade	Kastner

David	Keeser
Marilyn	Keeser
Brooke	Kemp
Kara	Kennedy
Spencer	Kenton
Ulrike	Kersting
Sorphea	Khat
Connie	Killoran
Gary	Kimmel
Paulina Margareta Helena	Kindahl
Brian	King
Danny Leonard	King
Eric	King
Michael	King
Mike	King
Carrie	Kingston
Catherine	Klug
Jessie	Knearem
David	Knighton
Jean	Koncos
Gerald	Koski Jr
Homer	Krehbiel
Jeff Alan	Krehbiel
Ashley	Lahey
Karla Carol	LaHue
Mariam	Lamison
Alice	Larsdotter
LaDarrius	LaShore
Foster Evan	Laster
Sherri	Laster
Sherri Estelle	Laster
Paul Andrew	Laurents
Teresa Ann	Lee
Junior	Leon
Maria Elena Joven	Leon
LaDarrius	LeShore
Heather	Lewis
Samantha	Lewis
Robert	Liebhauser
Sheryl	Liebhauser

Anibal	Lima
Renée Annette	Lind
Benny Lars-Peter	Lindroth
Christopher	Lindstrom
Roland	Lindvall
Julia	Lindwall
Stefan	Linstrom
Felix	Lisboa
Jody	Litton
Sandra	Lopez
Tatiana Castillo	Lopez
Andrea	Lore
Matthew	Lore
Rachel	Lovely
Andrea	Loy
Paula (Christy)	Loy
Thomas	Loy
Maria Isabel	Lozada Caicedo
Patricia	Lozada Caicedo
Carol	Maciel
Mark	MacVittie
Janette	Madlock Dent
Asil	Mael
Helena	Mael
Kristina	Mael
Mark	Mael
Mark Asif	Mael
Dr. Carol	Magda
Lawerence	Maimone
Sara	Makach
Jehina	Malik
Angela	Mangham
Luz Stella Londono	Marin
Alyse	Marinakis
Christopher Lee	Marinakis
Dr. Jim	Marinakis
Rhonda	Marinakis
Varsilly	Marinin
Ulysses	Marnakis
Mary Ellen	Marshall
Frank	Martiere

Jennifer	Martinez
Jesse	Martinez
Karen	Martinez
Marc	Martinez
Millie	Martinez
David Floyd	Mason
Irma	Mata
Karla	Mattox
Selena	Mattox
Marsha Lynn	Mayes-Burton
Karla Rae Dragoo	Mays
Gregory Shane	Mcafee
Elaine	McCaffrey
Emma	McDuffie
James	McDuffie
Maureen Elens	McGrath
Margie	McGregor
Ronnie	McHaffie
Mahasin	McIntosh
James Robert	McKee
Boo W	McKey
Melissa Brianna	McKey
Tori	McKinley
Crystal	McKinney
John	Mead
Sonia	Medina
Jarred	Medlin
Robert	Mehler
Sarah	Meinzer-Dollar
Deborah	Mello
Jerry Dean	Mellon Jr
Paul	Mendez
Adam	Mendoza
Carlos Alberto	Mendoza
Symantha	Mendoza
Darla	Mercer
Amy	Merseal
Amy	Merseal
Dawn	Merseal
Crystal Nicole	Mesick
William Edward	Meyers Jr

Charles	Middleton
Loretta	Middleton
Amanda	Miller
Carrie	Miller
Clarence	Miller
Clayton	Miller
Clayton Dale	Miller
Donald	Miller
E. Dale	Miller
Ferd	Miller
Holly	Miller
Ivan	Miller
John	Miller
Linda	Miller
Mary	Miller
Wilma	Miller
Dr. Donald	Miller
Marsha	Mills
Morris	Mills
Peter	Mingils
Alecia	Miniaci
William	Minzenmayer
Nicholas	Miranda
Elinami Suzana	Mkanta
Marcella Damigos	Molnar
Paul Howard	Molnar
Brian	Monroe
Suzy	Monroe
Luz Elena Torres	Monsalve
Shannon	Moore
Lori	Morel
Augusto	Moreno
Angel Arturo	Moreno
David	Morgan
Amairani	Moros
Dylan Robert	Morris
Paola Vidal	Mosquera
Yineth Vidal	Mosquera
Christina	Mugford
Khalidah	Muhammad
Paul	Muhammad

Annastacia	Muli
Dalmon	Murphy
David Leon	Musgraves
Dena	Musgraves
Dr. Lisa Renee	Myers
Cheri	Myron
Rose-Mari	Najmaldin
Mike	Napier
Barry Brandon	Nash
Danny Gene	Nash
Kenneth	Nash
Kimberly Ann	Nash
Lloyd Martin Butch	Nash
Rita Ann	Nash
Roger Dale	Nash
Ronda Darlene	Nash
Ronda Marlene	Nash
Tony Lee	Nash
Walter Dean	Nash
Samantha	Nazario
Nicole	Nestle
Laurene	Niimi
Ereleta	Nikqi
Qendresa	Nikqi
Sanna Katrina	Noppa
Melissa Ann	Nowery
Abdel	Nuriddin
Wilson Villegas	Obando
Travis	O'Gorman
Kaitlyn Sheree	Oliver
Julie	O'Neill
Mikaela Signe Josefin	Orrben
Leslie	Osmera
Sena	Ozdenkos
Bridgett	Parchment
Elvira	Parker

Viviane	Parker
Marciano Jacquez	Parra
Ashlea	Parsons
Lisa Diane	Patterson
Monica	Patterson
Ron	Pawloski
Yevonne Carraway	Pawloski
Carrie	Payne
Ginger	Perez
JP	Perez
Curtis	Perry
Genoveva	Person
Caroline	Petersson
Rebecca	Peyyala
Ashley	Phillips
Katie	Phillips
Laura Waller	Picard
Richard	Picard
Tammy	Pickens
James	Pierce
Kristin	Pierce
Pamala	Pierce
Joseph	PierceT
Dale	Pierro
Andrea	Pilenghy Silva
Britney	Pineau
Justin	Pines
Grace	Pittelli
Patricia	Pittman
Patricia	Piveral
Javier Ferreira	Plata
Brendan Michael	Porter
Samantha Renae	Porter
Arthur	Powell
Jessie	Powell
Victoria	Price-Cummings
Diana	Pupp
Sonya Johnson	Pusey
Steven Wesley	Putnam
Thea Olivia	Qvist
Brenda	Rager

Kimberley	Raimist
Balvinder	Rajbans
Laura	Ramirez
Veronica	Ramirez
Ulla Carina Edsköld	Ramstedt
Fred	Rater
Sharon	Ray
Nico	Razo
Mark	Reese
Jack	Reese Jr
Yusuf	Registe
Hud	Reiersgaard
Stacey	Reiersgaard
Ann	Renaud
Charles	Renaud
Stephan	Renaud
Sheryl Marlene	Renfrow
Terra Ann	Revell
Laura	Reynolds
Marvin	Reynolds
Mary Emma	Reynolds
Ann	Reza
Robert	Reza
Marilyn Sue	Rhodes
Monica	Riggs
Chaison	Ritchie
Lizabeth	Rizzo
Paul	Roach
Scott	Roberts
Wendell	Robertson
Shana	Robinson
Trevor	Robinson
Betty	Rodriguez
Carla	Rodriguez
Diana	Rodriguez
Martha Lucy	Rodriguez
Julie	Rohret
Joseph	Romano
Melanie	Romano

Brenda	Romisch
Dorothy	Ropp
Fabian	Rosas
Brian	Ross
Frederick	Ruiz
Amaan	Rushdu
Tamela	Rustemeyer
Worden	Rustemeyer
Aidan	Rutherford
Faith Ann	Rutherford
Richard	Rutherford
Sarah	Sabolik
Chase	Sacca
Aurilea	Sage
Pernilla Susanne	Sahlin
Marco Antonio	Salazar
Efrain Polanco	Sanchez
Marianita	Sanchez
Natalia	Santiago
Shane Robert	Saunders
Hudson	Saurel
Jack Scott	Savage
Kerri	Scarry
Eldon	Schmidt
Mervin	Schrag
Martha	Schrock
Ricky Neal	Scott Jr
Bradley Don	Selvey
Lisa	Senske
Cole	Shaddock
Dale	Shaddock
Erika	Shaddock
Lori	Shaddock
Wade	Shaddock
Dwyane	Shaw
Shirl	Shelley
Brooke	Sherfield
Carleigh	Sherfield
Tevis	Sherfield
Tyler	Sherfield
Mary Alice	Shinn

Cody Lee	Shoemake
Sandra Renee	Shoemake
Christy Ann	Shomake
Vicki Joyce	Shomake
Tarvis	Sibley
Gloria	Sims
Harold	Sims
Sharon	Sims
Samantha	Singh
Conny	Sjogren
Maria	Sjogren
Theresa	Sjogren
Mark	Skokan
Jessica Marie	Slate
Christopher	Small
David	Small
Jessica	Small
T. Diane Bellamy	Small
Dennis	Smith
Diana Lynn	Smith
Douglas Everett	Smith
Katrina	Smith
Kelli	Smith
Michael	Smith
Shirley	Smith
SueLynn	Smith
Dudley	Snyder
Valery Johanna	Solarte
Carlos	Solla
Dana	Solomon
Arley Trujillo	Sotto
Melanie Hope	Spahr
Doug	Spiegel
Jerry Carl	Spradlin
Joseph	Spychalski
Berta Filippa	Staaf
Donna	Stacey
Maria	Stade
Payten	Standerfer
Stacie	Starkey

Fred	Stephens
Janet	Stephens
Brian	Stevens
Grace	Stevens
Julia Helen	Stevens
Edward	Stewart
Rebecca	Stewart
Joseph Chester	Stewart III
Don	Stickney
Donald Lowel	Stickny Jr.
Carol	Stiles
Corey	Stiles
Kristen	Stiles
Spencer	Stiles
Mary Ann	Stokes
John	Stovall
Melanie	Summers
Rebecca	Summers
Rick	Summers
Scott	Summers
Glenda Leshea	Summons
Becky	Sutton
Niklas	Svantesson
Robert Jan Dennis	Svedin
Kristie Michele	Sweetsir
Scott	Sweetsir
Michael	Sweitzer
Terisha	Tatter
Donna Gail	Thomas
Missy	Throckmorton
Christopher	Tilton
Genevieve	Tilton
Linda	Tocco
Michelle	Tocco
James	Todd
Nancy	Todd
Stephen	Tollman
Francisco	Torres
Vanessa	Torres
William	Torres
Charlene	Towns

Paula	Towns
Stephanie	Tropicchio
Kent	Trobaugh
Erica	Trtan
Daniel	Tshilombo
Gary Lee	Tuck
Heather Marie	Tuck
Sherrie Lynn	Tuck
Kaylin	Tucker
Donald	Underhill
Madonna	Underwood
Sandra Viviana	Upegui
Evangelene	Utter
Valorie	Van Orden
Dr. Michel	Van Thielen
Liezel	Vandenbussche
Philippe	Vandenbussche
Yolanda	Vargas
Cynthia	Vary
Robert Michael	Vaughn
Jose Antonio	Vazquez
John	Venable
Tina	Venable
William Charles	Vickers, Jr.
Christopher Michael	Vignery
Matthew	Villalbos
Julie	Villalobos
Matthew	Villalobos
Lucio	Villasenor
Inge	Volgelmann
Amy Lee	Vrazel
Edward Frank	Vrazel
Zachery Paul	Vrazel
Miriam	Vuyanzi
Cortnie	Waddell
Patte	Waddell
Patsy Ann	Waldron
Kelly	Waldrop
Mary Christine	Walker
Sonya	Walter

Chandra Kay	Ware
LaShun	Way
Daniel Little Hawk	Webster
Bette Jane	Weeks
Skylar Desmond	Weeks
Verna Loraine	Weese
Nikki	Wehmeyer
Amber	Wehrle
Justin	Wehrle
Beth	Welker
Matthew Sean	Wells
Matthew Sean	Wells
Diana Sue	West
Caroine Geralynn	Weter
Caroline	Weter
Deborah	White
Svetlana	White
Svetlana	White
Angela	Wicker
Angela	Wicker
Hugo Bernard Olof	Wikstrom
Stanley	Wiley
Teresa Lea	Wiley
Thomas	Wilkerson
Penny Lou	Willett
Dionne	Williams
DeLee	Williams-Small
LaCreese	Willingham
Anika Rose	Wilson
James	Wilson
Kimberly	Wilson
Myles	Wilson
Philip	Wilson
Sara Alma Charlotta	Winbro
Justin	Womble
Alexis Genieve	Wright
Amber Lee	Wright
Buddy Ray	Wright
Jeffrey Val	Wright
Penny Campbell	Wright

Rhonda	Wright
Sada Nicole	Wright
Heidi	Wynne
Lord	Xodus
Hassan	Yamini
Stuart	Yoder
Richard John	Youngs
Scott Alan	Zardenetta
Victor	Zehr
Adriana Moreno	Zuluaga