

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Case No.: 3:22-cv-487-TJC-MCR

MICHAEL RANDO, et al.

Defendants.

---

**UNOPPOSED MOTION TO WITHDRAW**

Under Local Rule 2.02(c), Jared J. Burns and Daniel K. Bean move to withdraw as counsel of record for Defendants Elite Customer Services, LLC (“ECS”) and Resource Management Investments, LLC (“RMI”).

On May 19, 2022, Jared Burns and Daniel Bean appeared as counsel for Defendants ECS and RMI. (Docs. 25, 26). On January 20, 2023, the Court entered a Stipulated Order for Permanent Injunction and Monetary Judgment as to Defendants Elite Customer Services, LLC, and Resource Management Investments, LLC. (Doc. 117). The Permanent Injunction appointed an equity Receiver to “exercise full control over” ECS and RMI. (Doc. 117 at 14).

As the Receiver is now in control of ECS and RMI, Jared Burns and Daniel Bean seek to withdraw as counsel for ECS and RMI. The Receiver is represented by Kacy Donlon.

**LOCAL RULE 2.02(c)(1)(B)(i) CERTIFICATION**

Under Local Rule 2.02(c)(1)(B)(i), the Receiver, on behalf of Elite Customer Services, LLC and Resource Management Investments, LLC, consents to the withdrawal.

**LOCAL RULE 3.01(g) CERTIFICATION**

Under Local Rule 3.01(g), the undersigned conferred with counsel for the Federal Trade Commission, and the FTC does not oppose the relief sought herein.

DATED: May 18, 2023.

**ABL LAW, P.A.**

/s/ Jared J. Burns  
Daniel K. Bean, Esq.  
Florida Bar No. 15539  
Email: *dbean@abelbeanlaw.com*  
Jared J. Burns, Esq.  
Florida Bar No. 1003415  
Email: *jburns@abelbeanlaw.com*  
100 N. Laura Street, Ste. 501  
Jacksonville, FL 32202  
Phone : 904-944-4100

***Counsel for Defendants,  
Elite Customer Services, LLC  
And Resource Management  
Investments, LLC***

**CERTIFICATE OF SERVICE**

I certify that on May 18, 2022, I electronically filed the foregoing with the United States District Court for the Middle District of Florida by using the CM/ECF system which will send notification of such filing to all counsel for record.

*/s/ Jared J. Burns* \_\_\_\_\_