

1 WILLIAM E. KOVACIC
General Counsel

2 RAYMOND E. MCKOWN (CA BAR #150975)
3 BARBARA Y. K. CHUN (CA BAR #186907)
Federal Trade Commission

Priority
Send

2/12/71

[REDACTED]

1 the Court to resolve all matters raised by the Commission's
2 November 29, 2001 complaint, without admission of liability, and

[REDACTED]

[REDACTED]

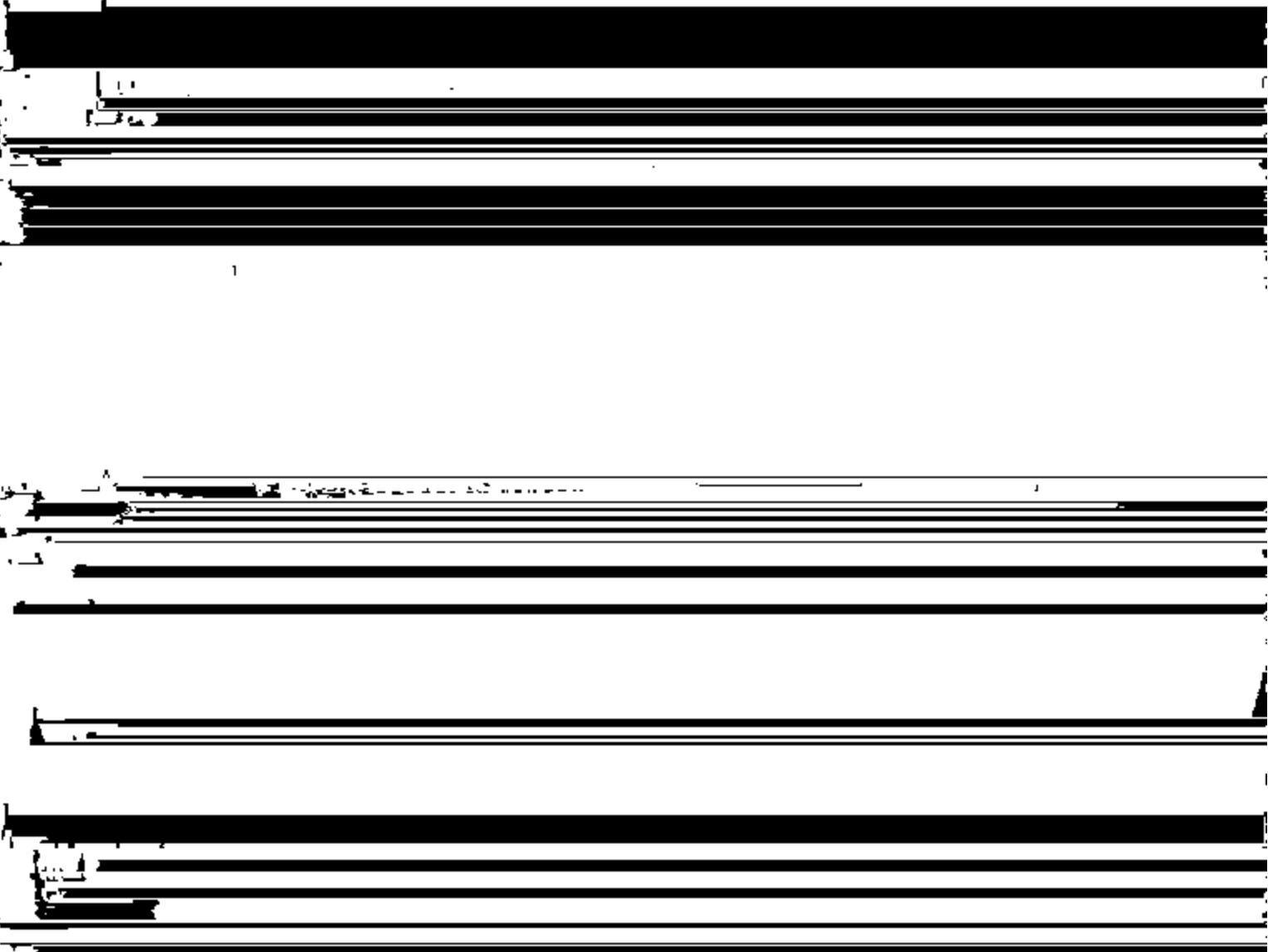
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1 to, or claim to, any real and personal property, including but
2 not limited to chattel, goods, instruments, equipment, fixtures,
3 general intangibles, effects, leaseholds, mail or other
4 deliveries, inventory, checks, notes, accounts, available credit,
5 through credit card accounts or otherwise, receivables (as those
6 terms are defined in the Uniform Commercial Code), cash, funds,
7 property, artwork, coins, precious metals, jewelry, contracts, or
8 shares of stock that are (1) owned or controlled by defendants



1 independent contractors, attorneys, and all other persons or
2 entities in active concert or participation with them who receive
3 actual notice of this Order by personal service or otherwise,
4 whether acting directly or through any sole proprietorship,
5 partnership, limited liability company, corporation, subsidiary,
6 branch, division, or other entity, are permanently restrained and
7 enjoined from: (1) receiving any remuneration of any kind
8 whatsoever from any business entity in which any defendant holds

1 entities such as the three major credit bureaus, or by any other
2 means or method;

3 B. Misrepresenting any fact material to a consumer's
4 decision to purchase any product or service sold by you

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 Salyon, Inc. (executed by Mark Lyon on Nov. 22, 2001; executed by
2 John Lyon on Nov. 15, 2001); Mark Lyon (Nov. 22, 2001); John Lyon
3 (Nov. 15, 2001), and related documents listed in Attachment B

4

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 be used for purposes of collecting and reporting on any
2 delinquent amount arising out of such persons' relationship with
3 the government; and

4 E. Proceedings instituted under this Section are in
5 addition to, and not in lieu of, any other civil or criminal
6 remedies that may be provided by law, including any other
7 proceedings the Commission may initiate to enforce this Order.

8 VI. CUSTOMER LISTS

9 IT IS FURTHER ORDERED that defendants, as well as their
10 successors, assigns, agents, servants, employees, salespersons,
11 independent contractors, attorneys, and all other persons or
12 entities in active concert or participation with them who receive
13 actual notice of this Order by personal service or otherwise,
14 whether acting directly or through any sole proprietorship,
15 partnership, limited liability company, corporation, subsidiary,
16 branch, division, or other entity, are hereby permanently
17 restrained and enjoined from selling, renting, leasing,

1 law, regulation, or court order.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

IX. COMPLIANCE REPORTING BY DEFENDANTS

IT IS FURTHER ORDERED that, in order that compliance with the provisions of this Order may be monitored:

A. For a period of five years from the date of entry of this Order, each individual defendant shall notify the Commission of the following:

1. Name, address, telephone number, and

1 writing;

2 E. For the purposes of this Section, "employment" includes
3 the performance of services as an employee, consultant, or
4 independent contractor; and "employers" include any individual or
5 entity for whom defendants perform services as an employee,
6 consultant, or independent contractor; and

7 F. For purposes of the compliance reporting required by
8 this Section, the Commission is authorized to communicate
9 directly with defendants Salyon, Inc., Mark Joseph Lyon, and John
10 Donald Lyon, or such other person or attorney designated in
11 writing by such defendant.

12 X. DISTRIBUTION OF ORDER BY DEFENDANTS

13 IT IS FURTHER ORDERED that, for a period of five years from
14 the date of entry of this Order, defendants, as well as their
15 successors, assigns, agents, servants, employees, independent

[REDACTED]

1 independent contractors or otherwise, immediately upon employing,
2 retaining, or contracting with any such entity, for any business
3 where defendant is the majority owner of the business or
4 directly, indirectly, or in concert with others controls the

[REDACTED]

[REDACTED]

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[REDACTED]

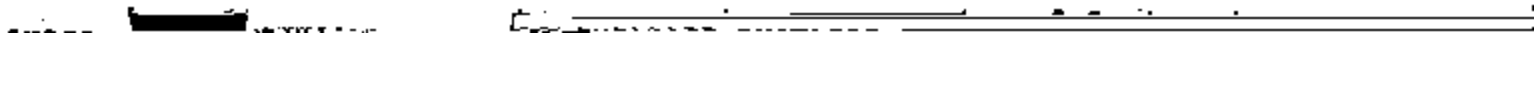







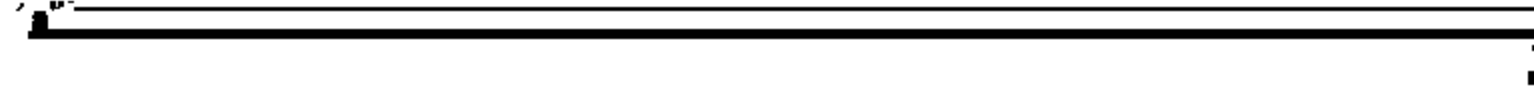
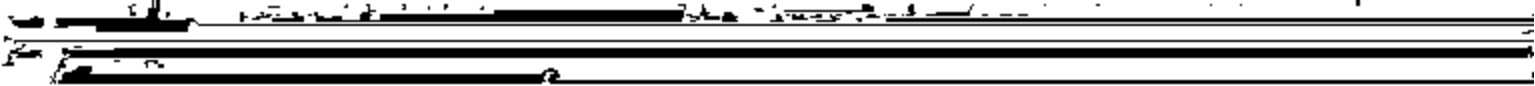
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 complaints or inquiries, and all sales personnel, whether
2 designated as employees, consultants, independent contractors or
3 otherwise, of any business to which Subsection A of this Section
4 applies, concerning matters relating to compliance with the terms
5 of this Order. The person interviewed may have counsel present.



1 address, and telephone number of each person employed
2 in any capacity by such business, including as an
3 independent contractor; that person's job title or
4 position; the date upon which the person commenced
5 work; and the date and reason for the person's
6 termination, if applicable;

7 C. Customer files containing the names, addresses, phone
8 numbers, dollar amounts paid, quantity of items or
9 services purchased, and description of items or
10 services purchased, to the extent such information is
11 obtained in the ordinary course of business;

12 D. Complaint and refund requests (whether received
13 directly, indirectly or through any third party) and
14 any responses to those complaints or requests; and

15 E. Copies of all sales scripts, training materials,
16 advertisements, or other marketing materials

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1 court other than this one any suit, action, or other proceeding
2 directed against the Receiver arising from or related to any acts
3 undertaken or omissions made by the Receiver in the course of

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ATTACHMENT B

1. 1999 Salyon, Inc., dba Quicklinks.com Federal Income Tax Return (15 pages);
2. 1999 California Corporation Franchise or Income Tax Return (14 pages);
3. 1999 Annual Summary and Transmittal of US Information Returns for Salyon, Inc., Quicklinks.com (2 pages);
4. 2000 Salyon Inc. dba Quicklinks.com Federal Income Tax Return (15 pages);
5. 2000 California Corporation Franchise or Income Tax Return (19 pages);
6. 2000 US Individual Income Tax Return for Mark J. Lyon (9 pages);
7. 2000 California Resident Income Tax Return 2000 for Mark J. Lyon (5 pages);
8. Transcript of the deposition taken of Mark J. Lyon on Dec. 11, 2001, by the Federal Trade Commission.

CERTIFICATE OF SERVICE

1

2

My name is Raymond E. McKown. I am an attorney employed by the

[REDACTED]