

ORIGINAL

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF THE DISTRICT OF COLUMBIA

FEDERAL TRADE COMMISSION,
600 Pennsylvania Avenue, NW
Washington, DC 20580

Plaintiff,

v.

ONE OR MORE UNKNOWN PARTIES
DOING BUSINESS AS THE INSTITUTE FOR
INTERNATIONAL LICENSING, ALADDIN
FINANCIAL MANAGEMENT, UNIVERSITY
SYSTEMS, AND WHEELIE INTERNATIONAL
LIMITED,

Defendant(s).

Civil Action No. 03 0021

FILED

JAN - 9 2003

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

[proposed] **EX PARTE** TEMPORARY RESTRAINING ORDER WITH AN ASSET
FREEZE, AN ACCOUNTING, EXPEDITED DISCOVERY, AND OTHER EQUITABLE
RELIEF AND ORDER FOR DEFENDANTS TO SHOW CAUSE WHY PRELIMINARY
INJUNCTION SHOULD NOT BE ENTERED

1. This Court has jurisdiction over the subject matter of this case, there is good cause to believe it will have jurisdiction over all the parties hereto, and venue in this district is proper;

existence and location of assets and documents, and other equitable relief, is in the public interest;

7. No security is required of any agency of the United States for issuance of a restraining order. Fed. R. Civ. P. 65(c); and

8. This temporary restraining order is in the public interest.

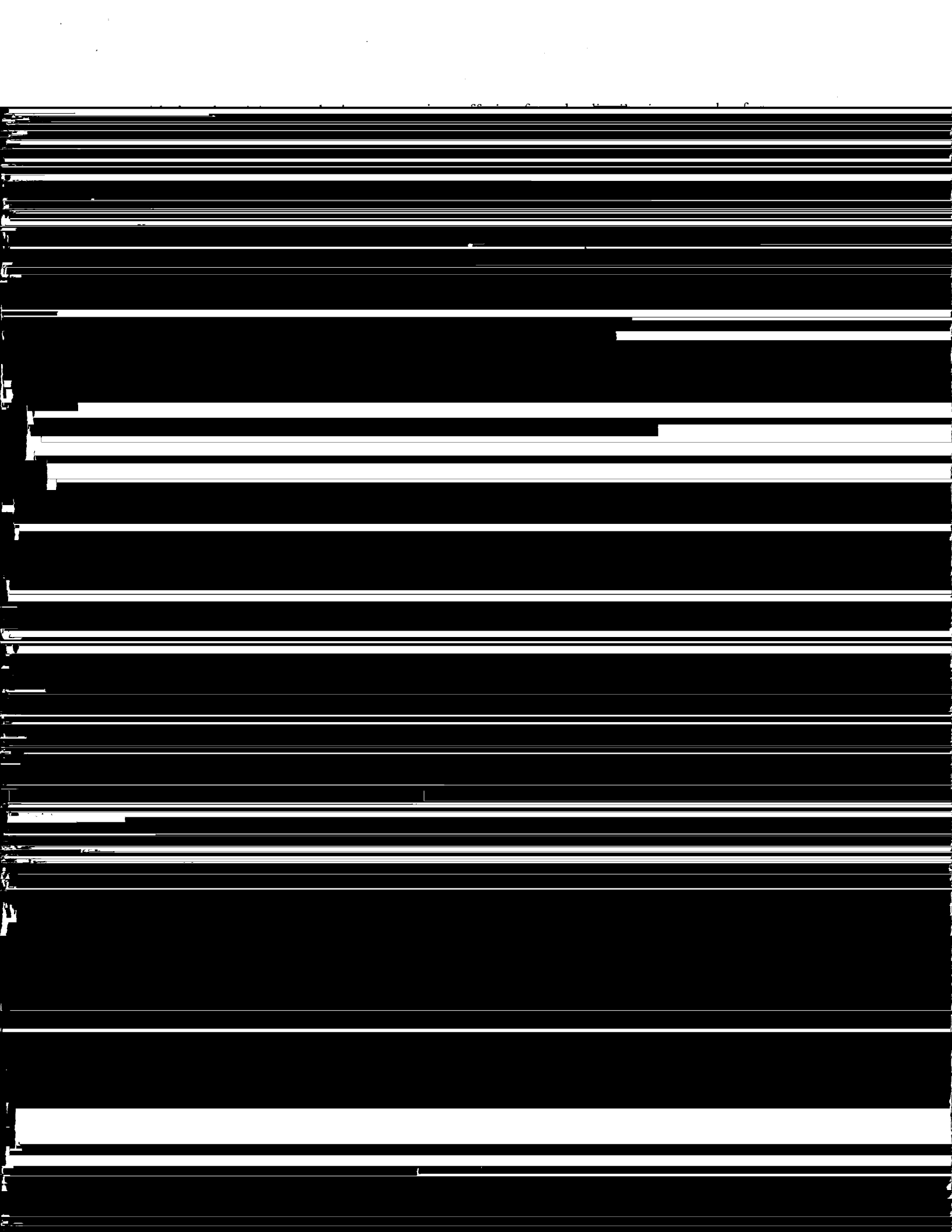
IT IS THEREFORE ORDERED AS FOLLOWS:

DEFINITIONS

I. For the purposes of this Order, the following definitions shall apply:

whether stored onsite with the computer used to generate them, stored offsite in another company facility or stored offsite by a third-party, such as in a disaster recovery center; and computers and related offline storage used by Defendants' participating associates, which may include persons who are not employees of the company or who do not work on company premises.

C. "Assets" means any legal or equitable interest in, right to, or claim to, any real and



www.henryheston.com.cnchost.com, and any other Web sites operated by Defendants or their officers, agents, servants, employees, and attorneys, and those persons in active concert or

ASSET FREEZE

V. IT IS FURTHER ORDERED that Defendants and their officers, agents, servants, employees, attorneys, and all persons or entities directly or indirectly under the control of any of them, including any financial institution, and all other persons or entities acting in concert or participation with any of them who are served with a copy of this Order by personal service, facsimile, or otherwise, are hereby temporarily restrained and enjoined from directly or indirectly:

A. Selling, liquidating, assigning, transferring, converting, loaning, encumbering, pledging, concealing, dissipating, spending, withdrawing, or otherwise disposing of any funds, real or personal property, or other assets or any interest therein, wherever located, including any assets outside the territorial United States, which are:

1. in the actual or constructive possession of any Defendant; or
2. owned or controlled by, or held, in whole or in part for the benefit of, or subject to access by, or belong to, any Defendant; or
3. in the actual or constructive possession of, or owned or controlled by, or subject to access by, or belong to, any corporation, partnership, trust or other entity directly or indirectly under the control of Defendant.

B. Opening or causing to be opened any safe deposit boxes titled in the name of any

D. Transferring any funds or other assets subject to this Order for attorneys' fees or living expenses, except from accounts or other assets identified by prior written notice to the



dissipation, conversion, sale, liquidation, or other disposal of any funds, documents, property, or other assets held by or under such entity's or person's control:

1. on behalf of, or for the benefit of, any Defendant or other party subject to Paragraph V above;

2. in any account maintained in the name of, or subject to withdrawal by, any Defendant or other party subject to Paragraph V above;

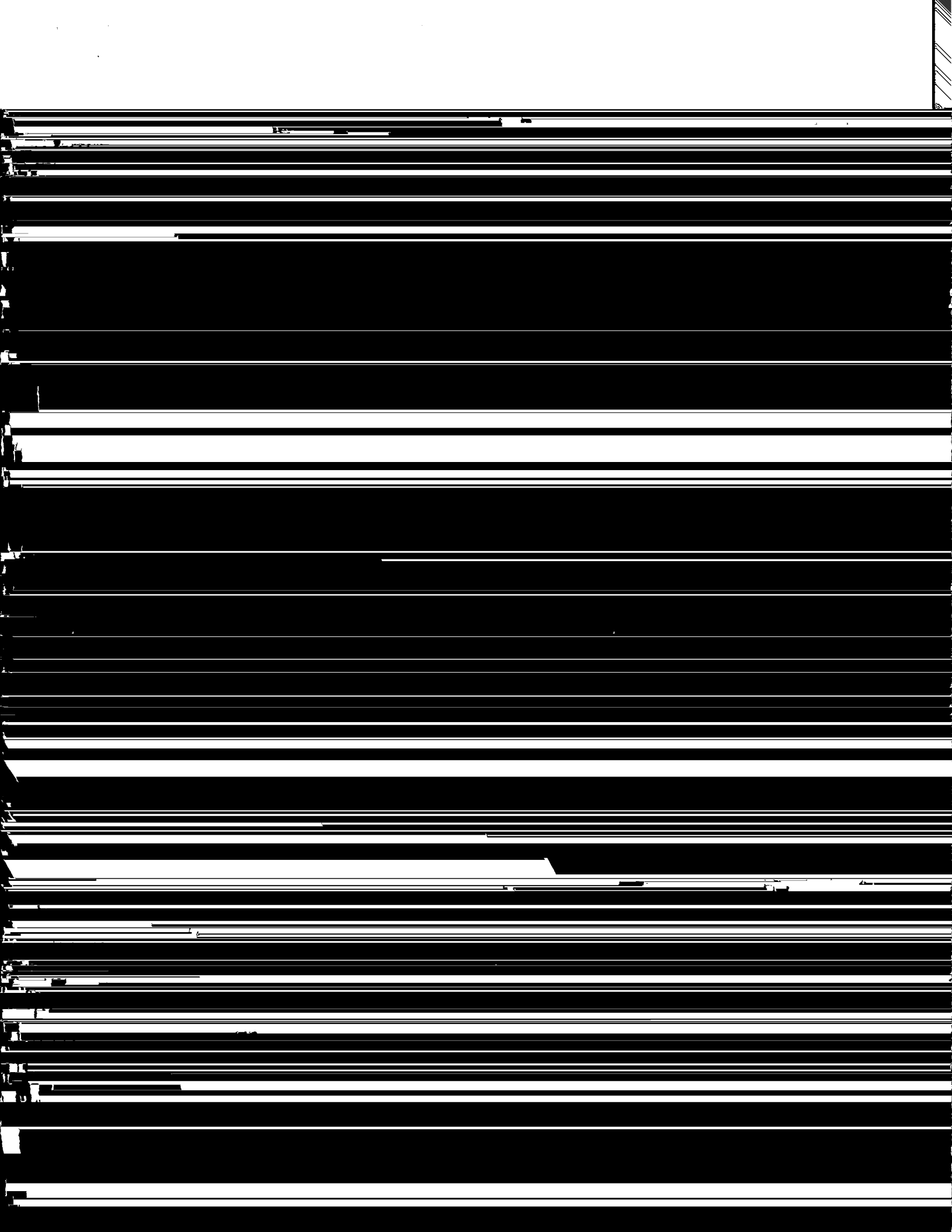
3. that are subject to access or use by, or under the signatory power of, any Defendant or other party subject to Paragraph V above;

B. Do not access to any safe deposit boxes that are either:

4. if the account, safe deposit box, or other asset has been closed or removed, the date closed or removed and the balance on said date.

[REDACTED]

[REDACTED]

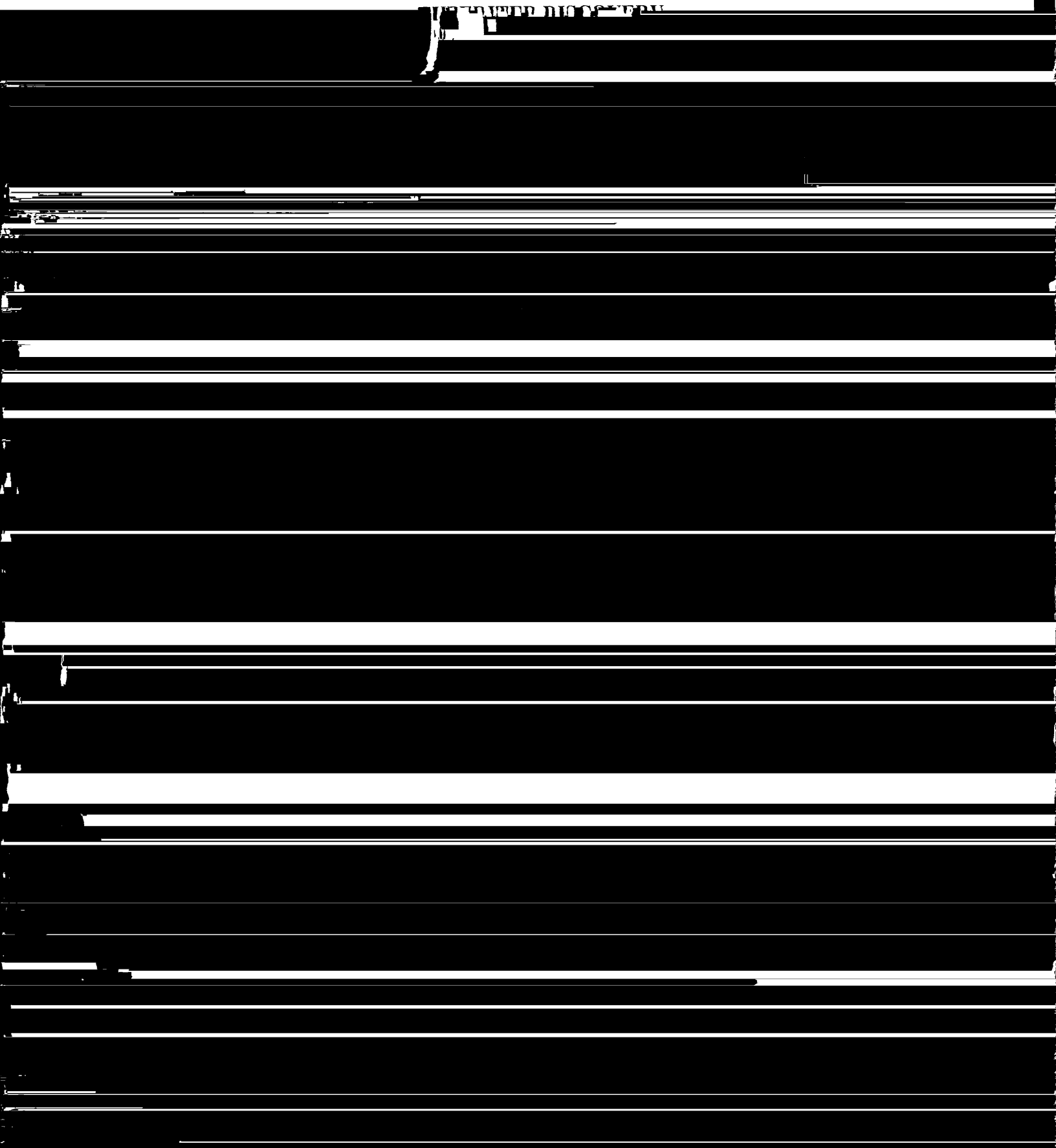


benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

B. transfer to the territory of the United States all assets, accounts or documents in foreign countries held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

C. shall retain all restricted assets, accounts or document and prevent any

a court order, until such time that all assets have been fully repatriated pursuant to Paragraph VIII of this Order.

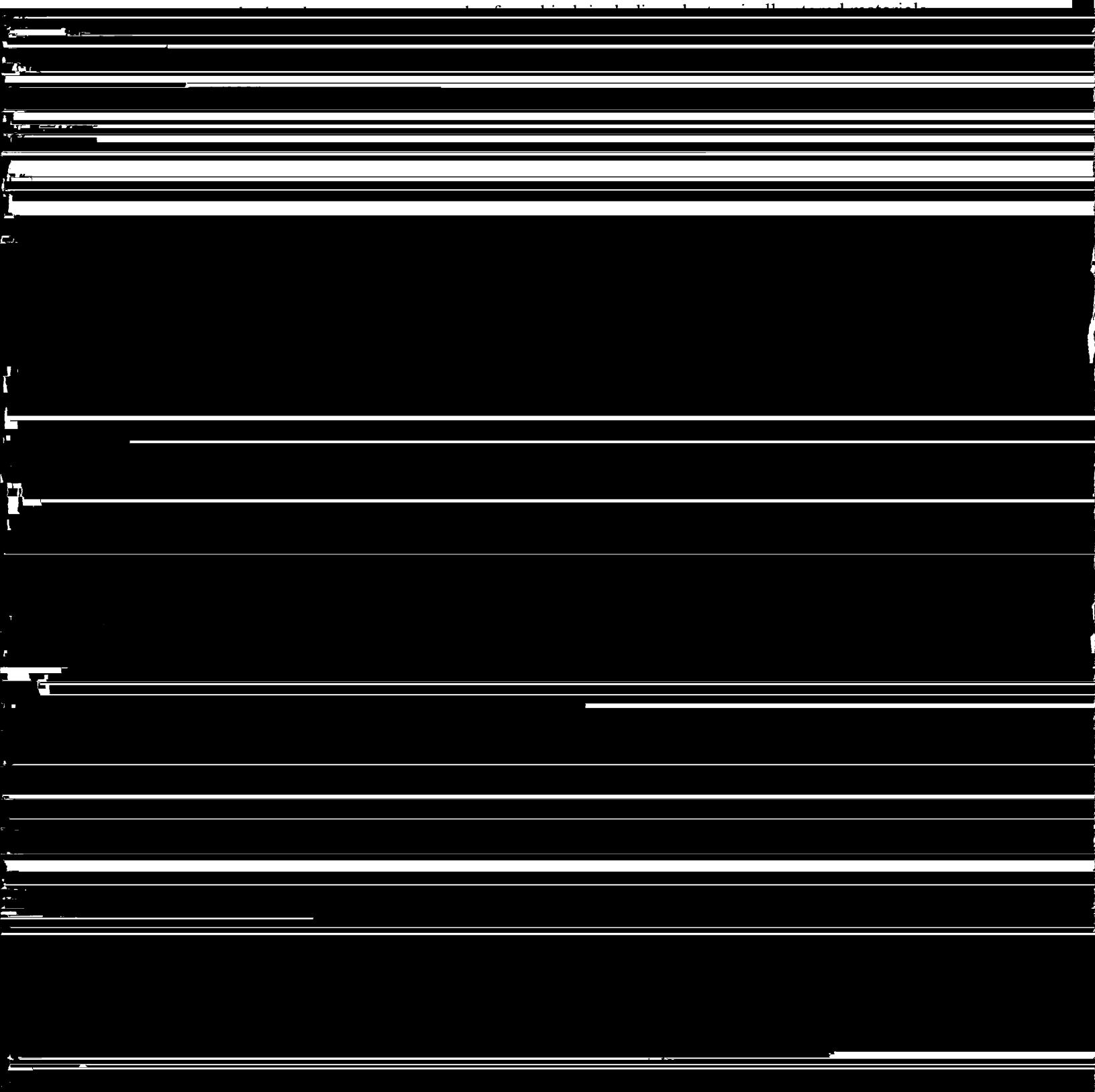


relating to the above that are requested by the FTC, within five (5) days of service of such request, with production of documents made to such person or place as counsel for the FTC may direct in writing.

WITHHOLDING OF MAIL SENT TO COMMERCIAL MAIL RECEIVING AGENCIES

XI. IT IS FURTHER ORDERED that ^{the RMC} ~~all~~ Commercial Mail Receiving Agencies ^{RMC} ("CMRA") where Defendants maintain accounts, ~~including those~~ ^{RMC} at 256 S. Robertson Blvd, Beverly Hills, California, shall, for the duration of this Order, retain and forward to Plaintiff, at the address

books, written or printed records, handwritten notes, telephone logs, "verification" or "compliance" tapes or other audio or video tape recordings, receipt books, invoices, postal receipts, ledgers, personal and business canceled checks and check registers, bank statements, appointment books, copies of federal, state or local business or personal income or property tax



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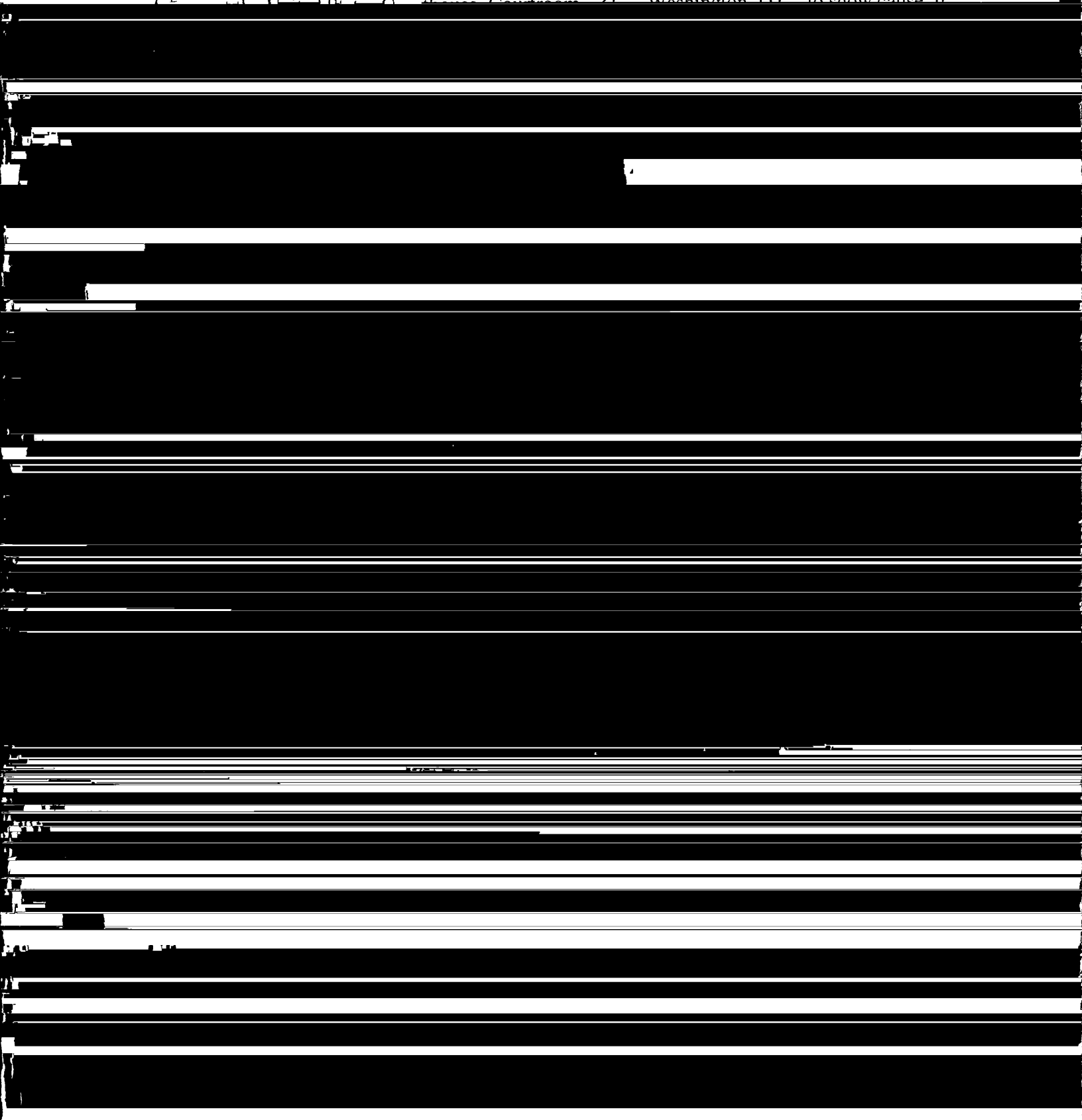
ORDER TO SHOW CAUSE

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

XV. IT IS FURTHER ORDERED, pursuant to Fed. R. Civ. P. 65(b), and LCvR 65.1, that

Defendants shall appear on the 24th day of January, 2003, at 9:30

1 at U.S. District Court, Courtroom 1 Washington, D.C. to show cause if



SERVICE OF THIS ORDER

XIX. IT IS FURTHER ORDERED that copies of this Order may be served by facsimile transmission, email transmission, personal or overnight delivery, or U.S. Mail, by agents and