

1 | TRACY S. THORLEIFSON
2 | MAXINE R. STANSELL
Federal Trade Commission

FILED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 DEFINITIONS

2 1. For purposes of this Order the following definitions shall apply:

3 2. "Donation" or "contribution" means money or any item of value provided
4 in response to a solicitation made on behalf, or in the name, of any nonprofit
5 organization, including any payment for advertising or any listing in any magazine,
6 journal or other publication produced by, or on behalf of, or in the name of, any
7 nonprofit organization.

8 3. "Donor" or "consumer" means any person or business solicited for a
9 donation or contribution.

10 4. "Material fact" means a fact likely to affect a person's decision as to the
11 amount of, or whether to make, a donation, contribution, or purchase.

12 5. "Nonprofit organization" means any person that is, or is represented to be,
13 a nonprofit entity or that has, or is represented to have, a charitable purpose,

14 specifically including any entity that purports to benefit either in whole or in part



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 A. The bond shall be conditioned upon compliance by defendant with Section
2 5 of the FTC Act, 15 U.S.C. § 45 ("Section 5"), and with the provisions of this Order.
3 The bond shall be deemed continuous and remain in full force and effect as long as
4 defendant continues to engage, participate or assist in any manner or in any capacity

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 1 | black ink against a light background, in print at least as large as the main text of the
- 2 | document, and enclosed in a box containing only the required disclosure.

1 "Monitor" means to use non-commissioned employees to listen to oral solicitations

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2

1 | terms of this Order. If, upon motion by the Commission, this Court finds that the
2 | defendant failed to disclose any material asset or source of income, or materially

[REDACTED]

[REDACTED]

[REDACTED]

1 **VI. ACKNOWLEDGMENT OF RECEIPT OF ORDER**

2 IT IS FURTHER ORDERED that, within five (5) business days after receipt of
3 this Order as entered by the Court, defendant Chinarian shall submit to the Commission
4 a truthful sworn statement, in the form shown on Appendix A, that shall acknowledge
5 receipt of this Order.

6
7 **VII. DISTRIBUTION OF ORDER BY DEFENDANT**

8 IT IS FURTHER ORDERED that, for a period of five (5) years after the date of
9 the entry of this Order, defendant shall:

[REDACTED]

[REDACTED]

[REDACTED]

1 | device, are hereby permanently restrained and enjoined from failing to create, and from
2 | failing to retain for a period of three (3) years following the date of each session unless

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 | nature of the business, and a statement of the defendant's duties and responsibilities in
2 | connection with the business or employment;

3 | 3. Any proposed change in the structure of any business that is

12

A. Within ten (10) days of receipt of written notice from a representative of

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

1 The parties hereby consent to the terms and conditions set forth above and
2 consent to entry of this Order without further notice to the parties. Defendants stipulate
3 and acknowledge that they have consented to entry of this Order freely and without

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

APPENDIX A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MITCHELL D. GOLD, *et al.*,

Defendants.

No. CV-99-2895-CBM (RZx)

AFFIDAVIT OF DEFENDANT

I, _____, being duly sworn, hereby state and affirm as follows:

1. My name is _____ My current residence address is

_____. I am a citizen of the United States

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing document to be served on all defendants by providing a true and correct copy thereof on the date set forth below by first-class mail, deposited with the United States Postal Service at Seattle, to:

◇ S. Daniel Harbottle, Rutan and Tucker, LLP (counsel for North

American Charitable Services, LLC, Marketing Mitchell Gold, Mitchell Gold, and

Celia Gold), 714-546-9035, 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626;

Washington:

◇ Frank Battaile, Battaile & Hargrave, LLP (counsel for Jonathan P.