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Hon. John C. Coughenour



02-CV-00294-ORD

FILED ENTERED

LODGED RECEIVED

JUL 1 2003 DJ

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

DILLON SHERIF, *et al.*

Civil No. CV02-0294C

STIPULATED ORDER FOR
PERMANENT INJUNCTION
AND OTHER EQUITABLE

1 The Commission and defendant Melissa Robinson (“defendant” or “defendant
2 Robinson”), having been represented by counsel and acting by and through such counsel, have
3 consented to the entry of this Stipulated Order for Permanent Injunction and Other Equitable
4 Relief without a trial or adjudication of any issue of law or fact herein.

5 NOW, THEREFORE, the Commission and defendant Robinson, having requested the
6 Court to enter this Stipulated Order, it is **ORDERED, ADJUDGED, AND DECREED** as
7 follows:

8 **FINDINGS**

9 1. This is an action by the Commission instituted under Section 13(b) of the FTC
10 Act, 15 U.S.C. § 53(b). Pursuant to this section, the Commission has the authority to seek the
11 relief contained herein.

12 2. The Commission’s complaint states a claim upon which relief may be granted
13 against defendant Robinson under Sections 5(a), 13(b) and 19 of the Federal Trade Commission
14 Act (“FTC Act”), 15 U.S.C. §§ 45(a), 53(b) and 57b, and the Telemarketing and Consumer Fraud
15 and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. § 6101 *et seq.*

16 3. This Court has jurisdiction over the subject matter of this case and all parties
17 hereto. Venue in the Western District of Washington is proper.

18 4. The alleged activities of defendant are in or affecting commerce, as defined in

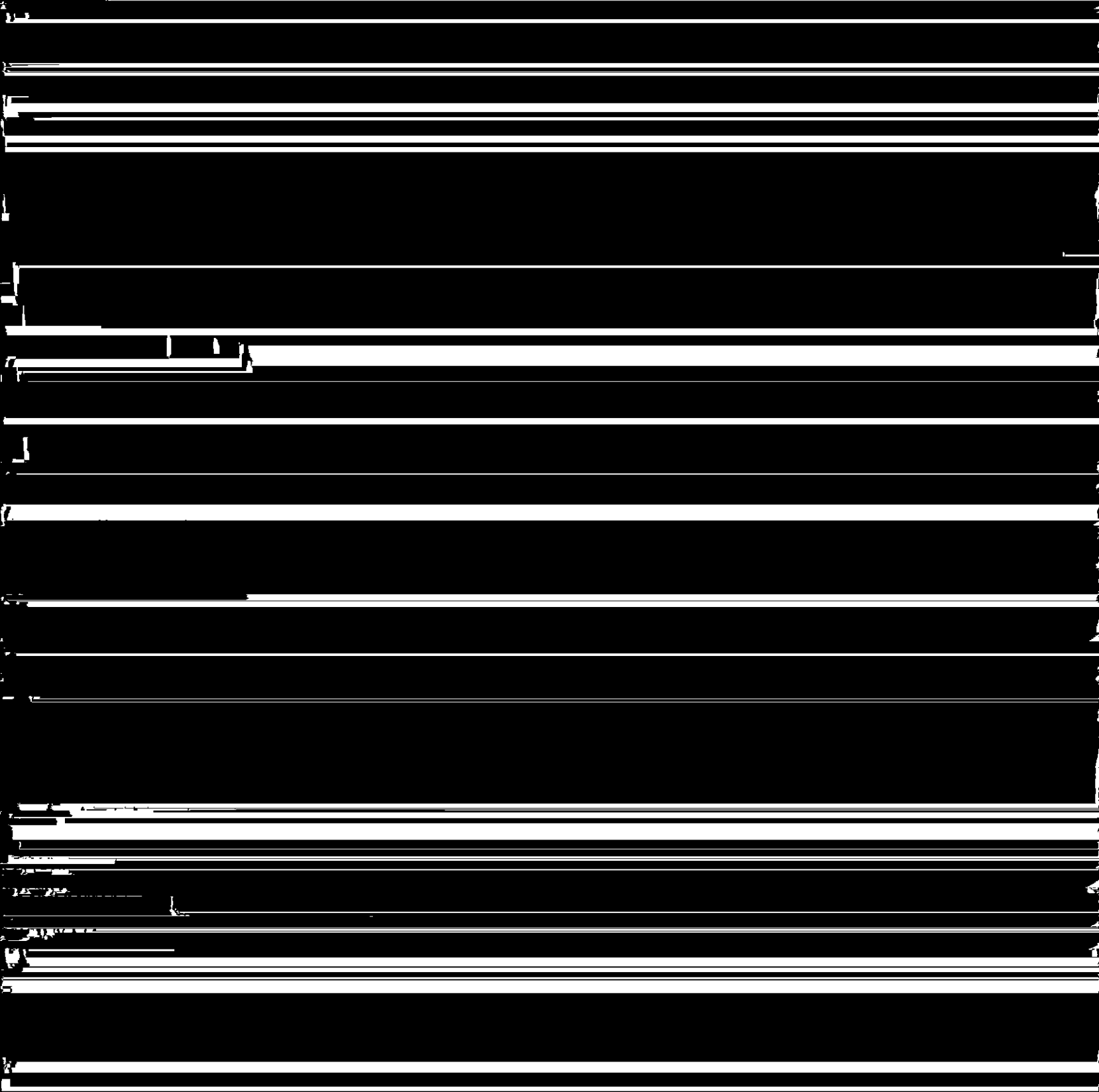
1 persons in active concert or participation with her who receive actual notice of this Order by
2 personal service or otherwise, are hereby restrained and enjoined from:

3 A. Promoting, offering for sale, or selling, directly or indirectly, tickets, chances,
4 interests, shares, or registrations in any foreign lottery to any U.S. resident;

5 B. Purchasing or registering any ticket, chance, interest, or share in any foreign
6 lottery for any U. S. resident;

7

1. disclosing the name, address, telephone number, credit card number, bank account, 1



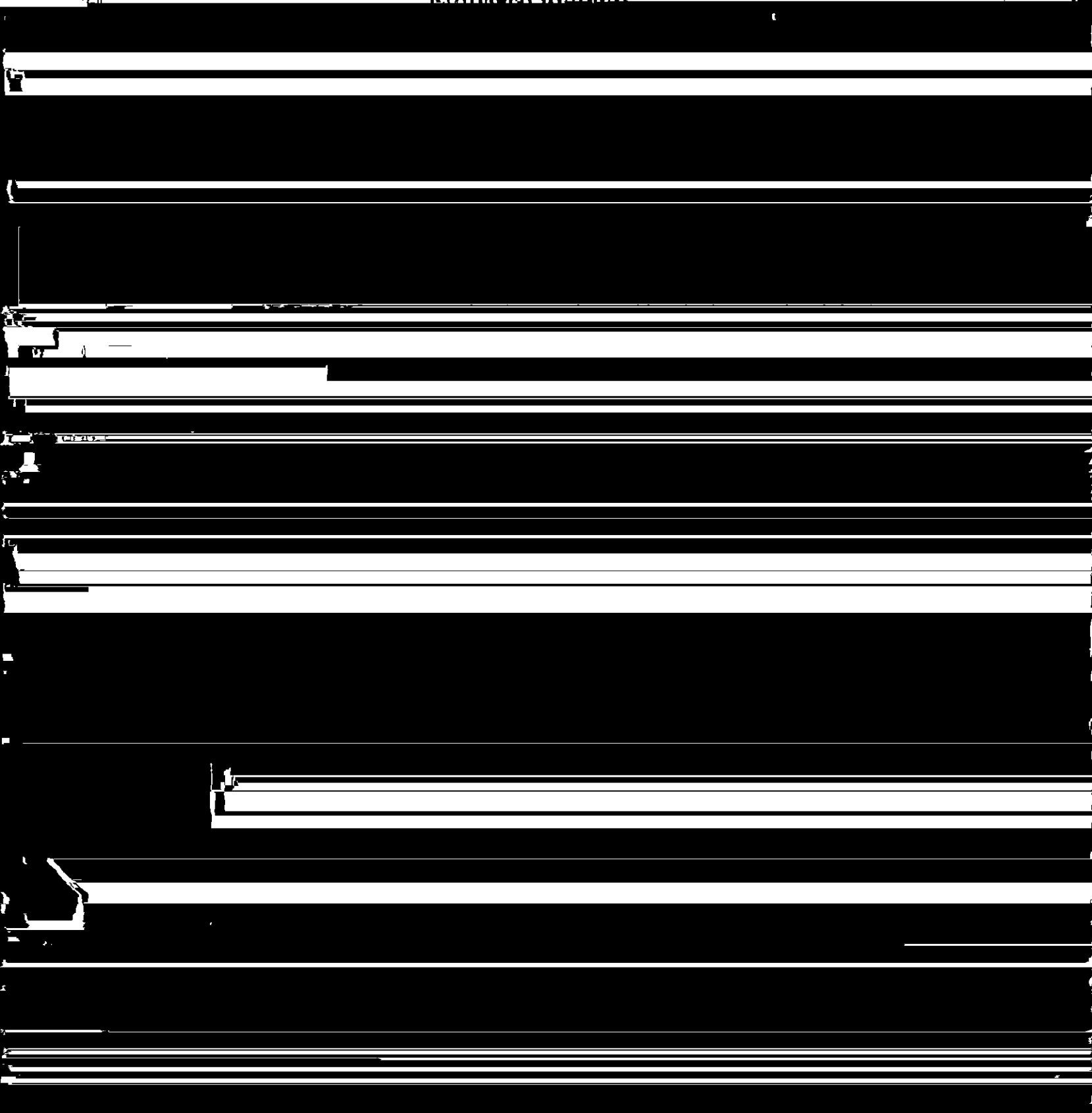
1 of remedies under this Paragraph.

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IV.

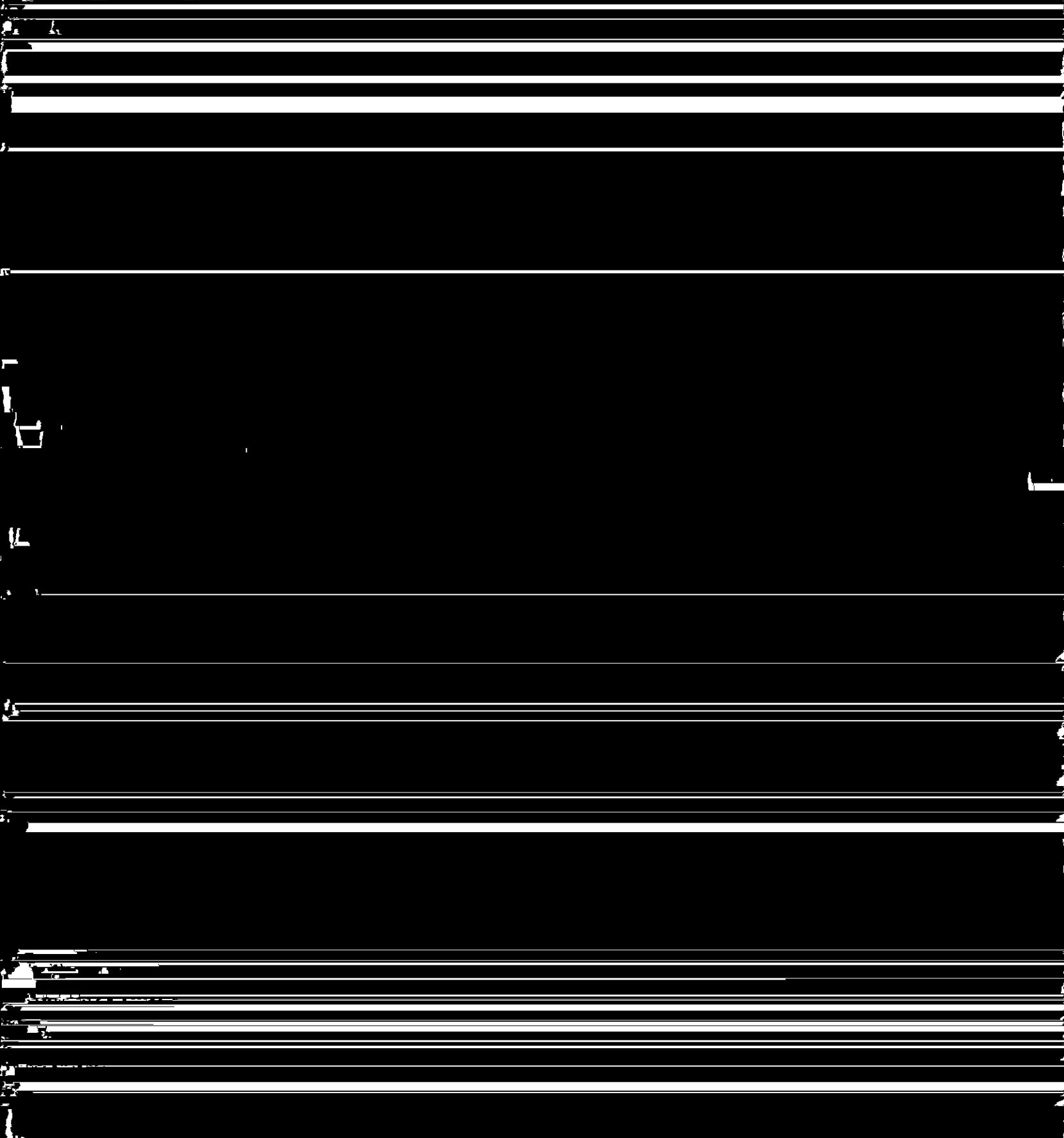
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EXHIBIT TO AGREEMENT



1 | direct or indirect control to inspect the business operation;

2 | *Provided that defendant's business operations are not*



1 Defendant Robinson shall secure from each such person a signed and dated statement
2 acknowledging receipt of the Stipulated Order within thirty (30) days after the date of service of
3 the Stipulated Order or the commencement of the employment relationship.

4 **VII.**

5 **COMPLIANCE REPORTING BY DEFENDANT**

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

8 A. For each of the following categories of persons, the defendant shall file a compliance report with the court within 30 days of the date of service of this Stipulated Order.

1 C. For the purposes of this Stipulated Order, defendant shall, unless otherwise
2 directed by the Commission's authorized representatives, mail all written notifications to the
3 Commission to:

4 Charles A. Harwood, Director
5 Northwest Region
6 Federal Trade Commission
7 915 Second Ave., Suite 2896
8 Seattle, WA 98174

9 Re: *FTC v. Dillon Sherif, et al.*, Civil Action No. CV02-0294C

10 D. For purposes of the compliance reporting required by this Paragraph, the
11 Commission is authorized to communicate directly with defendant Robinson.

12 **VIII.**

13 **RECORD KEEPING PROVISIONS**

14 **IT IS FURTHER ORDERED** that, for a period of three (3) years from the date of entry
15 of this Stipulated Order, defendant Robinson, and defendant's agents, employees, officers,
servants, corporations, successors, and assigns, and those persons in active concert or
participation with them who receive actual notice of this Stipulated Order by personal service or

1 the extent such information is obtained in the ordinary course of business;

2 D. Complaints and refund requests (whether received directly, indirectly or through
3 any third party) and any responses to those complaints or requests; and

4 E. Copies of all sales scripts, training materials, advertisements, or other marketing
5 materials.

6 **IX.**

7 **ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANT**

8 IT IS FURTHER ORDERED that defendant Robinson, within five (5) business days of
9 receipt of this Stipulated Order as entered by the Court, must submit to the Commission a
10 truthful sworn statement acknowledging receipt of this Stipulated Order.

11 **X.**

12 **RETENTION OF JURISDICTION**

13 IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for
14 purposes of construction, modification and enforcement of this Stipulated Order.

15 **SO ORDERED**, this ____ day of _____, 2003, at _____.m.
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