

WILLIAM E. KOVACIC

General Counsel

BARBARA ANTHONY

Regional Director

Northwest Region

of Cyberrebate.com ("Cyberrebate"), pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), alleging violations of Section 5 of the FTC Act, 15 U.S.C. §§ 45.

The Commission and Defendants have agreed to the entry of this Stipulated Final Order for Permanent Injunction ("Order") and have requested that the Court enter the same to resolve all matters of dispute between them in this action without trial or adjudication of any issue of law or fact herein.

NOW THEREFORE the Commission and Defendants hereby stipulate and agree that the Court should enter the

this Order. IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Commission and Defendants shall comply with the terms of this Order.

3. The Complaint states a claim upon which relief can be granted, and the Commission has authority to seek the relief it has requested under Sections 5 and 13(b) of the FTC Act, 15 U.S.C. §§ 45 and 53(b).

4. The acts and practices of the Defendants were or are in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

5. Defendants waive all rights to seek judicial review of this Order.

the validity of this Order. Defendants also waive any claim that they may have held under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action to the date of this Order.

6. This action and the relief awarded herein are in addition to and not in lieu of any other relief available to the Commission.

1. "Rebate" shall mean the return of part or all of a payment in the form of cash, credit towards future purchases, merchandise, services, or any other consideration offered to consumers who

2. "Mail Order Rule" shall mean the Federal Trade Commission's Trade Regulation Rule Concerning Mail or Telephone Order Merchandise, 16 C.F.R. Part 435, or as the Rule may hereafter

3. Defendants shall mean Joel Granik and Joseph Lichter.

CONDUCT PROHIBITIONS

PERMANENT BAN

I.

II.

IT IS HEREBY ORDERED that Defendants Joel Granik and Joseph Lichter, directly or through any corporation, subsidiary, division, or other device, in connection with the

[REDACTED]

E. fail to provide any rebate in the form of services or any other consideration (other than cash, credit towards future purchases, or merchandise) within the time specified, or, if

option of either:

(1) ~~agreeing to the following~~

(2) canceling the rebate request and promptly receiving reasonable cash compensation instead of the rebate originally offered; or

F. misrepresent, in any manner, expressly or by implication, any material terms of any

escrow under this section shall be paid by Defendants to the Federal Trade Commission within 4 _____

(2) business days after _____

Court Judge. Defendants may prepay any amounts due under this paragraph without any penalty.

these security interests under the appropriate state laws. Defendant's failure to perfect these security interests

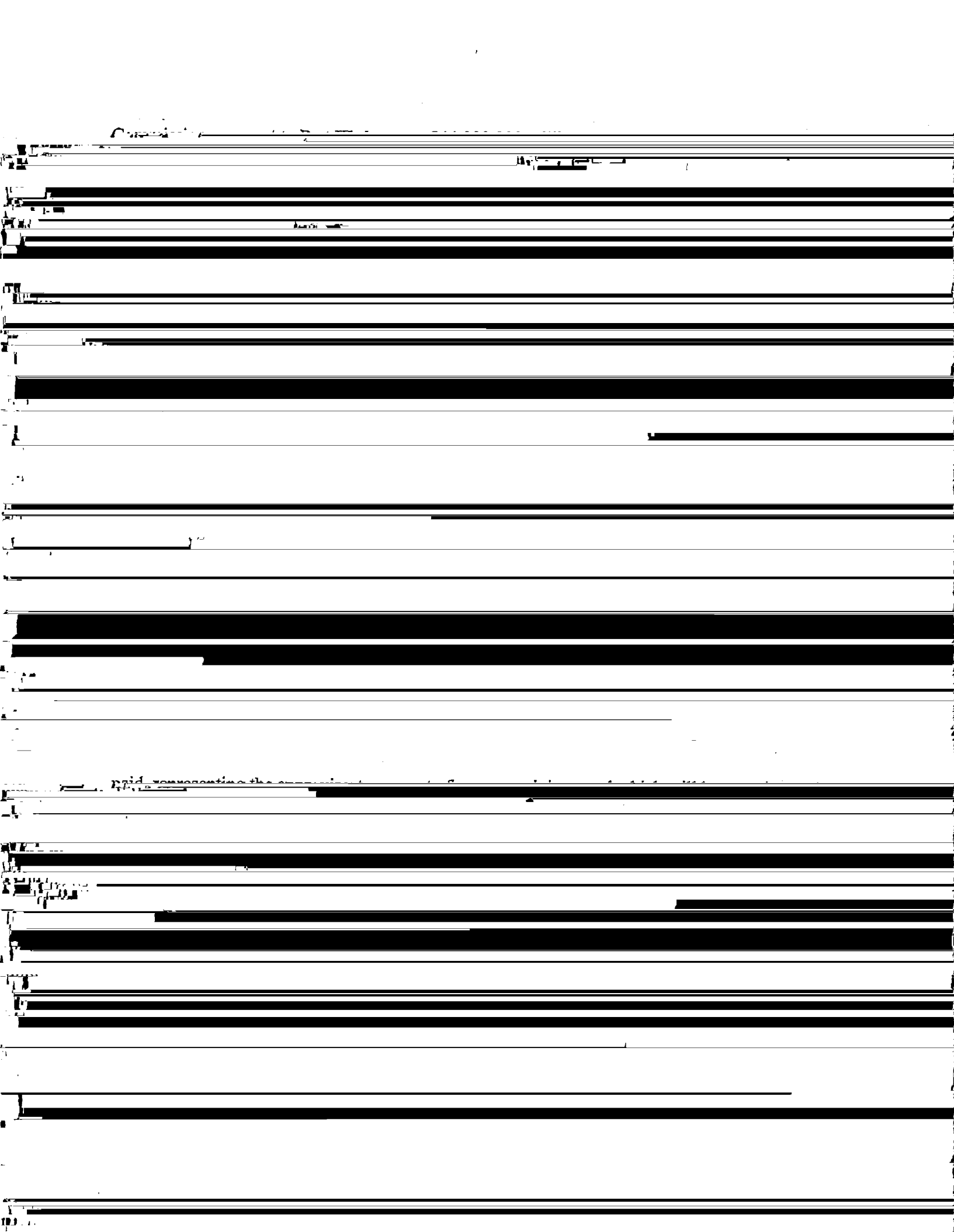
Commission an executed sworn statement attesting to the steps taken to perfect the security interest

and the amount of the debt secured by the collateral.

deemed a payment of any fine, penalty, or punitive assessment.

F. Defendants expressly waive their rights to litigate the issue of disgorgement. Defendants acknowledge and agree that all monies paid pursuant to this Order shall be distributed to the Plaintiff.

G. Defendants shall also furnish to the Plaintiff, in accordance with 31 U.S.C. § 7701, their taxpayer identification numbers (social security numbers, if applicable).



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paid representing the...

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Lichter, without the necessity of identification or prior notice;

C. Joel Granik and Joseph Lichter shall permit representatives of the Commission to

(b) Any changes in employment status (including self-employment) of Individual Defendant, and any change in the ownership of the Individual Defendant in

any business entity with a 10% or greater ownership interest.

B. One hundred eighty (180) days after the date of entry of this Order, Joel Granik and Joseph Lichter each shall provide a written report to the FTC

setting forth in detail the manner and form in which they have complied and are complying with this Order. This report shall include, but not be limited to:

(1) For each Individual Defendant:

a. The then-current residence address

numbers of the Individual Defendant;

b. The then-current employment and business addresses and telephone

C. For the purposes of this Order, Defendants shall, unless otherwise directed by the

Regional Director for Northeast Region

1 Bowling Green, Suite 318
New York, NY 10004

Re: FTC v. Intel Corporation, et al., No. 17-10000

B. accounting records that reflect the cost of goods or services sold, revenues generated, and the disbursement of such revenues; amount of contracts

rejected;

C. personnel records accurately reflecting: the name, address, and telephone number of each person employed in any capacity by such business, including as an independent

contractor; that person's job title or position; and

IT IS FURTHER ORDERED that, for a period of three (3) years from the date of entry of this Order, Defendants Joel Granik and Joseph Lichter shall deliver a copy of this Order as directed below:

A Joel Granik and Joseph Lichter as Control Person: For any business that

Defendants Joel Granik or Joseph Lichter controls, directly or indirectly, in which Defendants J. G. [redacted]

Granik or Joseph Lichter have a majority interest. Defendants J. G. [redacted]

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

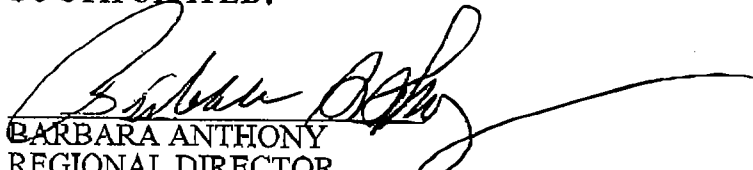
RETENTION OF JURISDICTION

X.

~~IT IS FURTHER ORDERED THAT THE COURT SHALL RETAIN JURISDICTION OVER THE PARTIES TO THIS ORDER FOR THE~~

purposes of construction, modification and enforcement of this Order.

SO STIPULATED:


BARBARA ANTHONY
REGIONAL DIRECTOR
NORTHEAST REGION

