









1 **CIVIL PENALTY**

2 **III.**

3 **IT IS FURTHER ORDERED** that judgment in the amount of \$286,000 is hereby entered  
4 against Defendant as a civil penalty, pursuant to Section 5(m)(1)(A) of the Federal Trade  
5 Commission Act, 15 U.S.C. § 45(m)(1)(A).

6 A. Defendant shall pay the civil penalty according to the following schedule. Prior to  
7 or concurrently with its execution of this Order, Defendant shall turn over \$50,000 to its attorney,  
8 who shall hold this sum for no purpose other than payment to the Treasurer of the United States

after entry of this Order by the Court. Within five (5) days of receipt of notice of the entry of this

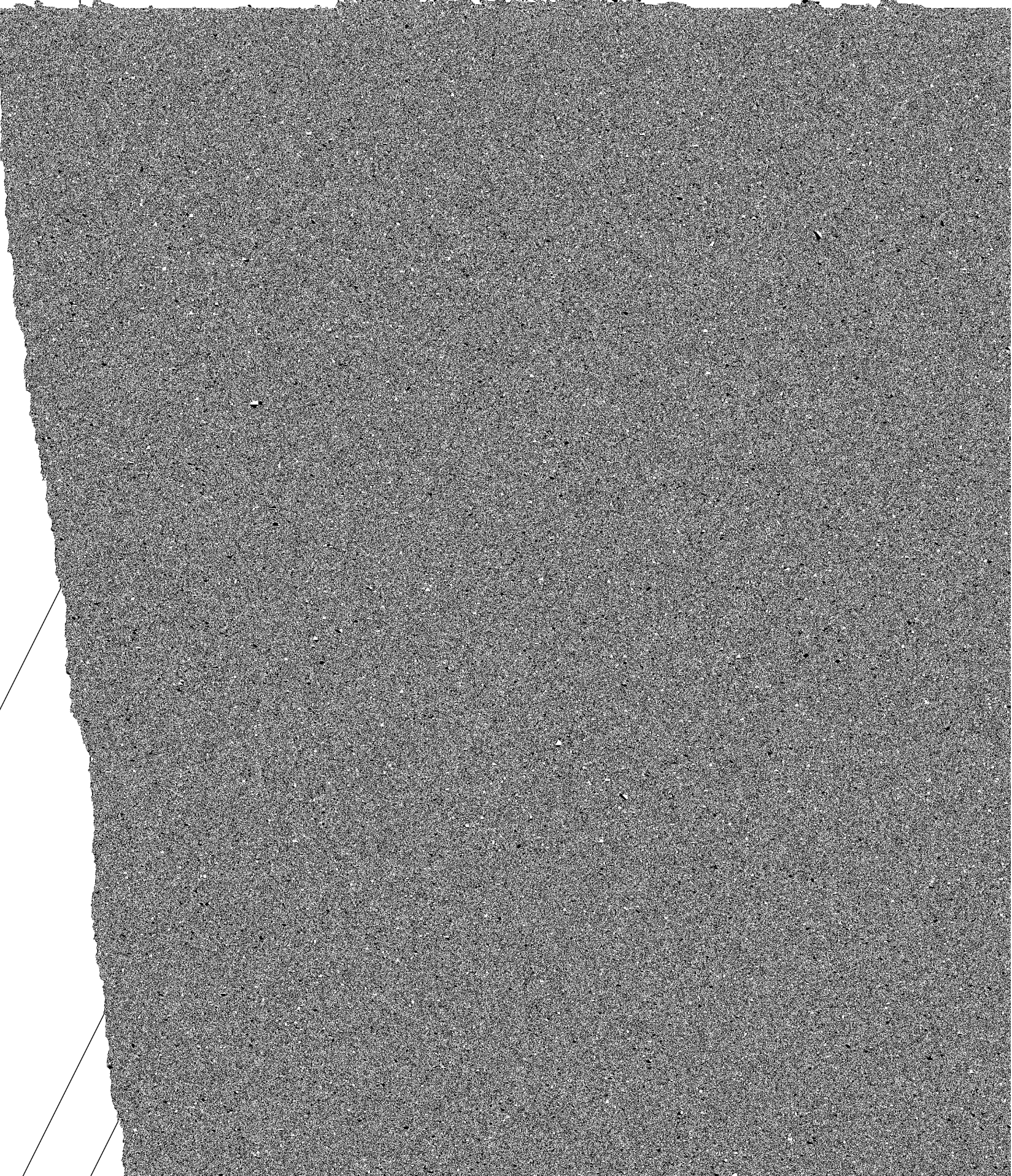








**RECORD KEEPING PROVISIONS**





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G. All records and documents necessary to demonstrate full compliance with each provision of this Order, including but not limited to, copies of signed and dated acknowledgments of receipt of this order, required by Paragraph VII of this Order, and all reports submitted to the FTC pursuant to Paragraphs IV and V;

**DISTRIBUTION OF ORDER BY DEFENDANT**











