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The Honorable Ricardo S. Martinez



DEFINITIONS

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1. "Atlas" means Atlas Marketing, Inc., a corporation, its divisions and subsidiaries, its successors and assigns, and its officers, agents, representatives, and employees.

2. "Christensen" means Scott B. Christensen, individually and as an officer and director of Atlas.

3. "Defendants" means John Stefanchik, Scott B. Christensen, Beringer Corporation, and Atlas Marketing, Inc.

4. "Stipulating Defendants" means Scott B. Christensen and Atlas Marketing, Inc., and each of them by whatever names each might be known, as well as their successors and



9 "Target product or service" means course materials, in-person workshons

1 the Stipulating Defendants and any affiliated entity and any entities of which either of the
2 Stipulating Defendants have direct or indirect control.

3 C. The funds, property, and assets affected by this Part shall include both existing
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1 A. Failing to create and maintain documents that, in reasonable detail, accurately,
2 fairly, and completely reflect the Stipulating Defendants' incomes, disbursements, transactions,
3 and use of money, beginning as of the date of entry of this Order;

4 B. Failing to make and keep books, records, accounts, bank statements, current
5 accountants' reports, general ledgers, general journals, cash receipt ledgers, cash disbursement
6 ledgers and source documents, documents indicating title to real or personal property, and any
7 other documents or electronic data which, in reasonable detail, accurately and fairly reflect the

1. indirectly manages or controls the business, and (2) the business is engaged in telemarketing or

[REDACTED]

VII. SERVICE OF THIS ORDER BY PLAINTIFF

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PLAINTIFF'S SERVICE OF THIS ORDER BY PLAINTIFF

[REDACTED]

