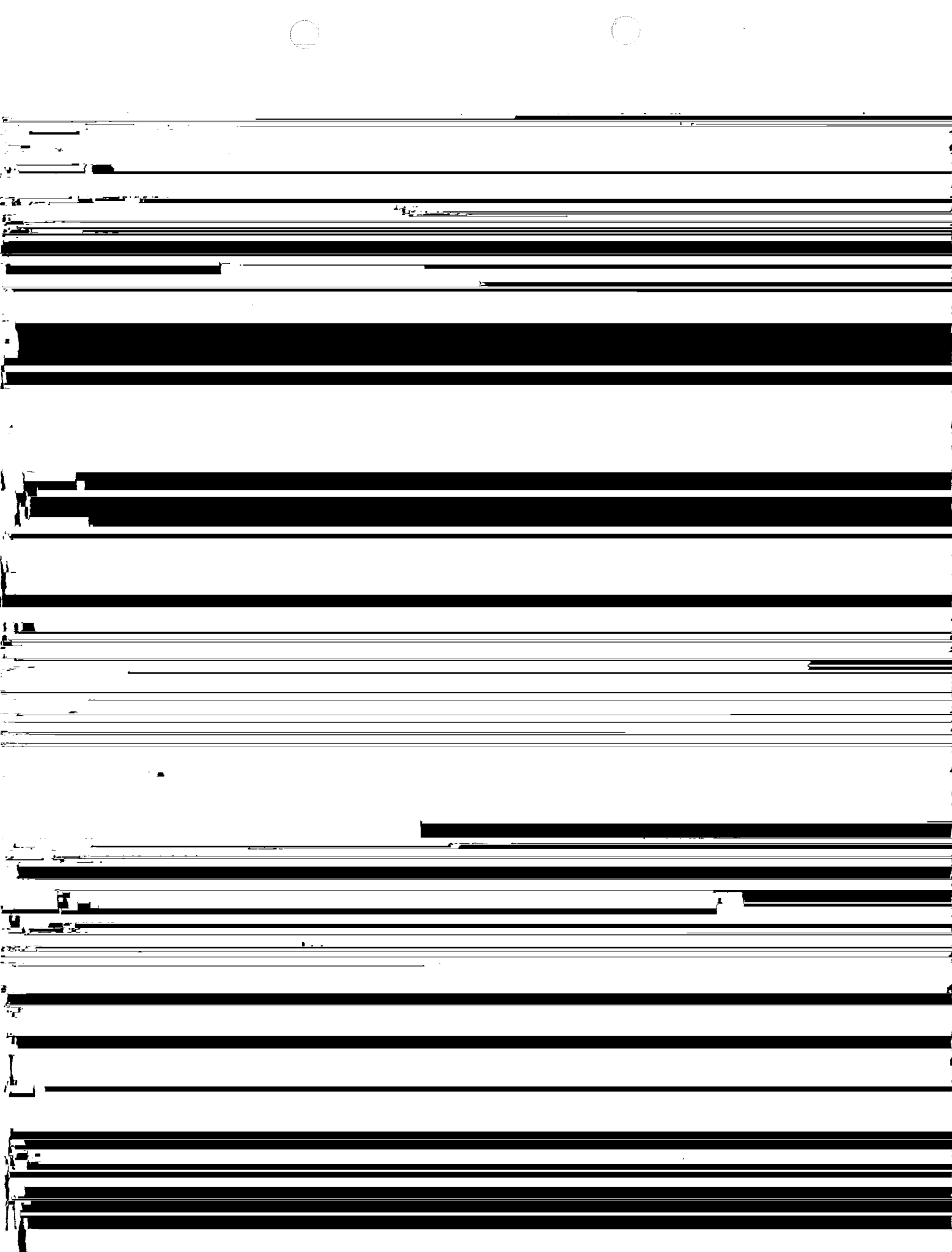


COPY

1 JENNIFER LARABEE, Cal. Bar No. 163989

JENNIFER LARABEE, Cal. Bar No. 163989



[REDACTED]

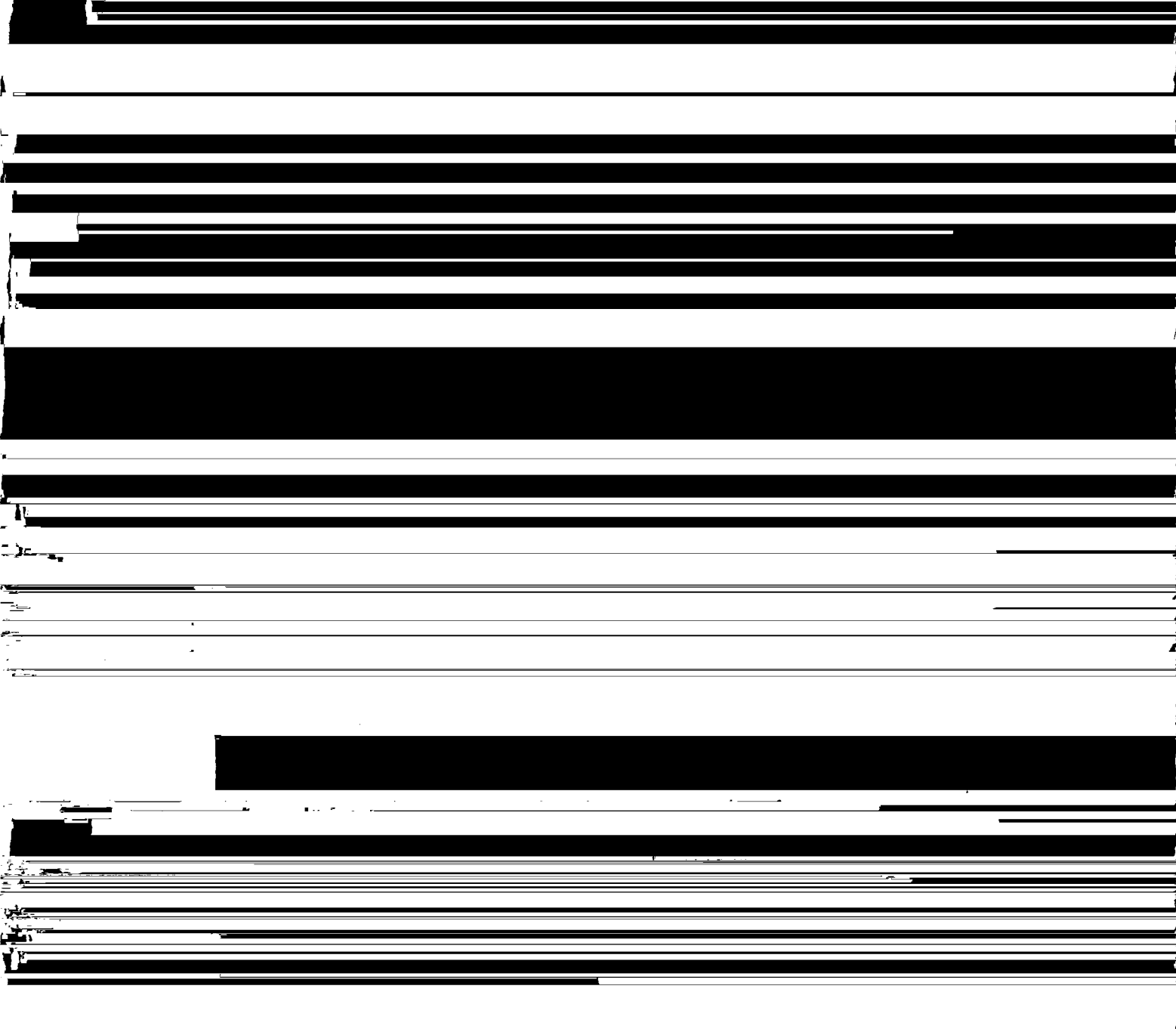
1 Defendant HAINES under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C.
2 §§ 45(a) and 53(b); under the TSR, 16 C.F.R. Part 310; under Subtitle A of Title V
3 of the GLB Act, 15 U.S.C. §§ 6801 through 6809, and under the Privacy Rule, 16
4 C.F.R. Part 313.

5 6. Plaintiff has the authority under Sections 13(b) and 19 of the FTC Act,
6 15 U.S.C. § 53(b) and § 57, to seek the relief it has requested.

7

1 instruments, equipment, fixtures, general intangibles, effects, leaseholds, mail or
2 other deliveries, inventory, checks, notes, accounts, credits, receivables, and all cash,
3 wherever located.

4 2. "Document" is synonymous in meaning and equal in scope to the usage
5 of the term in Federal Rule of Civil Procedure 34(a), and includes writings,
6 drawings, graphs, charts, photographs, audio and video recordings, electronic mail
7 ("email"), computer records, and other data compilations from which information



1

8. **"Debt negotiation"** means:

2

a. the business or practice of receiving in return for consideration.

[REDACTED]

[REDACTED]

[REDACTED]

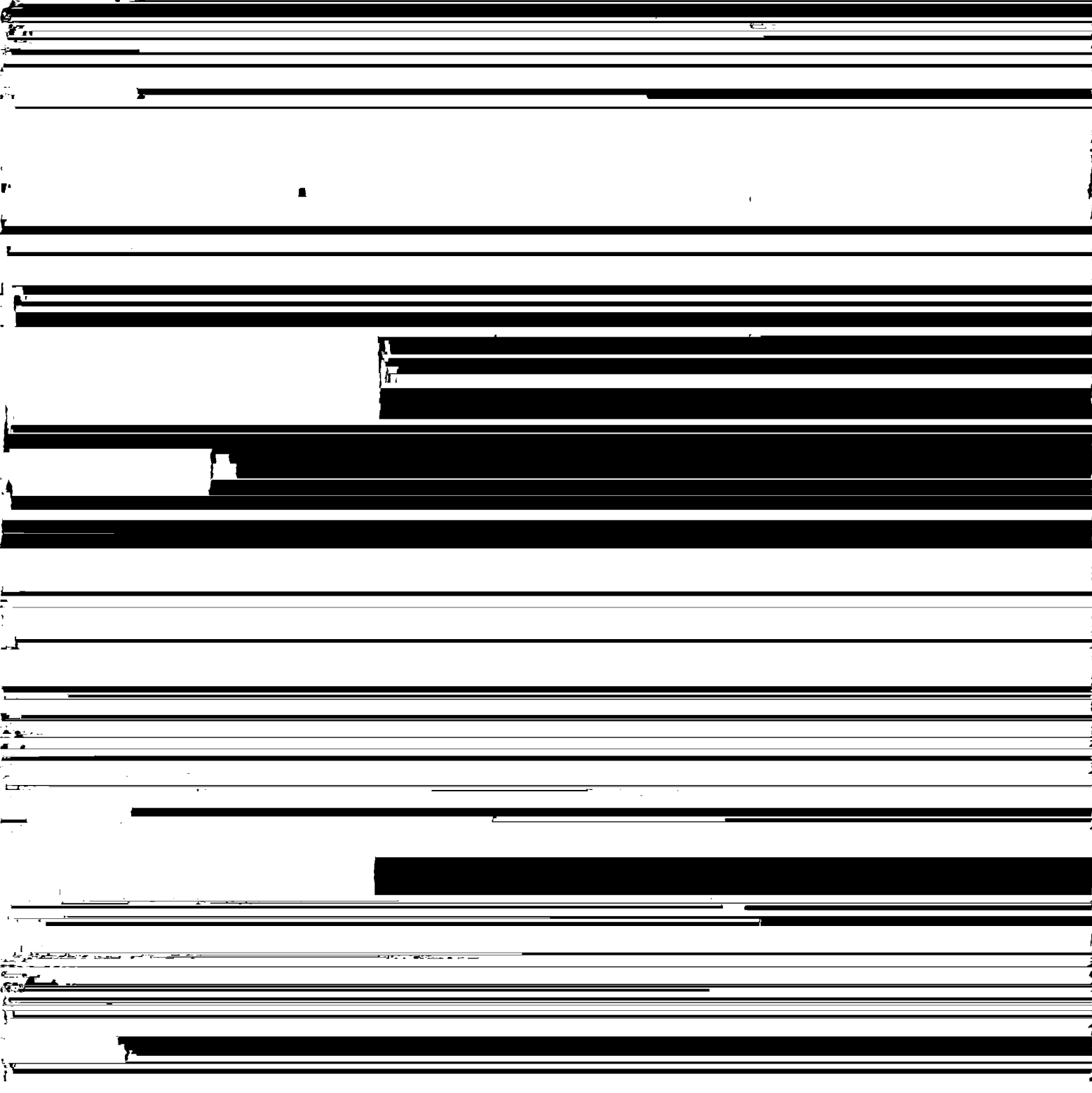
[REDACTED]

[REDACTED]

[REDACTED]

1 telephone call. The term does not include the solicitation of sales through the
2 mailing of a catalog which: contains a written description or illustration of the goods
3 or services offered for sale; includes the business address of the seller; includes
4 multiple pages of written material or illustrations; and has been issued not less

5



1 | appears;

2 | h in communications disseminated orally that the message shall be

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 | 20. "National Do Not Call Registry" means the National Do Not Call
2 | Registry maintained by the Federal Trade Commission pursuant to 16 C.F.R.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

1 unless the seller proves:

2 1. The seller has obtained the express agreement, in writing, of such
3 person to place calls to that person. Such written agreement shall
4 clearly evidence such consumer's authorization that calls made
5 by or on behalf of a specific party may be placed to that person,
6 and shall include the telephone number to which the calls may be
7 placed and the signature of that person; or

8 2. The seller has an established business relationship with such


1 | given area code without first paying the required annual fee for access to the
2 | telephone numbers within that area code that are on the National Do Not Call

1
2
3
4

V.

PROHIBITION ON VIOLATING
THE GRAMM-LEACH-BLILEY ACT

IT IS FURTHER ORDERED that when acting as or on behalf of a financial



1 million, three hundred thirty-three thousand, two hundred ninety-three dollars)
2 upon a showing by the Commission that Defendant failed to make the
3 payments as set forth under Paragraph VI A.

3. Delegate any and all tasks connected with such restitution.

[REDACTED]

1 | and will become immediately due and payable, less any payments already
2 | made.

3 |

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1

2

IX.

COMPLIANCE MONITORING

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

X.

COMPLIANCE REPORTING BY DEFENDANT

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

A. For a period of five (5) years from the date of entry of this Order.



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XI.

RECORDS MANAGEMENT PROVISIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1

XIII.

2

ACKNOWLEDGMENT OF RECEIPT OF ORDER

XV.

RETENTION OF JURISDICTION

1
2
3

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this
Order for the purpose of modification and enforcement of this Order