

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

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FEB 9 2006

FEDERAL TRADE COMMISSION, )

Plaintiff, )

v. )

AMERIDEBT, INC., et al., )

Defendants. )

Civil No. PJM 03-3317

**STIPULATED FINAL JUDGMENT AND ORDER AS TO PAMELA PUKKE**

Plaintiff, the Federal Trade Commission ("Plaintiff," "FTC" or "Commission"), has filed a Complaint for permanent injunctive and other equitable relief pursuant to Sections 5(a) and 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 45(a) and 53(b), and Sections 503 and 505(a)(7) of the Gramm-Leach-Bliley Act ("GLB Act"), 15 U.S.C. §§ 6803 and 6805(a)(7). The Complaint charges the Defendants with unfair or deceptive acts or practices in promoting and offering credit counseling and debt management plans in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). The Complaint also names Pamela Pukke a/k/a Pamela



2. The Complaint states a claim upon which relief may be granted against Pamela Pukke under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).
3. The activities of Pamela Pukke charged in the Complaint are in or affecting commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
4. Any and all funds paid pursuant to this Order were derived unlawfully from payments by consumers as a consequence of the acts and practices alleged in the FTC's complaint. Further, Pamela Pukke does not have a legitimate claim to those funds. Therefore, any and all funds paid pursuant to this Order are held in

5. Pamela Pukke waives all rights to seek judicial review or otherwise challenge or



sale of that property; *provided however*, that upon the sale of the Allison Road property, Pamela Pukke will receive one-half of the net proceeds of the sale (after the payment of all valid liens of record and reasonable and customary closing costs incurred in connection with such sale, including brokerage fees), not to exceed \$500,000, and hereby irrevocably assigns to the Commission any amount of her share in excess of \$500,000, *provided*

she will receive said proceeds only if (i) she

referenced in Subsection II.A.:

1. The Citibank bank account held in her name; and
  2. The Secondary Life One, LP investment held in her name.
- C. Pamela Pukke releases and waives any statutory, common law, or other

property, or to any other real or

personal property in which Pamela Pukke has any interest as of the date of this Order and shall not declare or claim any homestead exemption in the Allison Road property or such other property. Pamela Pukke also releases and waives any statutory, common law or other exemption

held by the Receiver

class, and for plaintiffs' attorneys' fees and costs as approved by the Court in the Nationwide

that the ETC reserves the right to object to the amount of

**II. RIGHT TO REOPEN**

A. The Commission's agreement to, and the Court's approval of, this Order as to Pamela Pukke is expressly premised upon the truthfulness, accuracy, and completeness of Pamela Pukke's financial condition, as represented in her financial statement dated July 20, 2005, including any attachments, and in any other documents or testimony submitted by Pamela Pukke, upon which the Commission relied in negotiating and agreeing to the terms of this Order. By agreeing to this Order, Pamela Pukke reaffirms and attests to the truthfulness, accuracy, and completeness of her financial statement dated July 20, 2005.

**P** If ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ by the Commission, this Court finds that Pamela Pukke failed to



... shall be taken as true without further proof

**RE DEFECT OR MATRIMONIAL CLASS ACTION SETTLEMENT**

**IT IS FURTHER ORDERED** that the claims settled in this Order shall be distinct and

... Nationalwide Class Action and settled

Action, shall determine the plan for the disbursement of the funds to Ameridebt consumers in the

**VIII. COSTS AND ATTORNEYS FEES**

**IT IS FURTHER ORDERED** that all parties to this Order will bear their own costs and attorneys fees incurred in connection with this action.

**IX. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for all purposes, including construction, modification and enforcement of this Order.

**X. ENTRY OF THIS FINAL JUDGMENT**

**IT IS ORDERED** that there is no just

STIPULATED AND AGREED TO BY:

*Allison I. Brown*

LUCY E. MORRIS

FEDERAL TRADE COMMISSION

ALLISON I. BROWN

JAMIE HINE

FEDERAL TRADE COMMISSION

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Federal Trade Commission

12/28/05 WED 09:35 FAX 202 326 3629

FEDERAL TRADE  
Document 407 Filed 11/03/2006 Page 13 of 15



[Attachment A: Affidavit for Receipt of Final Order]

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I, [redacted], being duly sworn, hereby states and affirms as follows:

[redacted]

[redacted]