





[REDACTED]

Management, Ltd.; Reese Waugh, individually and as an officer, director or agent of the corporate defendants; Jerome Kuebler, individually and as an officer, director or agent of the corporate defendants; Eric Woldoff, individually and as an officer, director or agent of the corporate defendants; George Othon, individually and as an officer, director or agent of the corporate defendants; Jeffrey Garrington, individually and as an officer, director or agent of the corporate defendants; David Kapp, individually and as an officer, director or agent of the corporate defendants; Joshua Rausch, individually and as an officer, director or agent of the corporate defendants; Michael Seng, individually and as an officer, director or agent of the

[REDACTED]

**PROHIBITED BUSINESS PRACTICES**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

at \_\_\_\_\_, is a *de facto* employment when the Defendant knew or should have known that it is

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**III. RIGHT TO REOPEN**

**IT IS FURTHER ORDERED** that within five (5) business days after the date of entry

of this Order, each CAC/CO Defendant shall submit to the Commission a truthful sworn

[REDACTED]

**IV. ACKNOWLEDGMENT OF RECEIPT OF ORDER**

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

**V. DISTRIBUTION OF ORDER BY DEFENDANTS**

**IT IS FURTHER ORDERED** that, for a period of five (5) years from the date of entry of this Order, CAMCO Defendants shall deliver a copy of this Order as directed below.

A. **CAMCO Defendants as control persons:** For any business that any CAMCO Defendant controls, directly or indirectly, or in which any CAMCO Defendant has a majority ownership interest, such Defendant must deliver a copy of this Order to all principals, officers, directors, and managers of that business. CAMCO Defendants must also deliver copies of this Order to all employees, agents, and representatives of that business who engage in conduct related to the subject matter of the Order. For current personnel, delivery shall be within (5) days of service of this Order upon CAMCO Defendants. For new personnel, delivery shall occur prior to them assuming their responsibilities.

control persons. For any business

**VI. COMPLIANCE REPORTING BY DEFENDANTS**

**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:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

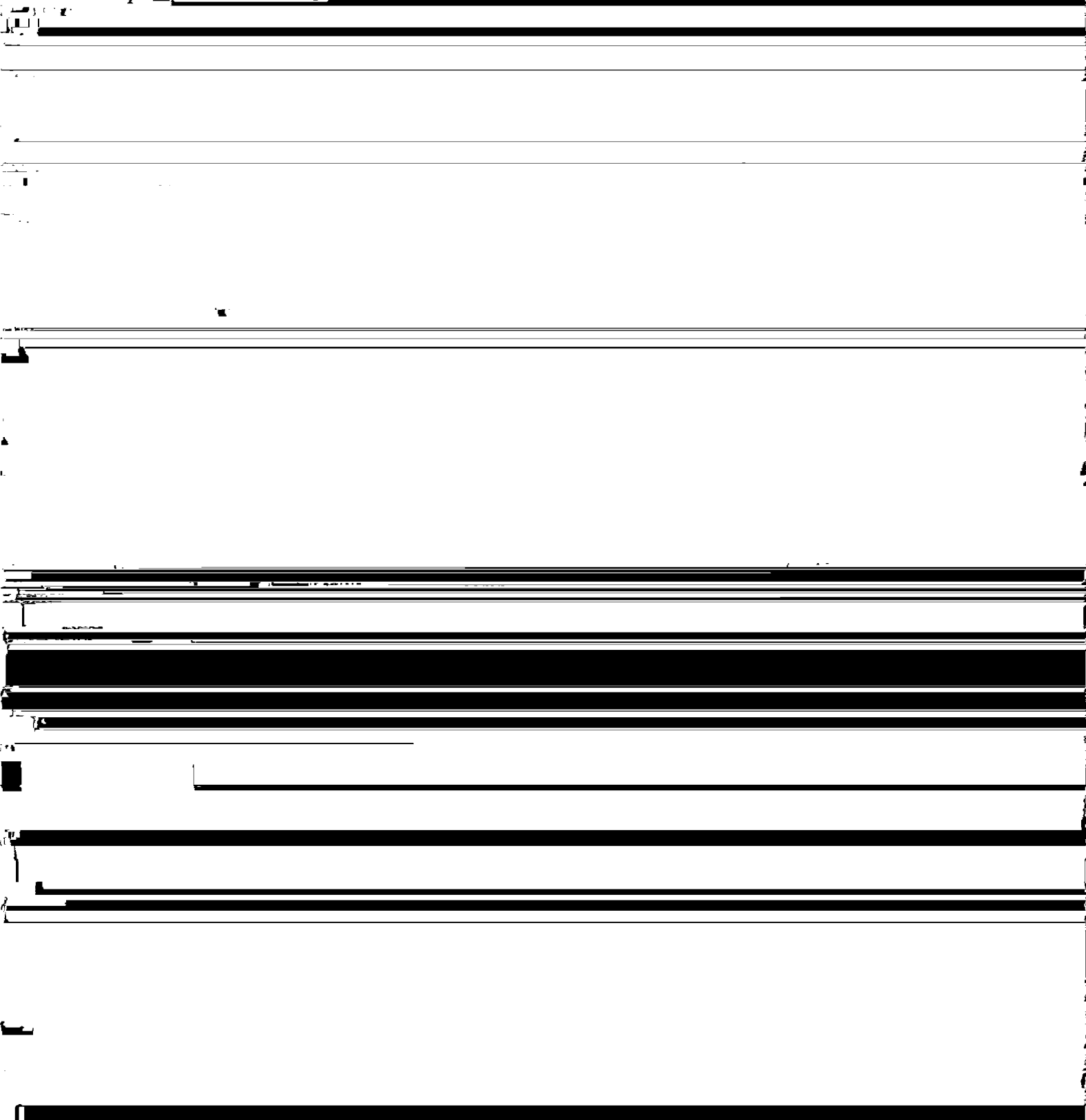
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

receiving and responding to consumer complaints; and (3) ascertaining the number and nature of consumer complaints regarding transactions in which each employee or independent contractor



...the date upon which the person commenced work

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

contained in this Order, and shall permit representatives of the Commission to remove such documents for a period not to exceed ten (10) business days so that the documents may be inspected, inventoried, and copied.





deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C. § 45(a)(1)).

constitutional rights against self-incrimination, and right to counsel. No portion of this Order shall abridge any CAMCO Defendant's constitutional rights.

**XIII. COOPERATION WITH FTC**

**IT IS FURTHER ORDERED** that each CAMCO Defendant shall, in connection with this action or any subsequent investigations related to or associated with the transactions or the occurrences that are the subject of the FTC's Amended Complaint, cooperate in good faith with the FTC and appear at such places and times as the FTC shall reasonably request, after written

**XVII. COMPLETE SETTLEMENT**

The parties hereby consent to entry of the foregoing Order which shall constitute a final

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The parties hereby consent to entry of the foregoing Order which shall constitute a final judgment and order in this matter. The parties further stipulate and agree that the entry of the foregoing Order shall constitute a full, complete, and final settlement of this action.

**So Stipulated:**

[REDACTED]