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4	Hon. Thomas S. Zilly	
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The Commission, by and through its counsel, and Stephen Albert Ironside have consented

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ORDER

PROHIBITED PRACTICES

IT IS THEREFORE ORDERED that defendant is hereby permanently restrained and enjoined from:

- Promoting, offering for sale, or selling, directly or indirectly, tickets, chances, ٨. interests, shares, or registrations in any lottery to any U.S. resident;
- Purchasing or registering any ticket, chance, interest, or share in any lottery for В. any U.S. resident;
- In connection with the advertising, marketing, proposed sale, or sale of any C. product or service to any U.S. resident, misrepresenting or omitting any fact material to a

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disclosing the name, address, telephone number, credit card number, bank account number, email address, or other identifying information of any person who paid any money to any defendant in this matter, at any time prior to entry of this order, in connection with promoting, offerior for ask selling armeniningles in the rate of the art -

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VL.

COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring and investigating compliance with any provision of this Order,

A. Within ten (10) days of receipt of written notice from a representative of the Commission, defendant shall submit additional written reports, sworn to under penalty of perjury, produce documents for inspection and copying; appear for deposition; and/or provide entry during normal business hours to any business location in such defendant's possession or direct or indirect control to inspect the business operation;

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

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VII.

DISTRIBUTION OF ORDER BY DEFENDANT

IT IS FURTHER ORDERED that eight (8) years from the date of entry of this Order, defendant shall deliver copies of the Order as directed below:

A. Defendant as control nerson: For one business that defendant controls discould be

- A. For a period of five (5) years from the date of entry of this Order,
 - Defendant shall notify the Commission of the following:
 - Any changes in defendant's residence, mailing addresses, and
 telephone numbers, within ien (10) days of the date of such
 change;
 - b. Any changes in defendant's employment status (including self-employment) within ten (10) days of the date of such change. Such notice shall include the name and address of each business that defendant is affiliated with, employed by, or performs services for; a statement of the nature of the business; and a statement of defendant's duties and responsibilities in connection with the business; and

Any changes in defendant's name or use of any aliases or fictitions

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Associate Director for Enforcement
Federal Trade Commission
601 New Jersey Ave., NW
Washington, DC 20580

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- C. Customer files containing the names, addresses, phone numbers, dollar amounts paid, quantity of items or services purchased, and description of items or services purchased, to the extent such information is obtained in the ordinary course of business;
- D. Complaints and refund requests (whether received directly, indirectly or through any third party) and any responses to those complaints or requests; and
- E. Copies of all sales scripts, training materials, advertisements, or other marketing materials.
- F. All records and documents necessary to demonstrate full compliance with each provision of this Order, including but not limited to copies of acknowledgments of receipt of this Order, required by Paragraph VII, and all reports submitted to the FTC pursuant to