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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Federal Trade Commission

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[REDACTED]

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[REDACTED]

[REDACTED]

1           silently bundled by both the ERG Defendants and its affiliates causes significant harm to  
2           consumers by downloading programs that: a) change consumer's default homepage;  
3           b) add difficult-to-remove toolbars to the consumer's Internet browsers that display  
4           advertising; c) track the consumer's Internet activity; d) generate repeated and occasionally  
5           annoyingly explicit program advertisements; e) add advertisements to the consumer's Windows

1 utilize post office boxes, a mail forwarding service, and anonymous email addresses that  
2 may have been used to hide from law enforcement and defrauded consumers. (2) the FDG

**DEFINITIONS**

For the purpose of this order, the following definitions shall apply:

1. **“Defendants”** means, individually, collectively or in any combination: ERG Ventures LLC d/b/a ERG Ventures LLC2, Giant Ventures, LLC, Media Motor, IMGiant, ~~Outlookpress.com and PrivateInPublic.com; Elliott S. Cameron d/b/a ERG Ventures~~

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...the ... the installation of all ...

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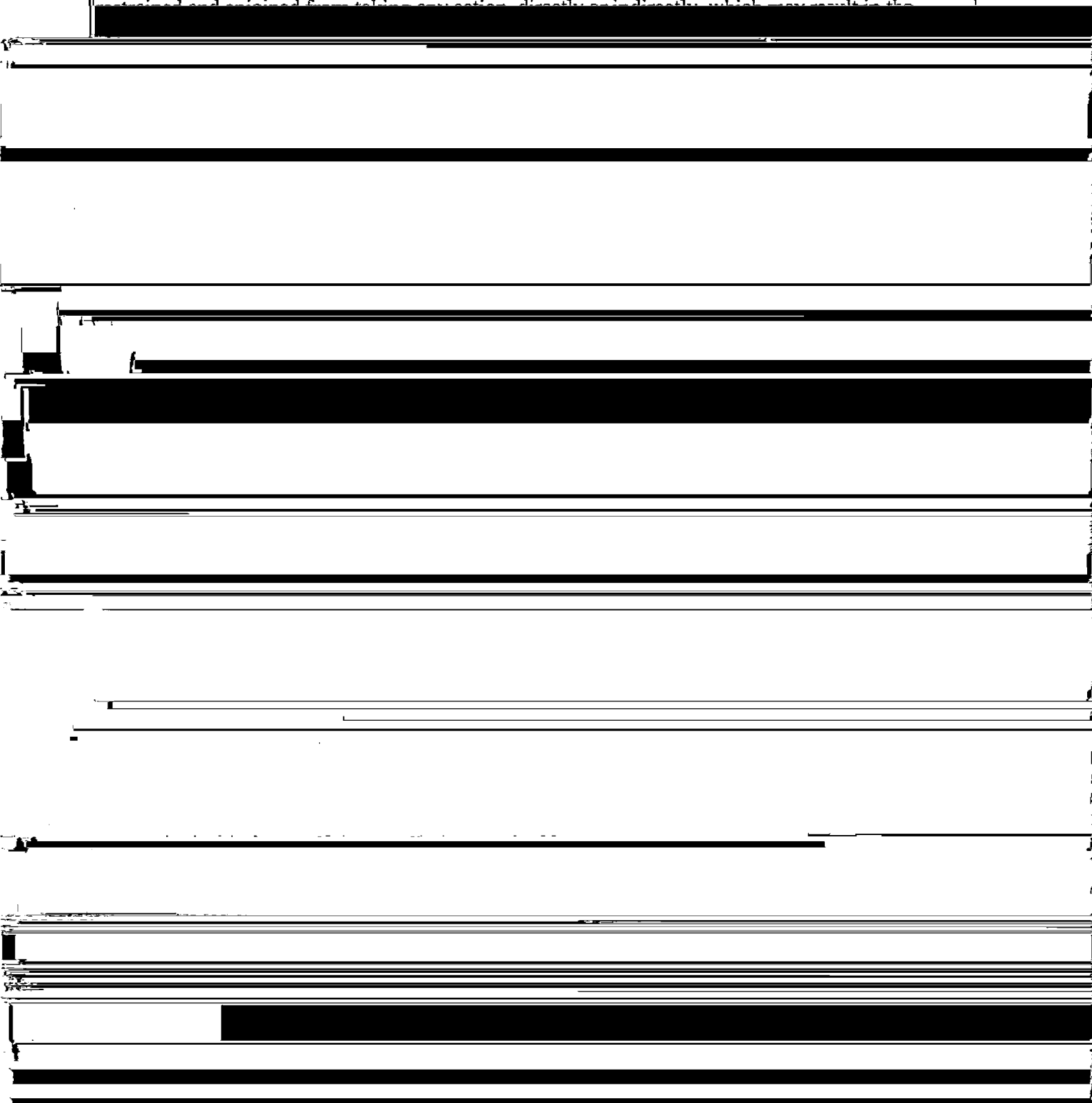
1 ability to seek relief from the Court.

2 *Provided, however,* that the assets affected by this Paragraph shall include: (1) all of the

3 assets of the Corporate Defendants and Individual Defendants existing as of the date this Order

was entered; and (2) for assets obtained after the date this Order was entered, only those assets of

trained and advised from taking possession directly or indirectly, which may result in the



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1 or personal finances of the Defendants, including but not limited to: any and all computer data

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**XII**

**DISTRIBUTION OF ORDER BY DEFENDANTS**

**IT IS FURTHER ORDERED** that the Corporate Defendants and Individual Defendants

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