

The Honorable Ricardo S. Martinez

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UNITED STATES DISTRICT COURT
DISTRICT OF WASHINGTON

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1 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), and the Telemarketing
2 and Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. §§ 6101-6108,
3 charging defendants John Stefanchik, Scott B. Christensen, Justin W. Ely, Beringer Corporation,
4 Atlas Marketing, Inc., and Premier Consulting Group, Inc., doing business collectively as "The
5 Stefanchik Organization," with deceptive acts and practices in connection with the telemarketing
6 of course materials, in-person workshops, videotapes, audio tapes and other educational products
7 and services that purport to teach consumers how to broker, purchase, and/or resell privately-held
8 mortgages or promissory notes that are secured by real estate. The Commission's First Amended

1 4. The alleged activities of defendants Christensen and Atlas are in or affecting
2 commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

3 5. The parties shall each bear their own costs and attorney's fees incurred in this

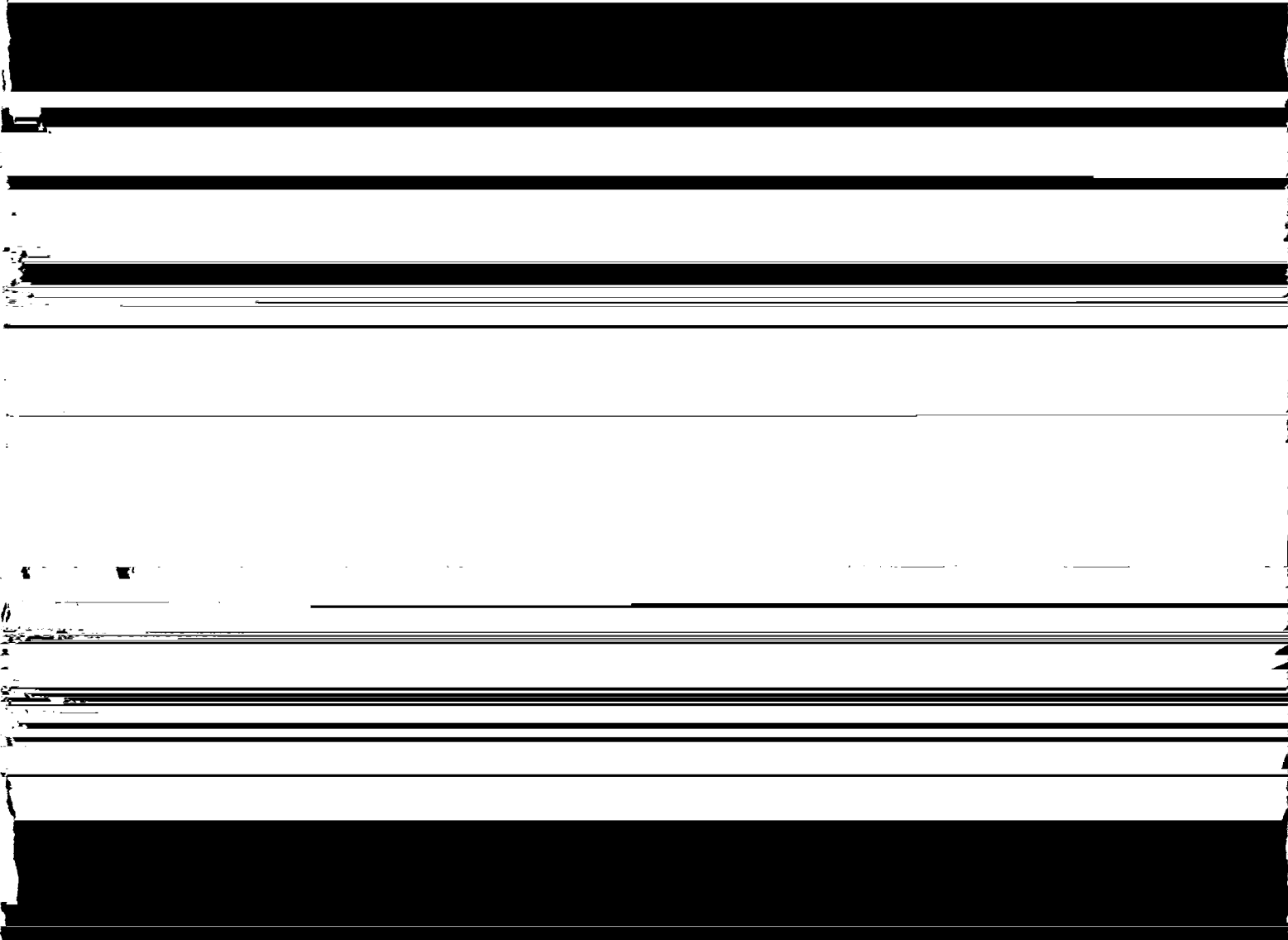
1 4. **“Paper Business”** means the business of brokering the sale of, purchasing, and/or
2 selling privately-held mortgages or promissory notes that are secured by real estate.

3 5. **“Person”** means any individual, group, unincorporated association, limited or

1 D. Misrepresenting, expressly or by implication, any fact material to a consumer's
2 decision to purchase any target product or service; and

11 C Miscellaneous, expressly or by implication, the income, profit, or sales volume

1 permanently restrained and enjoined from selling, renting, leasing, transferring, or otherwise
2 disclosing the name, address, telephone number, credit card number, bank account number, e-mail
3 address or other identifying information of any person who paid any money to any defendant to



1 of collecting and reporting on any delinquent amount arising out of defendants' relationship with
2 the government.

3 D. Defendants agree that the facts as alleged in the First Amended Complaint filed in

[REDACTED]

1 Solely for purposes of this Section, defendants waive any right to contest any of the allegations in
2 the Commission's First Amended Complaint.

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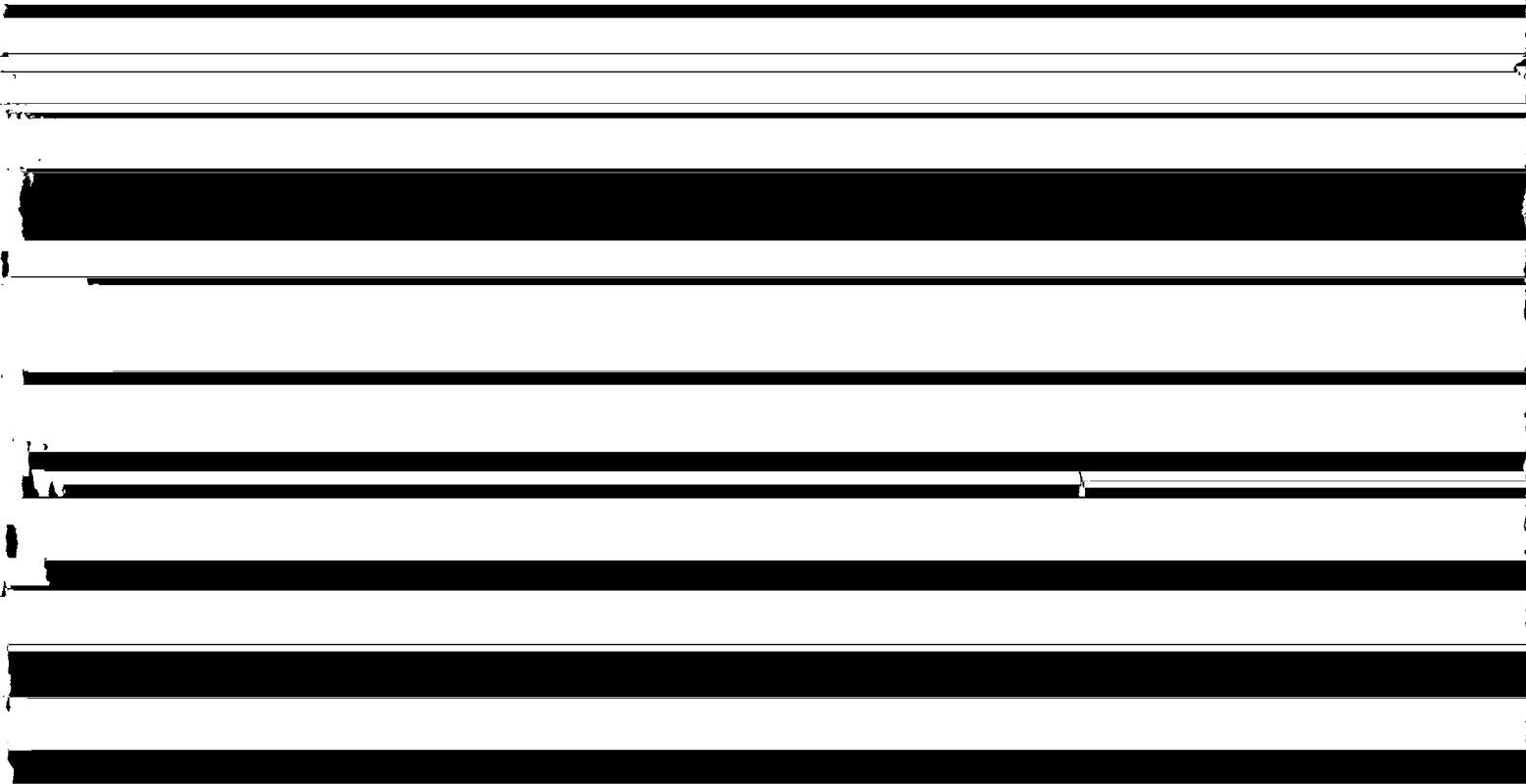
4 **VI. ACKNOWLEDGMENT OF RECEIPT OF JUDGMENT BY DEFENDANTS**

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

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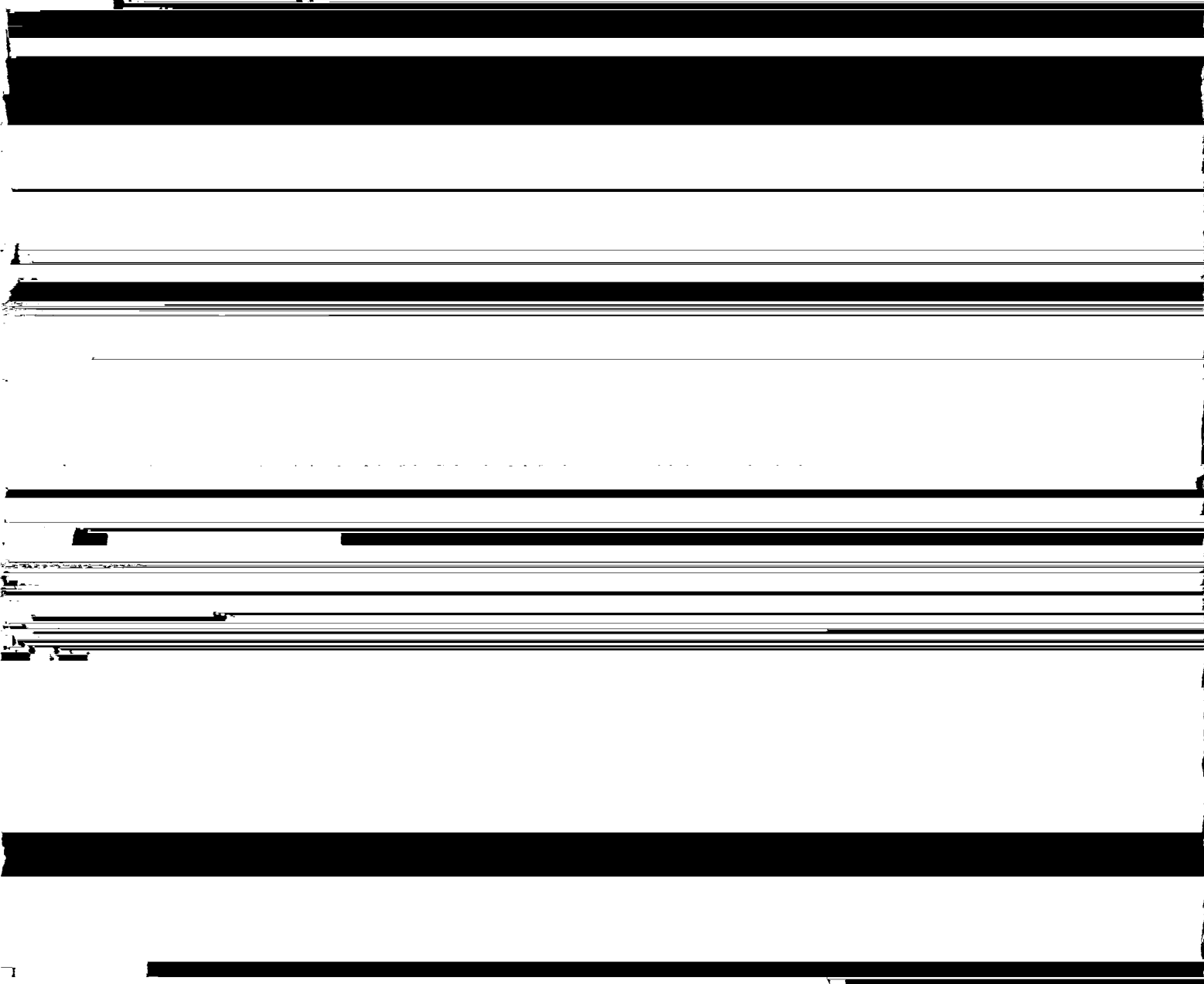
9 **VII. MONITORING COMPLIANCE OF SALES PERSONNEL**

10 **IT IS FURTHER ORDERED** that each defendant, within five (5) business days of receipt of this Stipulated Judgment, shall submit to the Commission a truthful sworn statement acknowledging receipt of this Stipulated Judgment.



1 B. Failing promptly to investigate fully any consumer complaint received by any
2 business to which this Section applies; and

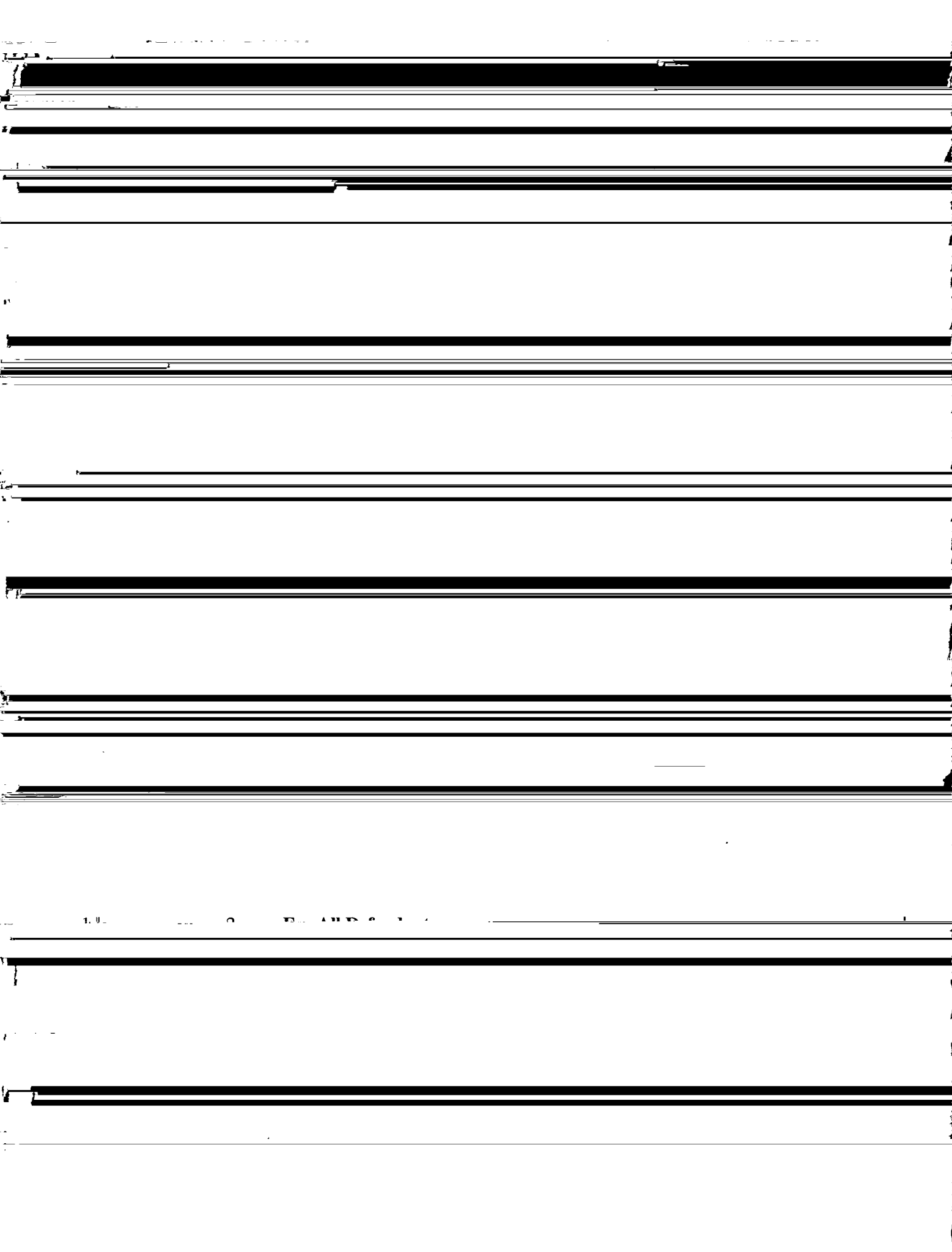
3 C. Failing to take corrective action with respect to any sales person whom defendants



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or any business entity that Scott B. Christensen directly or indirectly controls or has an ownership interest in, that may affect compliance obligations arising under this Stipulated Judgment, including, but not limited to, a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor entity; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or

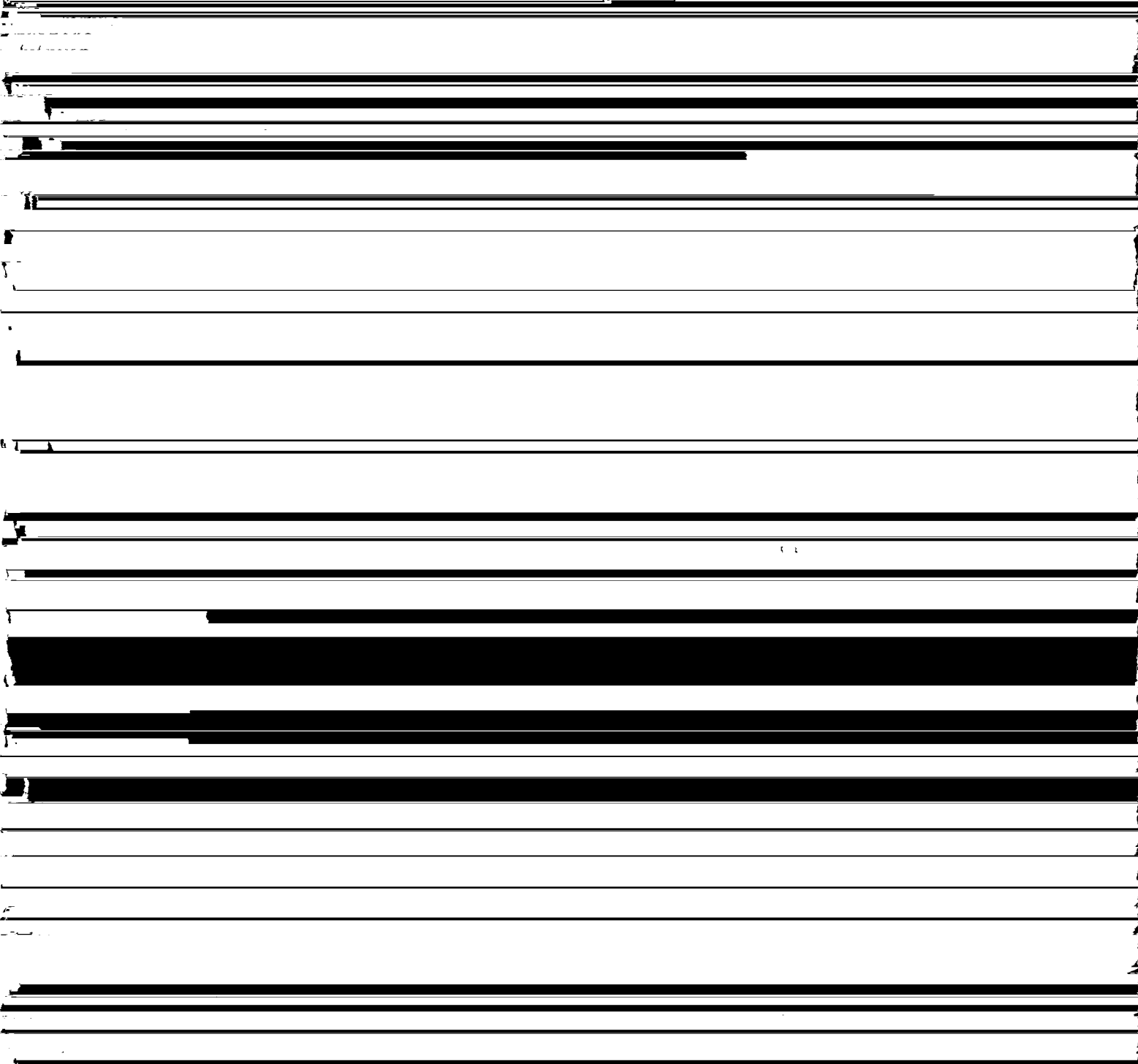
As a result of this Stipulated Judgment, the filing of a bankruptcy



XI. RECORD KEEPING PROVISIONS

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IT IS FURTHER ORDERED that for a period of eight (8) years from the date of entry of this Stipulated Judgment, defendants, and their agents, employees, officers, corporations, successors, and assigns, and those persons in active concert or participation with them who

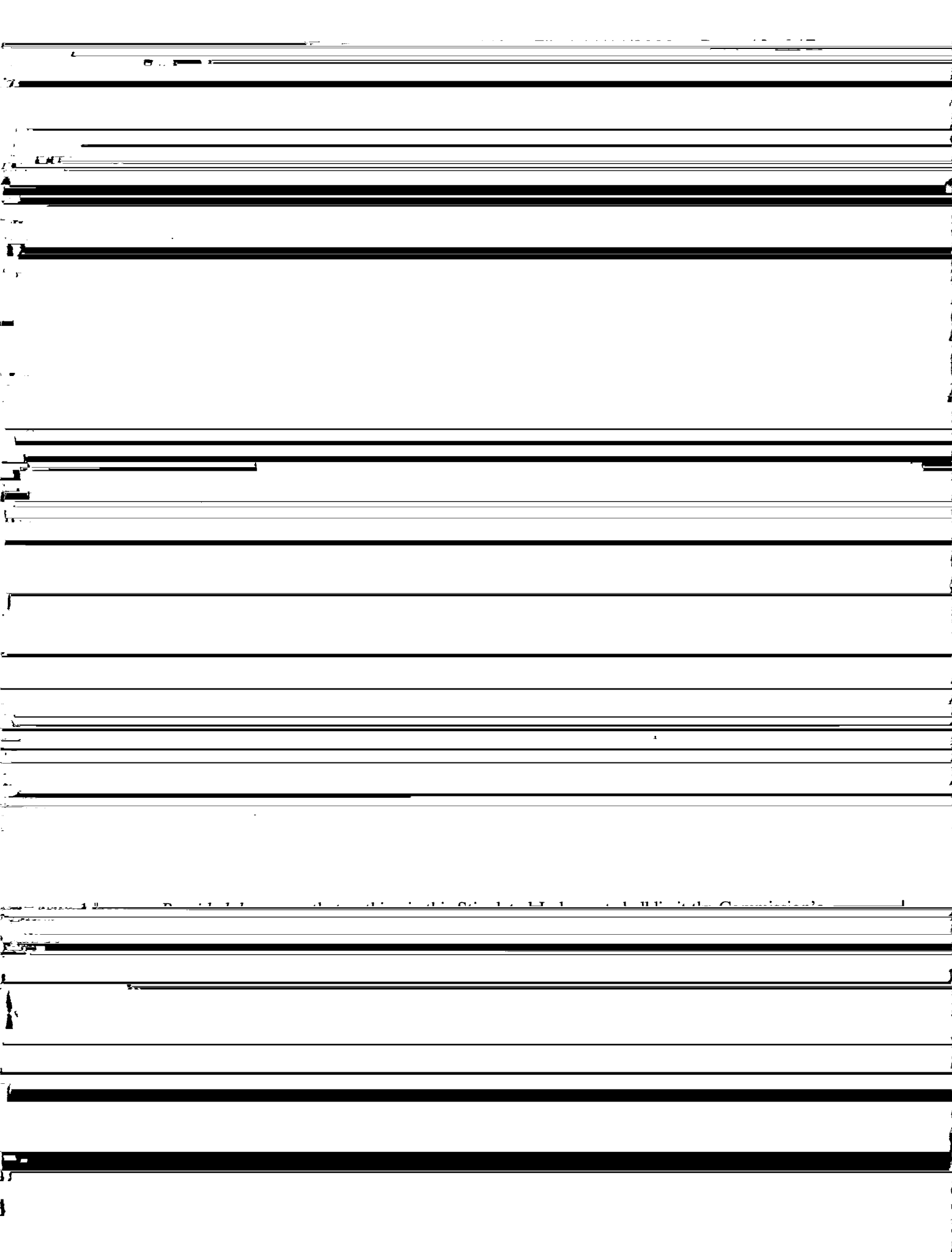


1 F. All records and documents necessary to demonstrate full compliance with each
2 provision of this Stipulated Judgment, including but not limited to, copies of
3 acknowledgments of receipt of this Stipulated Judgment, required by Sections VI
4 and VIII of this Stipulated Judgment, and all reports submitted to the FTC
5 pursuant to Section IX of this Stipulated Judgment.

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7 **XII. COMPLIANCE MONITORING**

8 **IT IS FURTHER ORDERED** that for the purpose of monitoring and investigating
9 compliance with any provision of this Stipulated Judgment,

10 A. Within ten (10) days of receipt of written notice from a representative of the
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1 SCOTT B. CHRISTENSEN,
2 Individually and as an officer of
3 Atlas Marketing, Inc.

4 DEFENDANT

Jodi A. McDougall