

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 involvement with business ventures involving the sale or purchase of discounted
2 or surplus goods. On April 6, 2005, the FTC filed an Amended Complaint adding
3 additional defendants.

4 The Commission and Defendant Jaime Klotthor hereby stipulate to the entry
5 of, and request the Court to enter, this Stipulated Judgment and Order for
6 Permanent Injunction ("Final Order") to resolve all matters of dispute between
7 them in this action.

8 **IT IS THEREFORE STIPULATED, AGREED, AND ORDERED** as
9 follows:

10 1. This Court has jurisdiction over the subject matter of this case and

1 8. Defendant agrees that this Final Order does not entitle Defendant to
2 seek or to obtain attorneys' fees as a prevailing party under the Equal Access to
3 Justice Act, 28 U.S.C. § 2412, as amended by Pub. L. 104-121, 110 Stat. 847, 863.

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[REDACTED]

1 3. "Franchise Rule" means the FTC Trade Regulation Rule entitled
2 "Disclosure Requirements and Prohibitions Concerning Franchising and Business
3 Opportunity Ventures," 16 C.F.R. Part 436, as promulgated or as the Rule may
4 hereinafter be amended or superseded by any future trade regulation rule or rules,
5 in whole or in part;

6 4. "Defendant" means Jaime L. Klotthor, a/k/a Jaime Valentine;

7 5. "Document" is synonymous in meaning and equal in scope to the
8 usage of the term in Fed. R. Civ. P. 34(a), and includes writings, drawings, graphs,
9 charts, photographs, audio and video recordings, computer records, and other data

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D. Serving as an employee, officer, director, trustee, general manager, or

2) consultant, or officer in a position with duties or responsibilities that require

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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4. The income, profits, or sales volume likely to be achieved from the goods or services.

B. Providing substantial assistance to any third party to make any material misrepresentation including but not limited to those misrepresentations

SCANNED

1 **V. ACKNOWLEDGMENT OF RECEIPT OF ORDER**

2 **IT IS FURTHER ORDERED** that, within ten (10) business days of receipt
3 of this Final Order as entered by the Court, Defendant must submit to the
4 Commission a truthful sworn statement acknowledging receipt of this Final Order.

5 **VI. DISTRIBUTION OF ORDER BY DEFENDANT**

6 **IT IS FURTHER ORDERED** that, for a period of three (3) years from the

SCANNED

1 B. One hundred and eighty (180) days after the date of entry of this Final

2 Order and each year thereafter on the same date through and including each Jan

[REDACTED]

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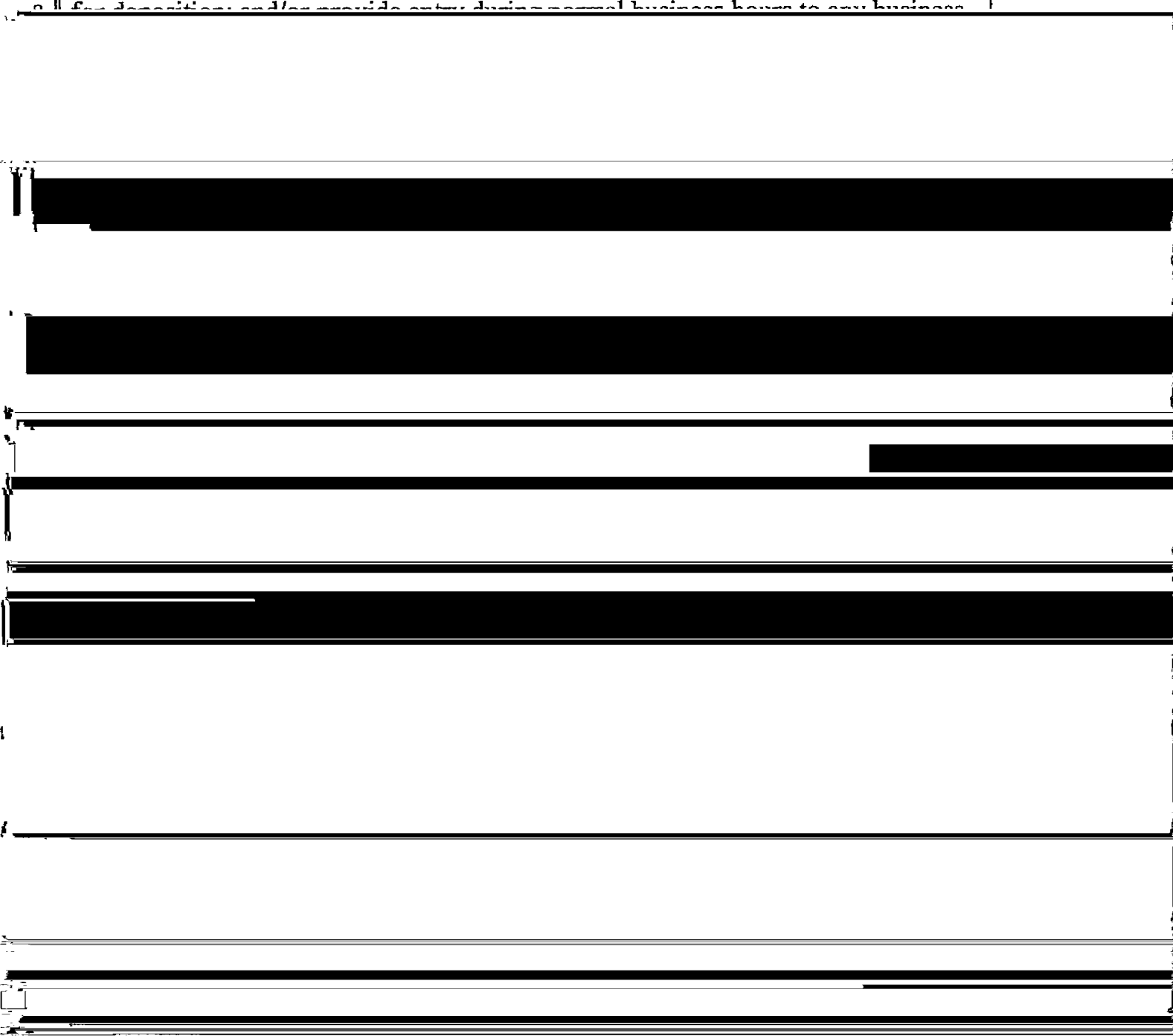
[REDACTED]

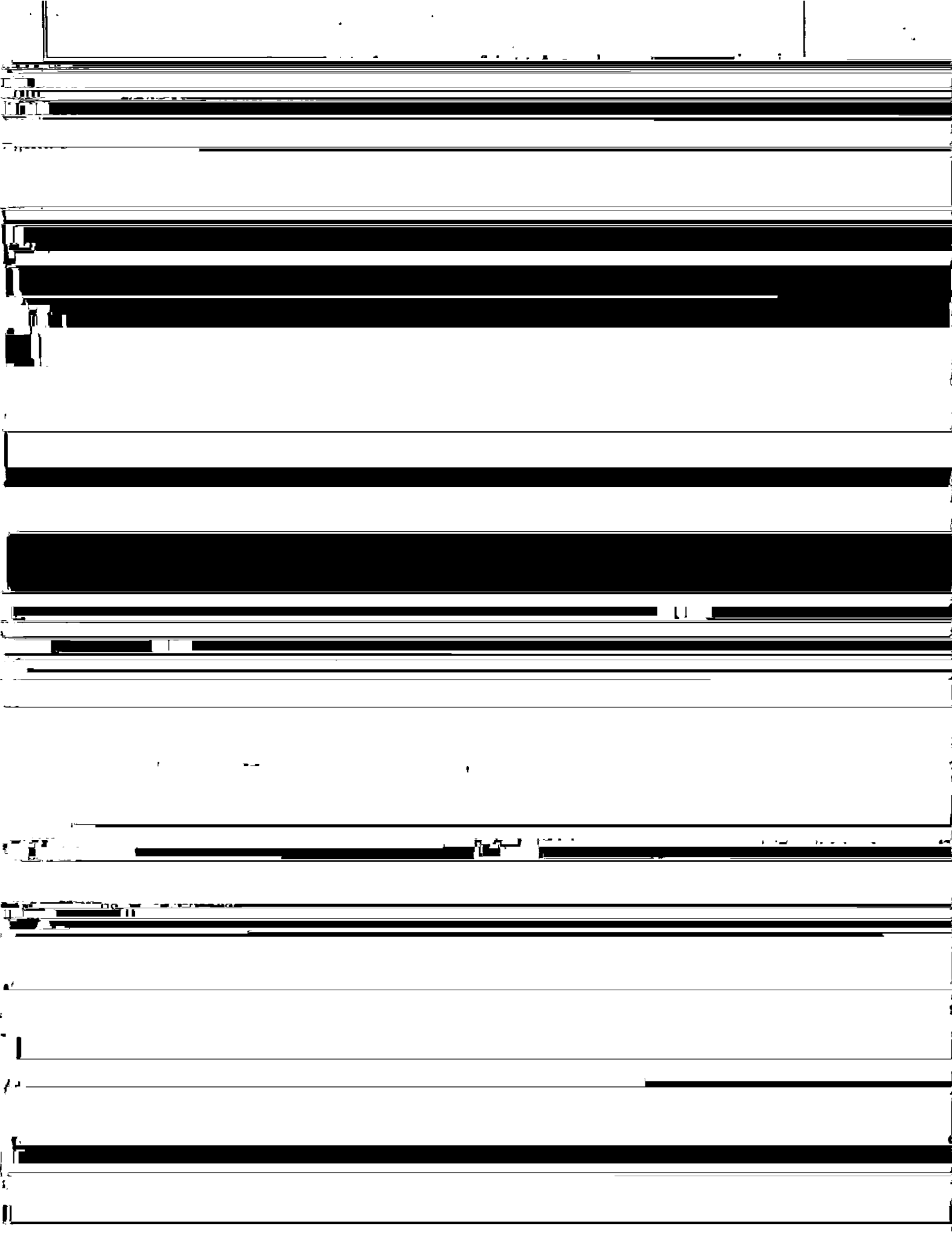
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2 **IX. COMPLIANCE MONITORING**

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

5 A. Within ten (10) days of receipt of written notice from a representative
6 of the Commission, Defendant shall submit additional written reports, sworn to
7 under penalty of perjury; produce documents for inspection and copying; appear

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1 **XIII. RETENTION OF JURISDICTION**

2 **IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of
3 this matter for purposes of construction, modification and enforcement of this
4 Final Order.

5 **XIV. ENTRY OF ORDER**

6 **IT IS FURTHER ORDERED** that there is no just reason for delay and the

SCANNED

1 **STIPULATED BY:**

2 **FOR THE DEFENDANT:**

3

[REDACTED]

[REDACTED]

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[REDACTED]

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