

1 releases any claim she may have against the Commission, its employees,
2 representatives, or agents.

3 8. Defendant agrees that this Final Order does not entitle Defendant to
4 seek or to obtain attorneys' fees as a prevailing party under the Equal Access to

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5 U.S.C. § 2412, as amended by Pub. L. 104-121, 110 Stat. 847-863.

1 new business or the entry by an existing business into a new line or type of
2 business;

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6 hereinafter be amended or superseded by any future trade regulation rule or rules

SCANNED

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

1 III. MONETARY JUDGMENT

2 IT IS FURTHER ORDERED that:

3 A. Defendant is liable to the Commission for twelve million seventy-five
4 thousand five hundred seventy-two dollars (\$12,075,572), and the FTC is awarded
5 a monetary judgment in this amount; *provided, however*, that payment of this
6 judgment shall be suspended and that the freeze of Defendant's assets shall be

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1 financial condition, then the Court shall lift any suspension of the judgment and

[REDACTED]

[REDACTED]

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2. The then-current employment and business addresses and telephone numbers of Defendant, a description of the business activities of each

_____ and responsibilities of the Defendant for

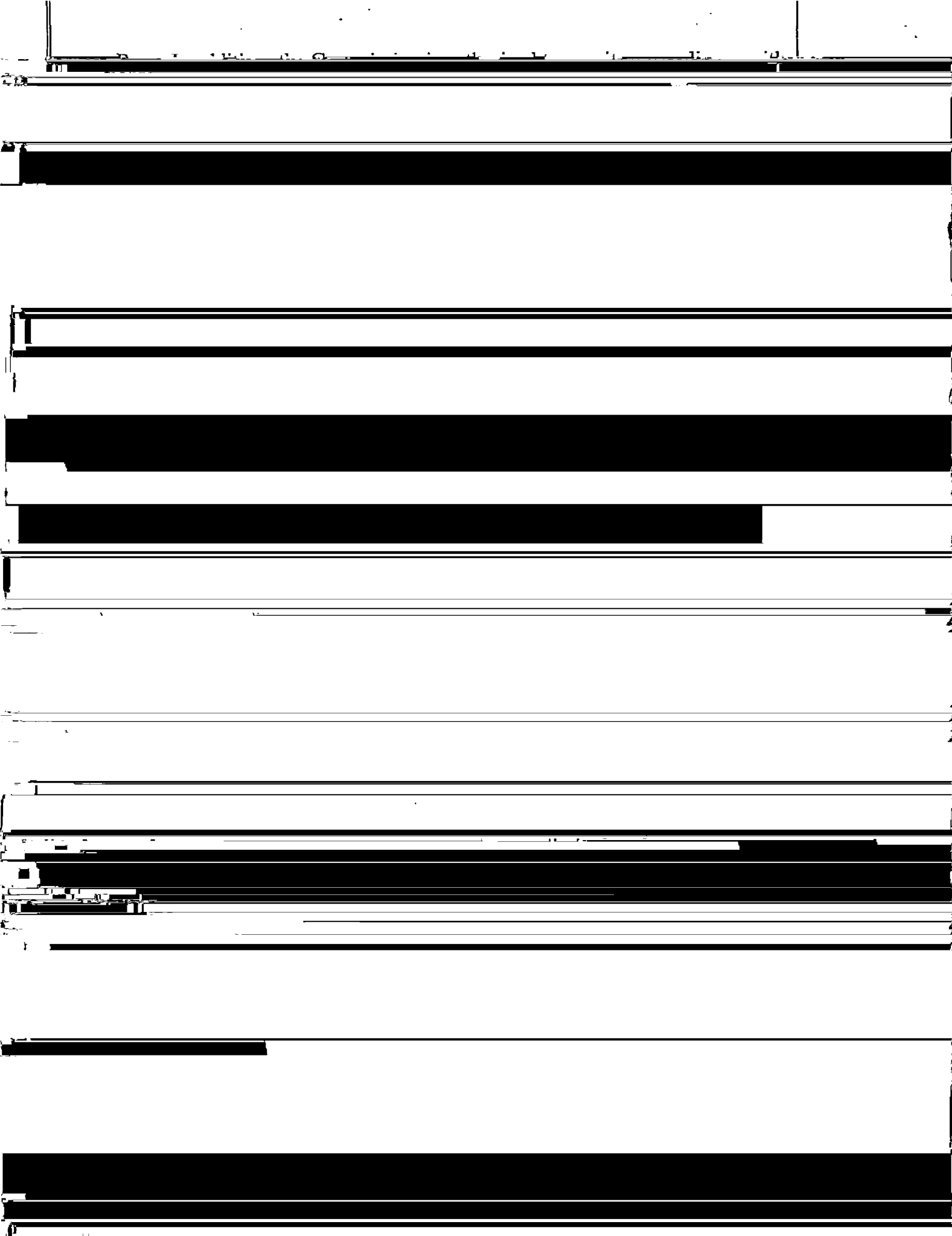
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[REDACTED]

1 A. Accounting records that reflect the cost of goods or services sold,
2 revenues generated, and the disbursement of such revenues;

3 B. Personnel records accurately reflecting: the name, address, and

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1 marketing, offering for sale, or sale of any good or service; *provided, however,*
2 that Defendant may disclose such identifying information to a law enforcement

XV. COMPLETE SETTLEMENT

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The parties hereby consent to entry of the this Final Order which shall

CONFIDENTIAL

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STIPULATED BY:

FOR THE PLAINTIFF

FOR THE DEFENDANT

William Blumenthal
General Counsel

David R. Spiegel Date: 2/14/07
David R. Spiegel (N.Y. Bar #1592724)
Attorney for Plaintiff
Federal Trade Commission

Jennifer Klotthor Date: 11/30/04
Jennifer Klotthor
6533 Day Street
Tujunga, CA 91042

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