

ORIGINAL

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CLERK, U.S. DISTRICT COURT

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1           5.     Defendant has entered into this Order freely and without coercion.

2     Defendant further acknowledges that he has read the provisions of this Order and is

3     willing to abide by them.

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1 deliveries, inventory, checks, notes, accounts, credits, contracts, receivables, shares  
2 of stock, and all cash, wherever located.

3 2. **"Billing information"** means any data that enables any person to access  
4 a customer's or donor's account, such as a credit card, checking, savings, share or  
5 similar account, utility bill, mortgage loan account, or debit card.

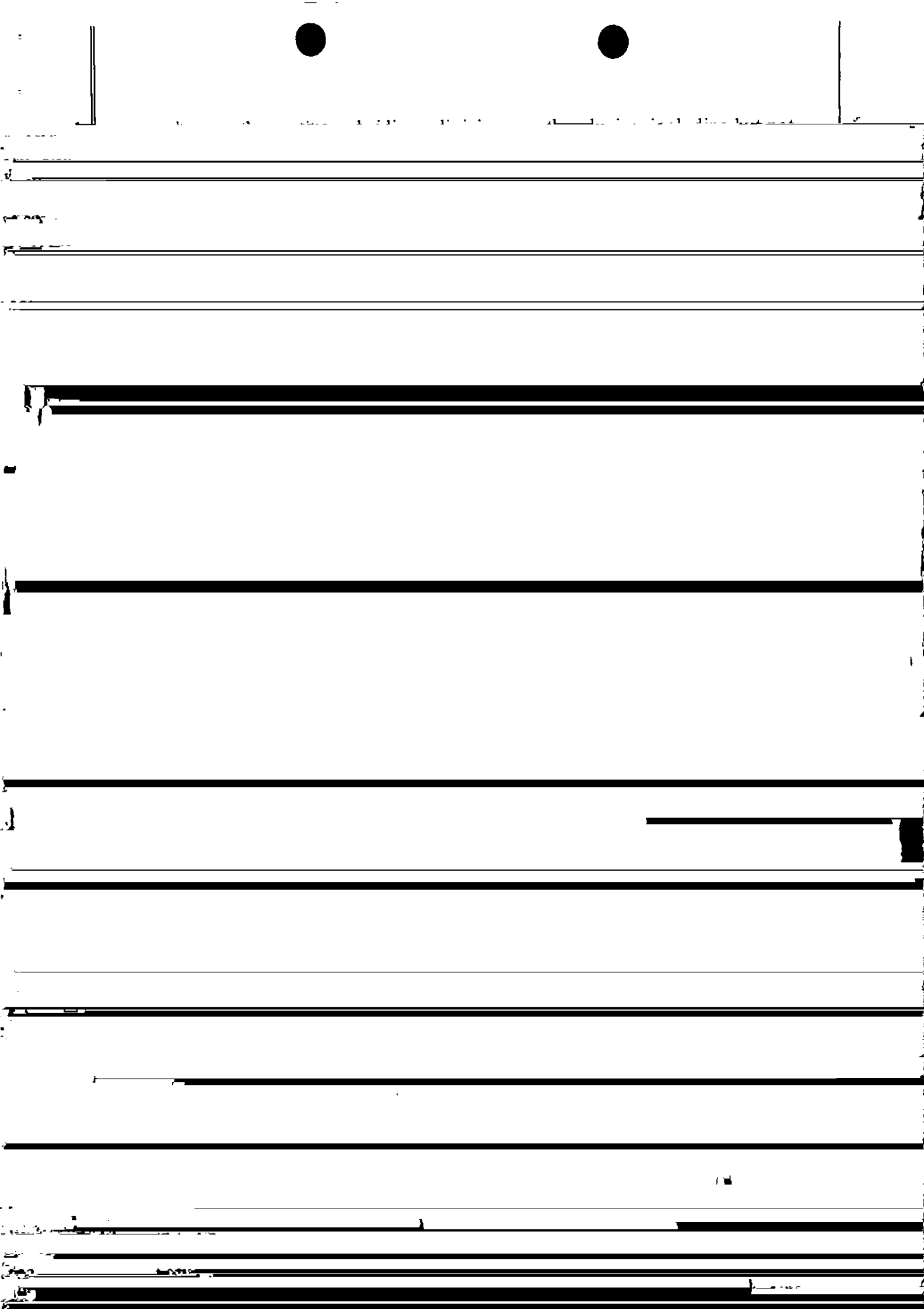
6 3. Unless otherwise specified, **"Corporate Defendants"** means Universal  
7 Premium Services, Inc. (also known as Premier Benefits, Inc.); Consumer Reward  
8 Network, Inc. (also known as Best Buy Alliance, Inc.); Star Communications LLC;  
9 Membership Services Direct, Inc. (also known as Continuity Partners, Inc.);  
10 Connect2USA, Inc.; Merchant Risk Management, Inc.; Pantel One Corporation; All  
11 Star Access, Inc.; and Prime Time Ventures, Inc.

12 4. **"Customer"** means any person who is or may be required to pay for

1 failure to take an affirmative action to reject goods or services or to cancel the  
2 agreement is interpreted by the seller as acceptance of the offer.

3 10. "Person" means any individual, group, unincorporated association,

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1 . A. obtains from the customer, at a minimum, the last four (4) digits of the  
2 account number to be charged;

3 B. obtains from the customer his or her express agreement to be charged  
4 for the goods or services and to be charged using the account number referenced in  
5 subsection II.A of this Order; and

6 C. makes and maintains an audio recording of the entire telemarketing  
7 transaction.

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**III.  
Prohibition Against Violating Telemarketing Sales Rule**

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IF A NUMBER ORDER IS \_\_\_\_\_



D using threats, intimidation, or profane or obscene language in a



1 value of any asset. Defendant relinquishes to the FTC all right and claim to the



1 F. Defendant is further required, unless he has done so already, to provide  
2 the Commission with clear, legible and full-size photocopies of all valid driver's  
3 licenses that he possesses, which will be used for reporting and compliance purposes.

4 G. Defendant agrees that the facts as alleged in the First Amended  
5 Complaint filed in this action shall be taken as true in any subsequent litigation filed  
6 by the Commission to enforce its rights pursuant to this Order, including, but not  
7 limited to a non-dischargeability complaint filed in any bankruptcy proceeding.

8 H. Proceedings instituted under this Section are in addition to, and not in

1 alleged in the First Amended Complaint. Any funds not used for such equitable  
2 relief shall be deposited to the United States Treasury as disgorgement. Defendant  
3 shall have no right to challenge the Commission's choice of remedies under this  
4 Section.

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**VI.**  
**Lifting of the Asset Freeze**

1 against the Receiver, the Receivership estate, or the Receivership Defendants by  
2 other persons or entities; (C) executing any documents that he has the power to  
3 execute necessary to transfer assets or ownership interests to the Receiver pursuant

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

IX.  
**Acknowledgment and Receipt of Order**

IT IS FURTHER ORDERED that Defendant, within five (5) business days of

receipt of this Order as entered by the Court, shall execute and submit to the

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1 may enable the FTC to contact such person(s) and verify his or her receipt of this  
2 Order.

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**XI.  
Compliance Reporting**

IT IS FURTHER ORDERED that, in order that compliance with the

1 learns less than thirty (30) days prior to the date such action is to take place,  
2 Defendant shall notify the Commission as soon as is practicable after obtaining such  
3 knowledge.

4 B. One hundred eighty (180) days after the date of entry of this Order,  
5 Defendant shall provide a written report to the Commission, sworn to under penalty  
6 of perjury, setting forth in detail the manner and form in which he has complied and  
7 is complying with this Order. This report shall include, but not be limited to:

8 1. The then-current residence addresses, mailing addresses, and  
9 telephone numbers of Defendant;

10 2. The then-current employment and business addresses and

11 a description of the business activities of each such



D. For the purposes of compliance reporting and monitoring required by this Order, the Commission is authorized to communicate directly with Defendant unless the Defendant has notified the Commission that he is represented by counsel.

**XII.  
Compliance Monitoring**

IT IS FURTHER ORDERED that, for the purposes of monitoring and

compliance with any provision of this Order.

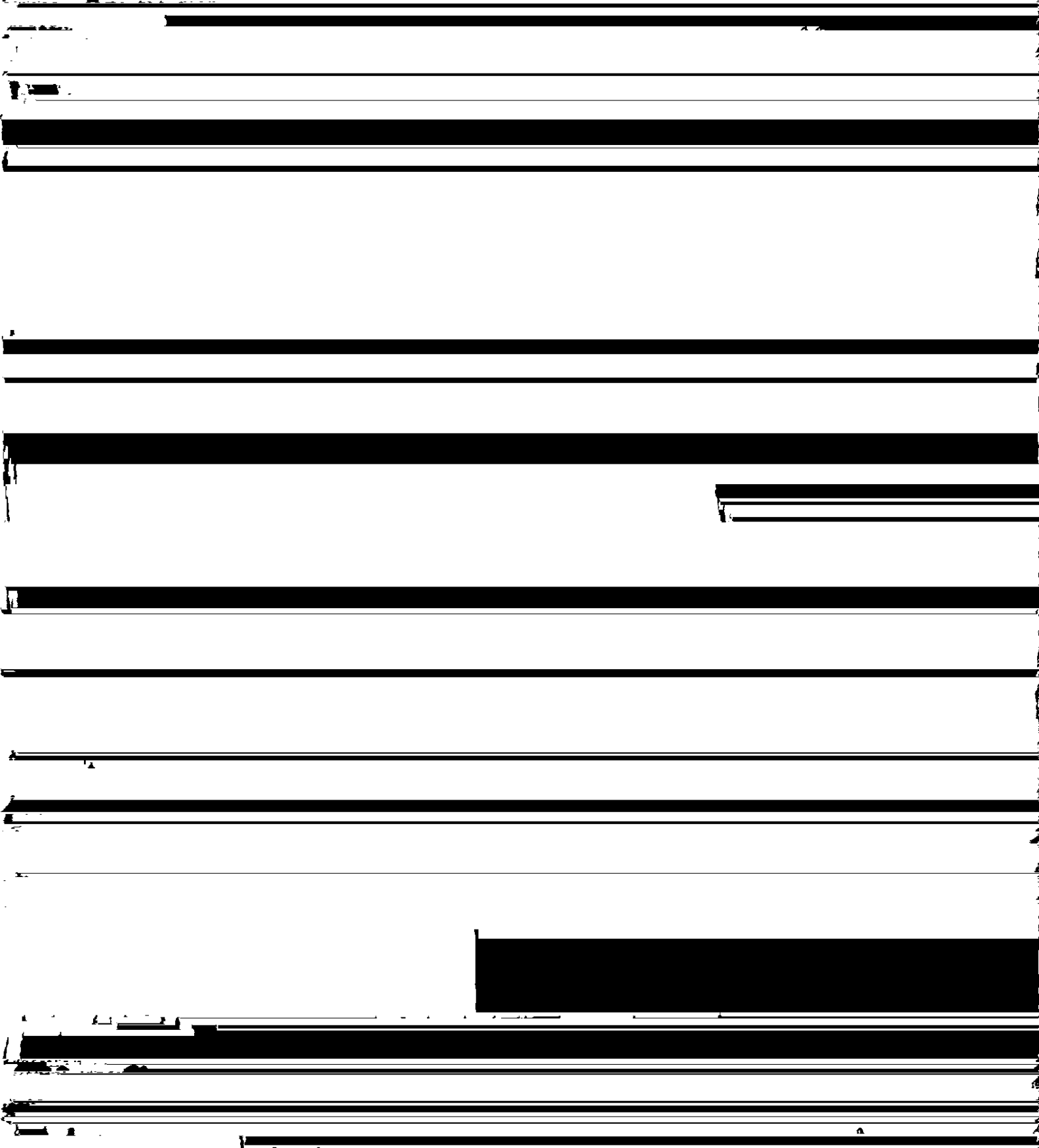
1 U.S.C. §§ 49, 57b-1, to obtain any documentary material, tangible things, testimony,  
2 or information relevant to unfair or deceptive acts or practices in or affecting  
3 commerce (within the meaning of 15 U.S.C. § 45(a)(1)).

4  
5 **XIII.**  
**Record Keeping Provisions**

6 ~~THIS IS A DRAFT COPY OF THE ORDER. IT IS SUBJECT TO CHANGE WITHOUT NOTICE.~~

1 E. Copies of all promotional materials, sales scripts, training materials,  
2 websites, or other marketing materials;

3 F. Copies of all contracts entered into with third-party service providers;  
4 and



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**XVIII.  
Complete Settlement**

The parties hereby consent to entry of this Order which shall constitute a final

of this case in this matter. The parties further stipulate and agree that they

[REDACTED]

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**XVIII.  
Complete Settlement**

The parties hereby consent to entry of this Order which shall constitute a final judgment and order in this matter. The parties further stipulate and agree that the entry of this Order shall constitute a full, complete, and final settlement of this action.

**SO STIPULATED:**

Dated: 12/21/06



Dated: January 29, 2007



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APPENDIX A

1 FAYE CHEN BARNOUW, Cal. Bar No. 168631  
JENNIFER M. BRENNAN, Cal. Bar No. 225472

*APPENDIX A*

1 After consideration of the evidence presented by the Commission in its Motion  
2 to Impose Suspended Judgment and the Response, if any, of Defendant Pranot  
3 Sangprasit thereto:

4 IT IS ORDERED that Defendant Pranot Sangprasit is liable for, and shall pay

DECLINED





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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\*\*\* THIS SECTION IS CURRENT THROUGH THE OCTOBER 12, 2006 ISSUE OF \*\*\*  
\*\*\* THE FEDERAL REGISTER \*\*\*

TITLE 16 -- COMMERCIAL PRACTICES  
CHAPTER I -- FEDERAL TRADE COMMISSION

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PART 310 -- TELEMARKETING SALES RULE

§ 310.1 Scope of regulations in this part.

This part implements the Telemarketing and Consumer Fraud and Abuse Prevention Act, 15 U.S.C. 6101-6108, as



[The page contains multiple lines of text that have been completely redacted with black bars.]

HISTORY: [60 FR 43842, 43864, Aug. 23, 1995; 68 FR 4580, 4669, Jan. 29, 2003]

AUTHORITY: AUTHORITY NOTE APPLICABLE TO ENTIRE PART: 15 U.S.C. 6101-6108.

NOTES: [EFFECTIVE DATE NOTE: 68 FR 4580, 4669, Jan. 29, 2003, revised Part 310, effective Mar. 31, 2003.]

**§ 310.3 Deceptive telemarketing acts or practices.**

(a) Prohibited deceptive telemarketing acts or practices. It is a deceptive telemarketing act or practice and a violation of this Rule for any seller or telemarketer to engage in the following conduct:

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[REDACTED]

(viii) That any customer needs offered goods or services to provide protections a customer already has pursuant to 15 U.S.C. 1643; or

(ix) Any material aspect of a negative option feature including, but not limited to, the fact that the customer's account will be charged unless the customer takes an affirmative action to avoid the charge(s), the date(s) the charge(s) will be

[REDACTED]

(3) A person to obtain access to the credit card system through the use of a business relationship or an affiliation with

(B) obtain from the customer his or her express agreement to be charged for the goods or services and to be charged

using the account number pursuant to paragraph (a)(6)(i)(A) of this section; and,

(C) make and maintain an audio recording of the entire telemarketing transaction.

(D) In any telemarketing transaction involving processed account information not described in paragraph (a)(6)(i)(A)

(iv) The seller or a telemarketer uses a process to prevent telemarketing to any telephone number on any list established



4, 2003, provides "The Commission will require full compliance with § 310.4(b)(1)(iv) and § 310.4(b)(4) on October 1,

**§ 310.5 Recordkeeping requirements.**

(a) Any seller or telemarketer shall keep, for a period of 24 months from the date the record is produced, the following records relating to its telemarketing activities:

- (1) All substantially different advertising, brochures, telemarketing scripts, and promotional materials;
- (2) The name and last known address of each prize recipient and the prize awarded for prizes that are represented, directly or by implication, to have a value of \$ 25.00 or more;

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organization, provided, however, that this exemption does not apply to the requirements of § 310.4(a)(1), (a)(7), (b), and (c);

(4) Telephone calls initiated by a customer or donor that are not the result of any solicitation by a seller, charitable organization, or telemarketer, provided, however, that this exemption does not apply to any instances of upselling included in

[REDACTED]

(c) The annual fee, which must be paid by any person prior to obtaining access to the National Do Not Call Registry, is \$ [REDACTED] of data accessed, up to a maximum of \$ 17,050; provided, however, that there shall be no charge for the first [REDACTED]