

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 07-cv-00558-RPM
FEDERAL TRADE COMMISSION,

UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

JAN 31 2008

v.

DEBT-SET, a Nevada corporation;
RESOLVE CREDIT COUNSELING, INC., a Colorado corporation;
WILLIAM RIGGS, individually and as an officer or director of Debt-Set;
MICHELLE TUCKER, a/k/a Michelle Mangan, individually and as an officer or director of

Tucker (collectively, "Settling Defendants"), by and through their respective counsel, have agreed to entry of this Stipulated Final Judgment and Order for Permanent Injunction and Other

Available Relief ("Order") by this Court with the following terms and conditions:

[REDACTED]

of entry of this Order, and request jointly pursuant to Federal Rule of Civil Procedure 54(b) that the Court enter final judgment with respect to Settling Defendants as set forth herein;

6. Settling Defendants waive and release: All rights to seek appellate

review or otherwise challenge or contest the validity of this Order, all rights to

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. "Document" is synonymous in meaning and equal in scope to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and other data compilations from which information can be obtained and translated, if necessary, through detection devices into

conditions apply. Ask for details."

if any communication is presented orally through oral written communication."

means, the message shall be made through the same means; and

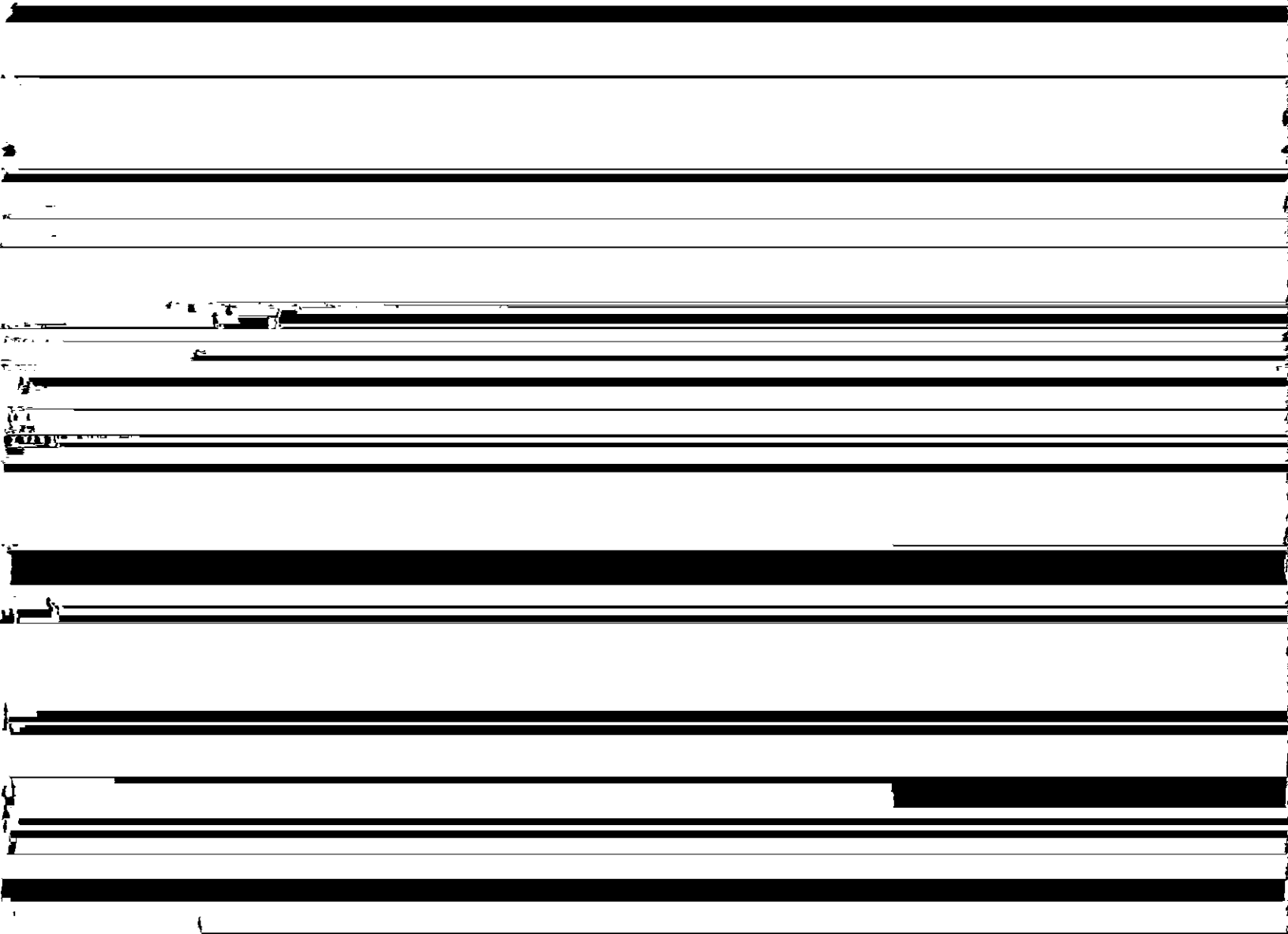
e. regardless of the medium used to disseminate it, the message shall be in understandable language and syntax. Nothing contrary to, inconsistent with, or in mitigation of the message shall be used in any communication.

6. "Enrolling" means the submission of payment by consumers to Settling Defendants or their successors, assigns, officers, agents, servants, employees, and attorneys, or any person

1. a specific reduction or specific range of reductions of consumers' interest rates, including to "between zero and nine percent;" or

2. any specific percentage of reduction, range of percentages, or words to the equivalent effect of a specific percentage, including terms such as "fifty cents on the dollar," of the consumer's total amount of unsecured debt owed at the time the consumer enrolls in the program/services;

B. ~~Misrepresenting~~ or assisting others in misrepresenting expressly or by



- a. all fees and costs that will be charged for these services, including when and how such fees and costs will be paid by consumers;
- b. the approximate time period before settlements will be achieved on behalf of consumers, based on the prior historical experience of the average consumer who enrolls in a Debt Reduction Program or Service; and
- c. that consumers' balances will typically increase during this time period until settlements for all accounts are actually achieved.

II. COOPERATION WITH FTC COUNSEL

IT IS FURTHER ORDERED that each Settling Defendant shall, in connection with this action or any subsequent investigations related to or associated with the transactions or the

In Reply, please refer to the captioned case and file with the Court.

shall have no right to challenge the Commission's choice of remedies under this Section:

less than the full amount of the judgment, is expressly premised upon the truthfulness, accuracy and completeness of each Settling Defendant's financial condition, as represented in each Settling Defendant's sworn financial statement, the attachments thereto, and deposition testimony and compliance with Paragraphs A.1. through A.3. of this Section. The financial statements contain material information upon which the FTC relied in negotiating and agreeing to this Order. If, upon motion by the FTC, this Court finds that any Settling Defendant failed to

[REDACTED]

Decided, however, that nothing in this Order shall limit the Commission's

alternative names; and

2. Each Settling Defendant shall notify the Commission of any changes in

corporate structure of Debt-Set or any business entity that William D. [redacted] or Leo M. [redacted]

3. Any other changes required to be reported under subparagraph A of this Section; and

4. A copy of each acknowledgment of receipt of this Order, obtained pursuant to Section VIII.

C. For purposes of this Order, each Settling Defendant shall, unless otherwise directed by the Commission's authorized representatives, mail all written notifications to the

Commission to: Associate Director for Enforcement
Federal Trade Commission

B. Personnel records accurately reflecting: the name, address, and telephone number of each person employed in any capacity by such business, including as an independent contractor; that person's job title or position; the date upon which the person commenced work; and the date and reason for the person's termination.

responsibilities.

B. For any business that is engaged in the promotion or sale of Debt Reduction Programs or Services that Defendant William Riggs or Leo Mangan controls, directly or indirectly, or in which Defendant William Riggs or Leo Mangan has a material interest,

interest they must deliver a copy of this Order to all principals, officers, directors, and managers

X. PROHIBITION ON DISTRIBUTION OF CUSTOMER LISTS

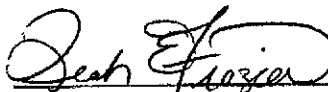
IT IS FURTHER ORDERED that each Settling Defendant, and their agents, servants,

~~employees, and attorneys and all other persons assisting in such~~

[REDACTED]

SO STIPULATED:

FOR PLAINTIFF, FEDERAL TRADE COMMISSION:



Peter Lambertson

Sara Gottovi

Leah Frazier

Federal Trade Commission

600 Pennsylvania Avenue, NW, Mail Drop NJ-3158

Washington, DC 20580

Telephone: (202) 326- 3274, 3201, 2187

Facsimile: (202) 326-3768



Peter Lambertson
Sara Gottovi
Leah Frazier
Federal Trade Commission
600 Pennsylvania Avenue, NW, Mail Drop NJ-3158
Washington, DC 20580
Telephone: (202) 326- 3274, 3201, 2187
Facsimile: (202) 326- 3750