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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff

v.

Case No. CV 07-3654 GW FMOx

**STIPULATED FINAL ORDER  
FOR PERMANENT INJUNCTION  
AND OTHER EQUITABLE RELIEF  
AGAINST DEFENDANT SCOTT**

[Redacted]

of opportunities to cooperate on line 31-2-1

[Redacted]

[Redacted]

[Redacted]

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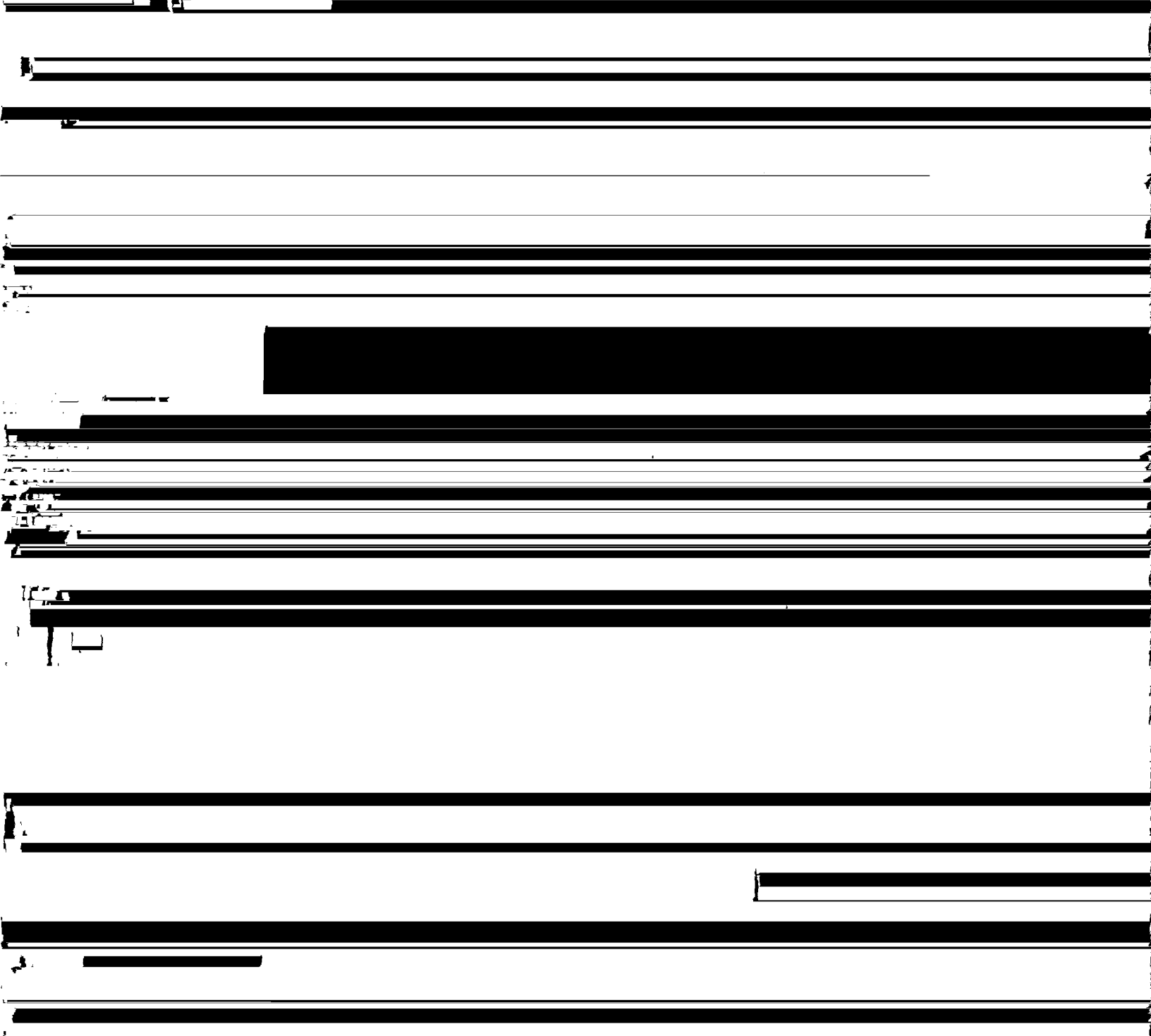
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**DEFINITIONS**

For purposes of this Order, the following definitions shall apply:

1. "Business Venture" means any written or oral business arrangement, however denominated, whether or not covered by 16 C.F.R. Parts 436 or 437, that consists of the payment of any consideration for (i) the right or means to offer, sell, or distribute goods or services (whether or not identified by a trademark, service



1 grouping: (2) sell goods or services; and (3) receive payment or other

1 promotion, offering for sale, or sale of any Multi-level Marketing Program or  
2 Business Venture, Defendant Elliott and his agents, servants, employees, and  
3 attorneys, and those persons in active concert or participation with him who  
4 receive actual notice of this Order by personal service or otherwise, whether acting

1 attorneys and those persons in active concert or participation with him who

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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or to such agent as the Commission may direct, pursuant to instructions provided by the Commission through its attorneys to be used for equitable relief.

C. Any and all funds paid pursuant to this Order, including this

1 [redacted] from his financial statement, then judgment in the amount of One hundred and [redacted]



1 telephone number of each person employed in any capacity by such business,  
2 including as an independent contractor; that person's job title or position; the date  
3 upon which the person commenced work; and the date and reason for the person's  
4 termination, if applicable;

5 C. Customer files containing the names, addresses, phone numbers,  
6 dollar amounts paid, quantity of items or services purchased, and description of  
7 items or services purchased, to the extent such information is obtained in the  
8 ordinary course of business;

9 D. Complaints and refund requests (whether received directly, indirectly  
10 or through any third party) and any responses to those complaints or requests;

11 E. Copies of all sales scripts, training materials, advertisements, or other  
12 marketing materials; and

13 F. All records and documents necessary to demonstrate full compliance  
14 with each provision of this Order, including but not limited to, copies of  
15 acknowledgments of receipt of this Order, required by Paragraph X, and all reports  
16 submitted to the FTC pursuant to Paragraph IX.

17 **VIII. Compliance Monitoring**

18 IT IS FURTHER ORDERED that, for the purpose of monitoring and  
19 investigating compliance with any provision of this Order,

20 A. Within ten (10) days of receipt of written notice from a representative  
21 of the Commission, Defendant Elliott shall submit additional written reports,  
22 sworn to under penalty of perjury; produce documents for inspection and copying;  
23 appear for deposition; and/or provide entry during normal business hours to any  
24 business location in such defendant's possession or direct or indirect control to  
25 inspect the business operation.

26 B. In addition, the Commission is authorized to monitor compliance with

1 court, using the procedures prescribed by Fed. R. Civ. P. 30, 31,  
2 33, 34, 36, and 45;

3 2. posing as consumers and suppliers to Defendant Elliott, his  
4 employees, or any other entity managed or controlled in whole

5 or in part by Defendant ELLIOTT, or any of his agents, employees, or

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notice shall include the name and address of each

[REDACTED]

[REDACTED]

[REDACTED]

1

telephone numbers of Defendant Elliott;

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**X. Distribution of Order by Defendant**

IT IS FURTHER ORDERED that, for a period of five (5) years from the date of entry of this Order, Defendant Elliott shall deliver copies of the Order as directed below:

1 proceeding related to or associated with the transactions or the occurrences that are  
2 the subject of the Complaint, without service of subpoena.

3 **XII. Independence of Obligations**

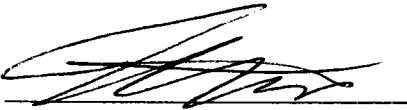
IT IS FURTHER ORDERED that each of the obligations imposed by this



1 THE PARTIES STIPULATE TO THE FOREGOING ORDER:  
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7 Chris M. Couillou, Esq.  
8 ccouillou@ftc.gov  
9 Counsel for the Plaintiff  
10 Federal Trade Commission  
11 225 Peachtree Street, Suite 1500  
12 Atlanta, GA 30303  
13 (404) 656-1353 (voice)  
14 (404) 656-1379 (fax)

15 

16 Thomas A. Brooker II, Esq. (SPN162770)



Defendant Scott Elliott

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

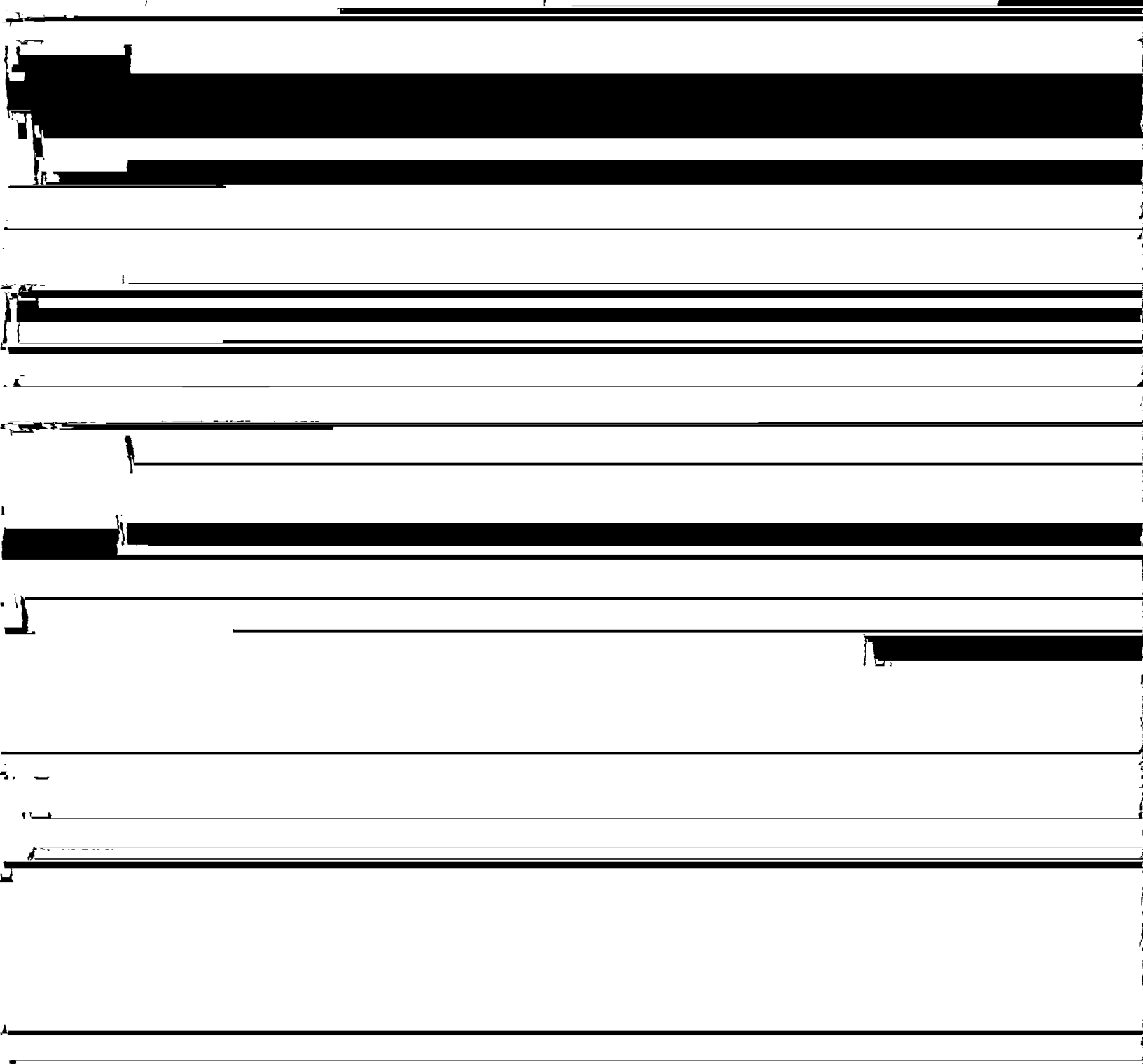
FEDERAL TRADE COMMISSION,

Plaintiff

v.

Case No. CV 07-3654 GW FMOx

**AFFIDAVIT CERTIFYING RECEIPT  
OF FINAL ORDER**





1 \_\_\_\_\_, 2008. A true and correct copy of the Order that was  
2 received is appended to this Affidavit.

3

4 **I declare under penalty of perjury that the foregoing is true and correct.**

5 Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2008 in \_\_\_\_\_

6 County, State of \_\_\_\_\_.

7

8 By: \_\_\_\_\_

9 Scott Elliott

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15 Notary Public

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17 My Commission expires: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

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I, Chris M. Couillou, hereby certify as follows:

1. I am an attorney employed by and representing the Federal Trade Commission. I am not a party to this action.

2. On June 13, 2008, I served the foregoing document, entitled "Stipulated Final Order for Permanent Injunction and Other Equitable Relief against Defendant Scott Elliot" on interested parties in this matter by causing a