

Case No. 08-civ-61686 SEITZ/O'SULLIVAN

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ACE GROUP, INC., a Delaware corporation, d/b/a
AMERICAN CREDIT EXPERTS, INC., THE ACE
GROUP, INC., THE ACE GROUP, and ACE,

LEGAL CREDIT REPAIR CENTER, INC., a

(collectively, "Defendants").

Whereas the Plaintiff has alleged that Defendants have engaged in and are likely to engage in acts and practices that violate Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a), and the Credit Repair Organizations Act, 15 U.S.C. §§ 1679-1679j, and that the FTC is therefore likely to prevail on the merits of this action;

Whereas the Plaintiff has further alleged that weighing the equities and considering

Plaintiff's likelihood of ultimate success on the merits, an order with a Preliminary Injunction and other equitable relief ("Order for Preliminary Injunction") is in the public interest;

Whereas the Plaintiff has further alleged that there is thus good cause for issuing this Order for Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65(b);

Whereas the Defendants, while denying all allegations of wrongdoing set forth in the

Complaint, have stipulated and agreed that the Plaintiff is entitled to the relief requested in the

all parties hereto;

2. Venue lies properly with this Court;
3. The parties stipulate that they consent to entry of a Preliminary Injunction.

Defendants stipulate to this Order for a Preliminary Injunction without a hearing on any issue of law or fact herein and have agreed to the entry by the Court of this Order without admission of any wrongdoing by them;

4. There is good cause for issuing this Order for Preliminary Injunction and other equitable relief pursuant to Federal Rule of Civil Procedure 65(a), to prevent continued unlawful activity;
5. Weighing the equities and considering Plaintiff's likelihood of ultimate success on the merits, this Order for a Preliminary Injunction and other equitable relief is in the public interest; and

6. No security is required of any agency of the United States for the issuance of

preliminary injunction order. Fed. R. Civ. P. 65(c).

DEFINITIONS

wherever located.

B. “Assisting others” means knowingly providing any of the following goods or services to another entity: (1) performing customer service functions, including, but not limited to, receiving or responding to consumer complaints; (2) formulating or providing, or arranging for the formulation or provision of any marketing material; (3) providing names of, or assisting

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ICRC and their successors and assigns; and Michael Simon, M.D.; K. [REDACTED]

individually, collectively, or in any combination.

H. “**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 the information can be obtained and translated, if necessary, through detection devices into reasonably usable form. A draft or non-identical copy is a separate document within the meaning of the term.

I. “**Plaintiff**” means the Federal Trade Commission.

J. The terms “**and**” and “**or**” in this Order shall be construed conjunctively or disjunctively, as necessary to make the applicable sentence or phrase inclusive rather than exclusive.

K. The term “**including**” shall mean “including without limitation.”

implication, any material fact, including, but not limited to, misrepresenting that they can

improve substantially consumers' credit reports and files by removing and

[REDACTED]

III. FINANCIAL STATEMENTS

IT IS FURTHER ORDERED that, within fourteen (14) days after entry of this Order, Defendants shall provide the FTC with completed financial statements, on the forms attached to this Order as Attachments A and B, for each Defendant individually and for each credit repair

organization of which a Defendant is an officer, member, or otherwise directs and/or controls.

[REDACTED]

receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, including, but not limited to, fictitious business names are hereby restrained and enjoined from destroying, erasing

mutilating, concealing, altering, or otherwise disposing of, in any manner, directly or indirectly, any contracts, accounting data, correspondence, email, advertisements, computer tapes, discs, or other computerized storage media, books, written or printed records, handwritten notes, telephone logs, telephone scripts, recordings, receipt books, ledgers, personal and business cancelled checks and check registers, bank statements, appointment books, copies of federal,

state or local business records.

any partnership, limited partnership, joint venture, sole proprietorship,

corporation or limited liability company, without first providing the FTC with

written statement disclosing: (1) the name of the business entity; (2) the address and telephone number of the business entity; (3) the names of the business entity's officers, directors, principals, managers and employees; and (4) a detailed description of the business entity's intended activities.

- C. Selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, credit card number, bank account number, e-mail address, credit report, or other identifying information of any person who paid any money to any Defendant, at any time prior to the entry of this Order, in connection with the purchase of credit repair services. *Provided*, however, that Defendants may disclose such identifying information to a law enforcement agency, or as required by any law, regulation, or court order.

VIII. DISTRIBUTION OF ORDER BY DEFENDANTS

IX. MONITORING

IT IS FURTHER ORDERED that agents or representatives of the FTC may contact Defendants or Defendants' agents or representatives directly and anonymously for the purpose of monitoring compliance with Sections I and II of this Order, and may tape record any oral communications that occur in the course of such contacts.

X. SERVICE OF ORDER

IT IS FURTHER ORDERED that the FTC may serve copies of this Order by facsimile transmission, personal or overnight delivery, or U.S. Mail on: (1) Defendants, or (2) any other person or entity that may be subject to any provision of this Order, including, but not limited to, commercial mail boxes.

IT IS FURTHER ORDERED that service on the FTC shall be performed by delivery

IT IS FURTHER ORDERED, that service on the FTC shall be performed by delivery to the attention of Michele Stalls at the Federal Trade Commission, Northeast Region, One

FOR THE FEDERAL TRADE COMMISSION:

/s/ _____
MICHELE STOLLS (A5501233)
ROBIN E. EICHEN (A5501247)
Attorneys for Plaintiff
1 Bowling Green, Suite 318
New York, NY 10004
(212) 607-2829
mstolls@ftc.gov; reichen@ftc.gov

FOR THE DEFENDANTS:

/s/ _____
REED B. McCLOSKEY (297534)
FREEDMAN & McCLOSKEY
Attorneys for Defendants
1 East Broward Boulevard, Suite 700

/s/ _____
MELVIN KESSLER
Individually, and as owner and officer of
The Ace Group, Inc.
2000 West Commercial Blvd., Suite 101

Ft. Lauderdale, FL 33301
(954) 764-3800
rbm@fmfloridalaw.com

Suite 201
Fort Lauderdale, FL 33309

/s/ _____
GERALD ROTH

/s/ _____
MICHAEL SINGER

FEDERAL TRADE COMMISSION
FINANCIAL STATEMENT OF INDIVIDUAL DEFENDANT

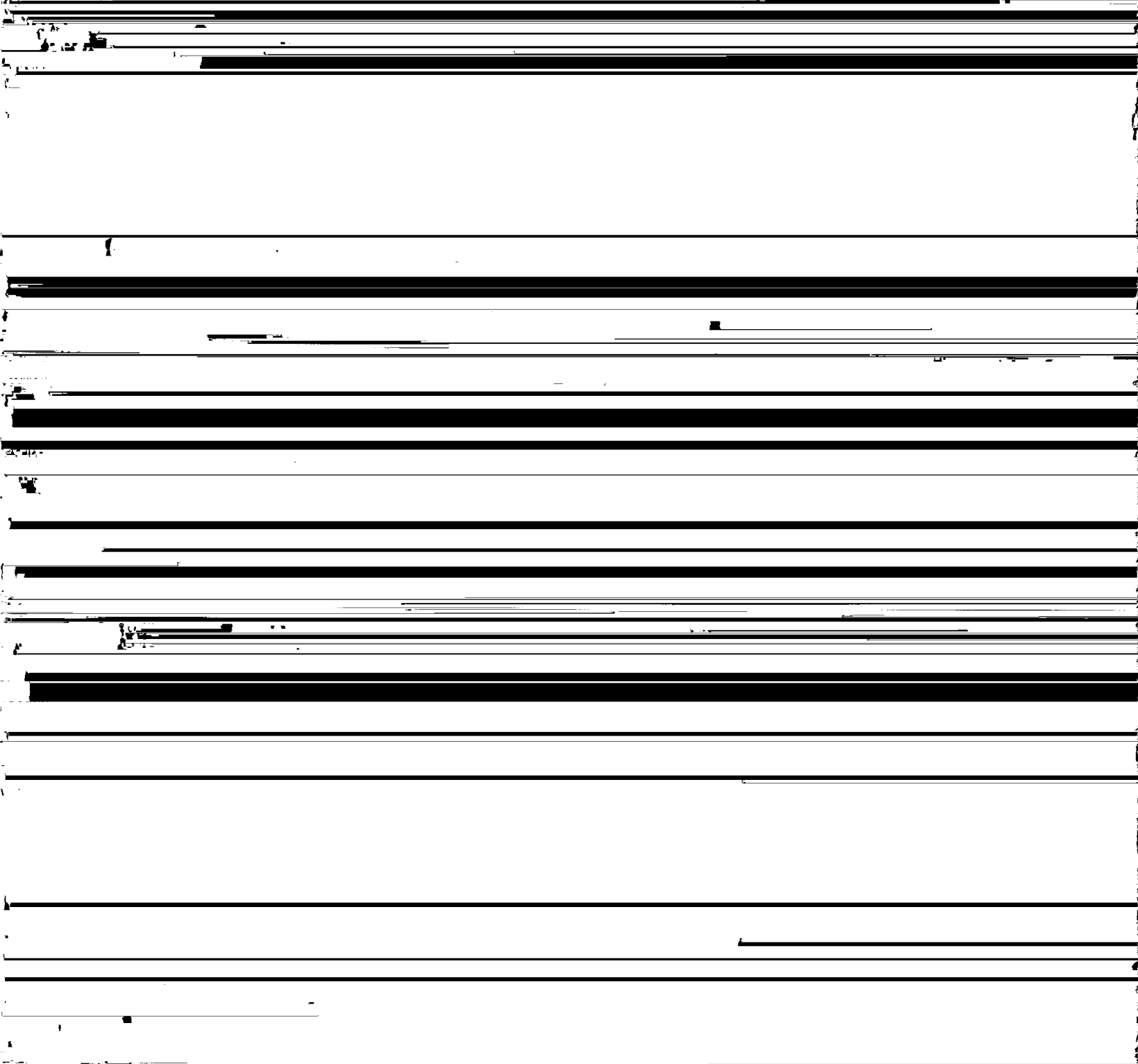
Information

2. "Dependents" include your live-in companion, dependent children, or any other person whom you or your spouse

BACKGROUND INFORMATION

Item 1. Information About You

Your Full Name _____ Social Security No. _____



E-Mail Address _____ Internet Home Page _____

Previous Addresses for past five years:

Address	Rent or Own?	From/Until
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Name & Address of Nearest Living Relative or Friend _____

Telephone No. _____

Item 5. Information About Dependents Who Live With You

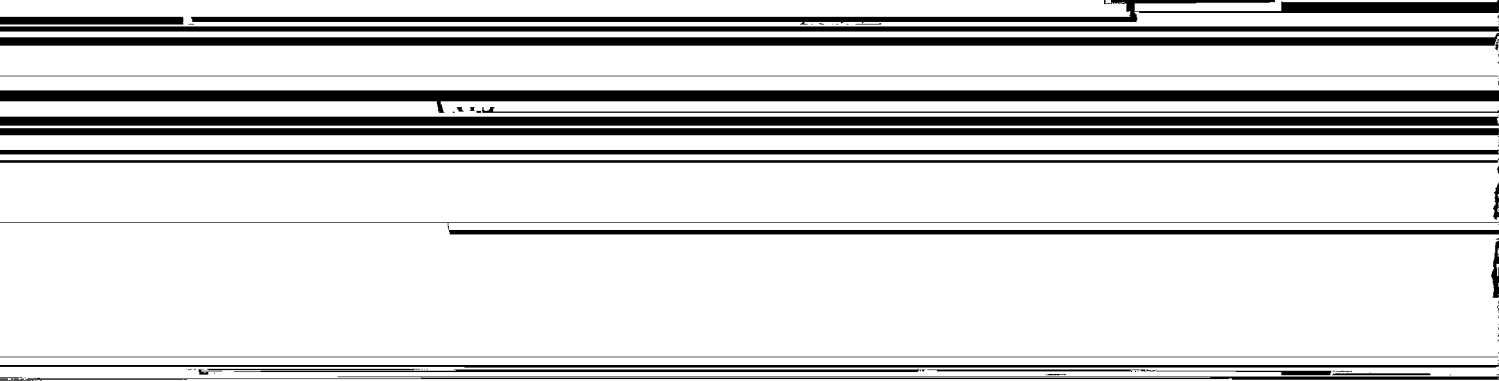
▶Name _____ Date of Birth _____

Relationship _____ Social Security No. _____

▶Name _____ Date of Birth _____

Relationship _____ Social Security No. _____

▶Name _____ Date of Birth _____



Item 6. Information About Dependents Who Do Not Live With You

▶Name & Address _____

Date of Birth _____ Relationship _____ Social Security No. _____

▶Name Address _____

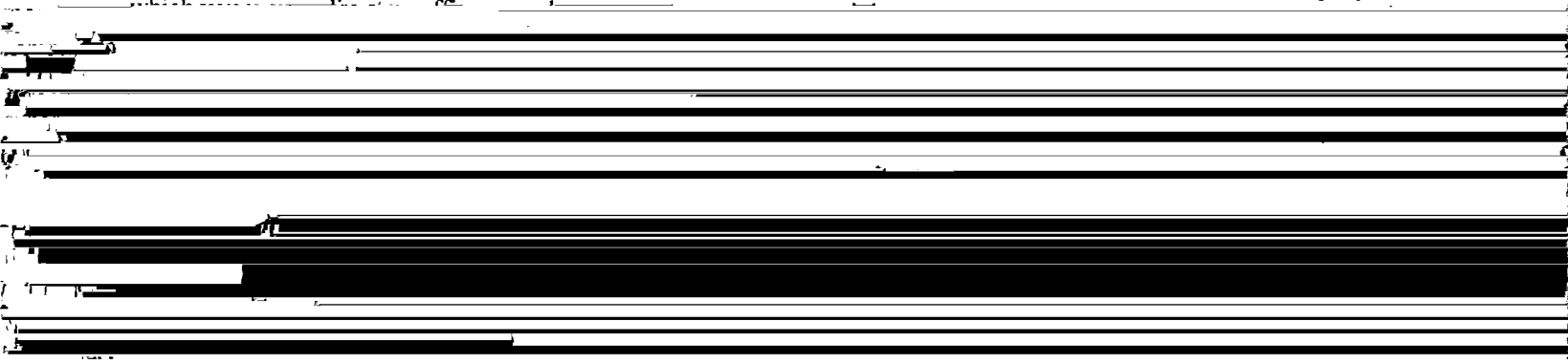
Date of Birth _____ Relationship _____ Social Security No. _____

▶Name & Address _____

Date of Birth _____ Relationship _____ Social Security No. _____

Item 7. Employment Information

Provide the following information for this year-to-date and for each of the previous five full years, for each company of



Income Received: This year-to-date: \$ _____ : \$ _____
20____ : \$ _____ : \$ _____
_____ : \$ _____ : \$ _____

►Company Name & Address _____

Positions Held with Beginning and Ending Dates _____

Income Received: This year-to-date: \$ _____ : \$ _____
20____ : \$ _____ : \$ _____

►Company Name & Address _____

Dates Employed: From (Month/Year) _____ To (Month/Year) _____

Positions Held with Beginning and Ending Dates _____

Income Received: This year-to-date: \$ _____ : \$ _____
20____ : \$ _____ : \$ _____

lawsuits that resulted in final judgments or settlements in Items 16 and 25).

Opposing Party's Name & Address _____

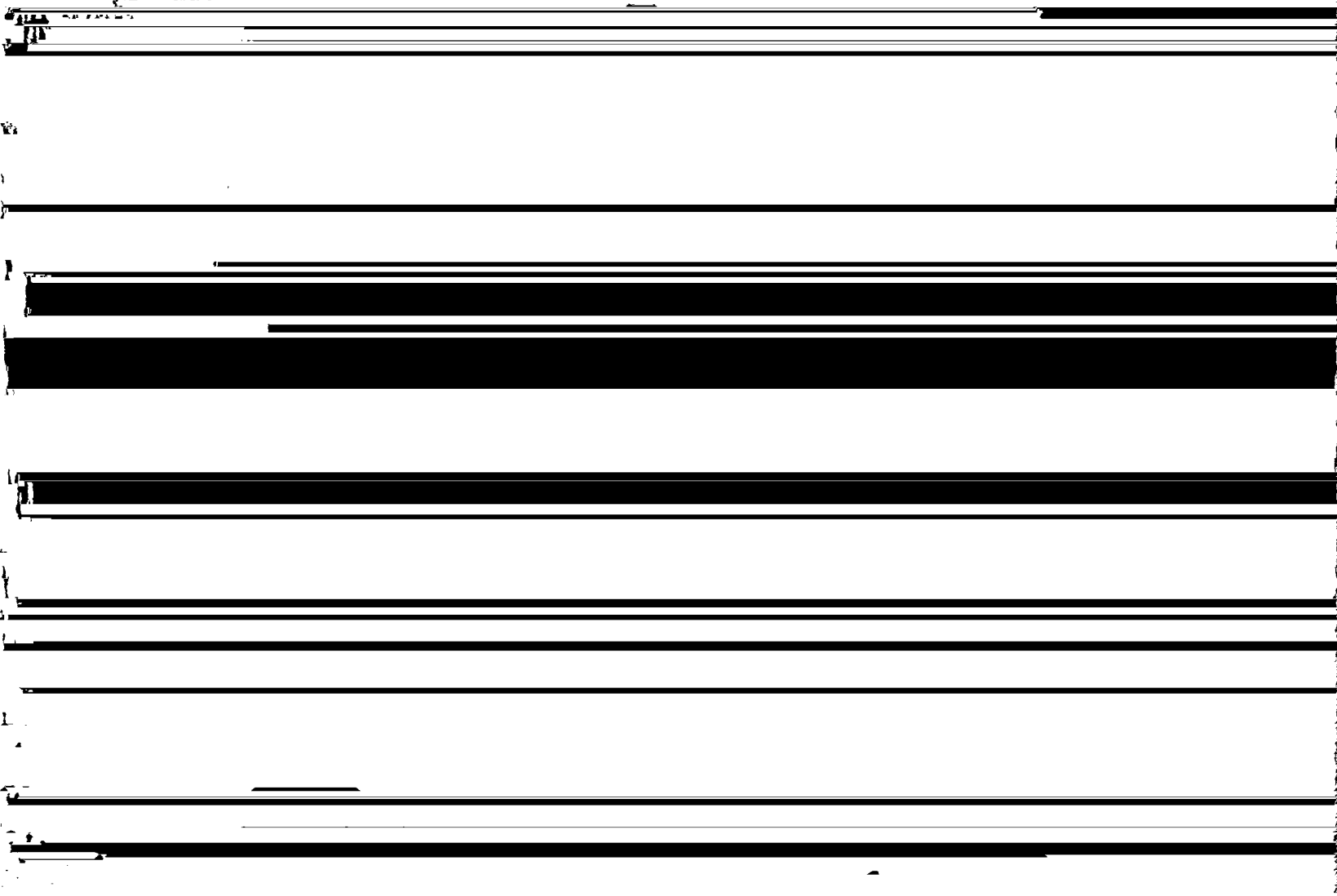
Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Item 10. Safe Deposit Boxes

List all safe deposit boxes located within the United States and describe the contents of each box.



dependents, or held by others for the benefit of you, your spouse, or any of your dependents. *On a separate page, describe the contents of each box.*

Owner's Name

Name & Address of Depository Institution

Box No.

FINANCIAL INFORMATION: ASSETS AND LIABILITIES

REMINDER: "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or elsewhere, whether held individually or jointly.

Item 12. Cash, Bank, and Money Market Accounts

List cash and all bank and money market accounts, including but not limited to, checking accounts, savings accounts, and certificates of deposit, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents. The term "cash" includes currency and uncashed checks.

Cash on Hand \$ _____ Cash Held For Your Benefit \$ _____

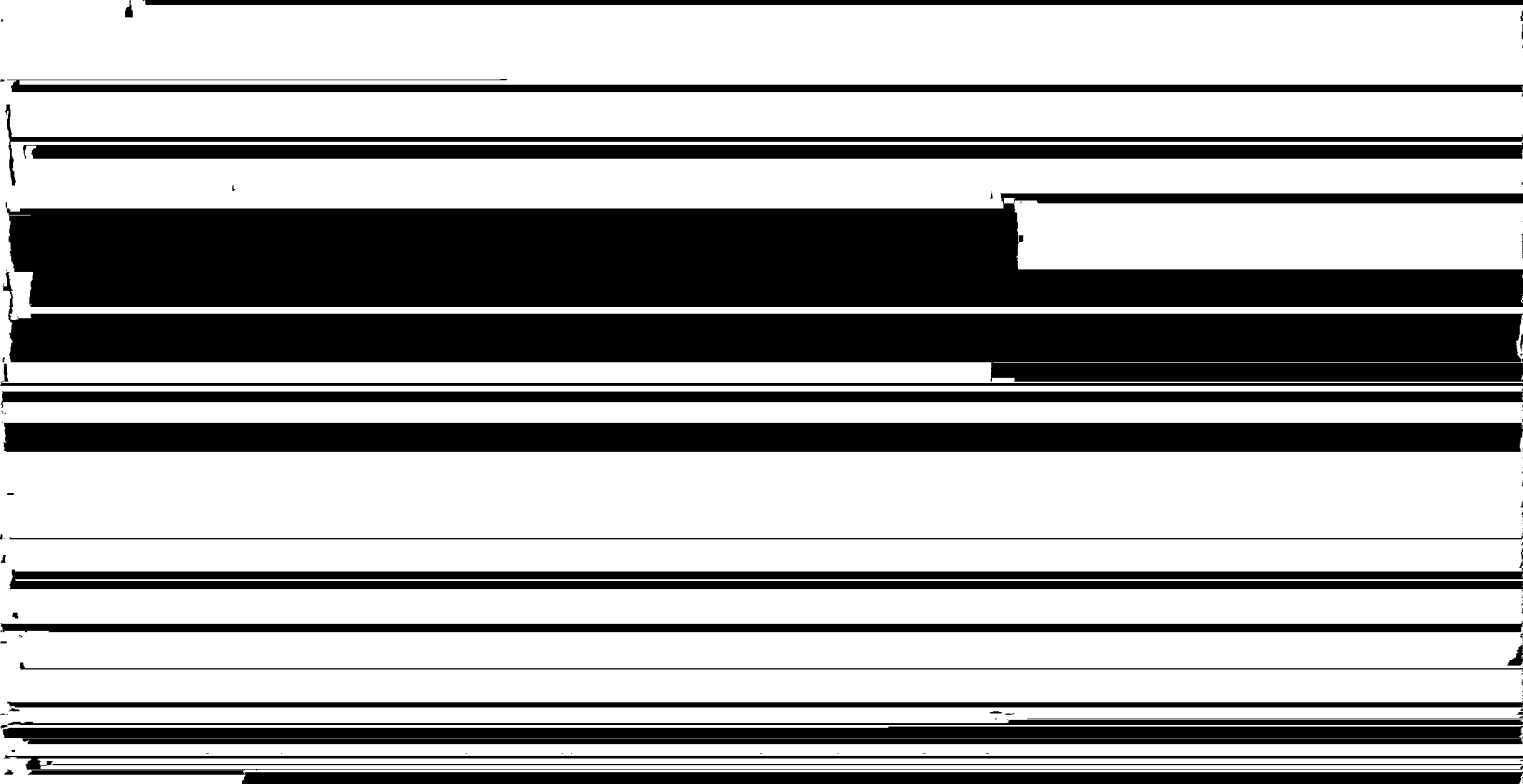
<u>Name on Account</u>	<u>Name & Address of Financial Institution</u>	<u>Account No.</u>	<u>Current Balance</u>
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

Item 13. U.S. Government Securities

List all U.S. Government securities held by you, your spouse, or your dependents.

_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

List all publicly traded securities, including but not limited to, stocks, stock options, registered and unregistered bonds, etc.



municipal bonds, and mutual funds, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

► Issuer _____ Type of Security _____ No. of Units Owned _____

Name on Security _____ Current Fair Market Value \$ _____ Loan(s) Against Security \$ _____

Broker House, Address _____ Broker Account No. _____

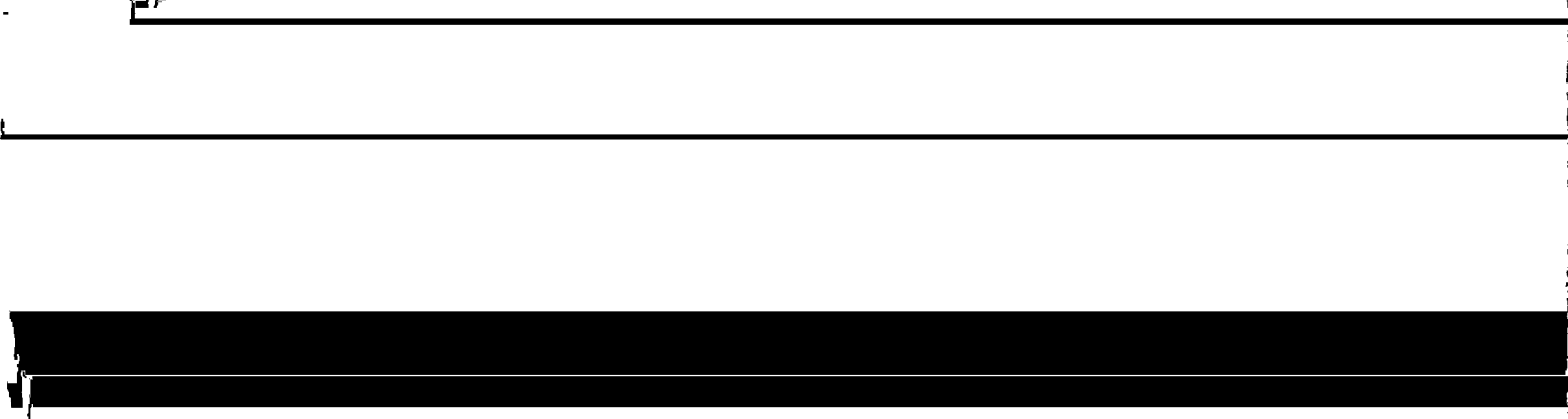
► Issuer _____ Type of Security _____ No. of Units Owned _____

Name on Security _____ Current Fair Market Value \$ _____ Loan(s) Against Security \$ _____

Broker House, Address _____ Broker Account No. _____

Item 15. Other Business Interests

List all other business interests, including but not limited to, non-public corporations, partnerships, S corporations, limited



List all other amounts owed to you, your spouse, or your dependents.

Debtor's Name, Address, & Telephone No. _____

List all life insurance policies held by you, your spouse, or your dependents.

►Insurance Company's Name, Address, & Telephone No. _____

Insured _____ Beneficiary _____ Face Value \$ _____

Policy No. _____ Loans Against Policy \$ _____ Surrender Value \$ _____

►Insurance Company's Name, Address, & Telephone No. _____

furniture and household goods of value, computer equipment, electronics, coins, stamps, artwork, gemstones, jewelry, bullion, other collectibles, copyrights, patents, and other intellectual property, held by you, your spouse, or your dependents or held by others for the benefit of you, your spouse, or your dependents

<u>Property Category</u> (e.g., artwork, jewelry)	<u>Name of Owner</u>	<u>Property Location</u>	<u>Acquisition Cost</u>	<u>Current Value</u>
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			\$ _____	\$ _____
			\$ _____	\$ _____
			\$ _____	\$ _____
			\$ _____	\$ _____
			\$ _____	\$ _____

Item 21. Cars, Trucks, Motorcycles, Boats, Airplanes, and Other Vehicles

List all cars, trucks, motorcycles, boats, airplanes, and other vehicles owned or operated by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

▶ Vehicle Type _____ Make _____ Model _____ Year _____

Registered Owner's Name _____ Registration State & No. _____

Address of Vehicle's Location _____

Purchase Price \$ _____ Current Value \$ _____ Account/Loan No. _____

Lender's Name and Address _____

Original Loan Amount \$ _____ Current Loan Balance \$ _____ Monthly Payment \$ _____

Vehicle Title _____

Registered Owner's Name _____ Registration State & No. _____

Address of Vehicle's Location _____

Purchase Price \$ _____ Current Value \$ _____ Account/Loan No. _____

Lender's Name and Address _____

Original Loan Amount \$ _____ Current Loan Balance \$ _____ Monthly Payment \$ _____

Item 22. Real Property

List all real estate held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

▶Type of Property _____ Property's Location _____

Basis of Valuation _____ Loan or Account No. _____

Lender's Name and Address _____

Current Balance On First Mortgage \$ _____ Monthly Payment \$ _____

Other Loan(s) (describe) _____ Current Balance \$ _____

Name of Credit Card (e.g. Visa) Account No. Name(s) on Current Minimum

MasterCard, Department Store) Account Balance Monthly Payment

		\$	\$
		\$	\$
		\$	\$
		\$	\$
		\$	\$
		\$	\$

Item 24. Taxes Payable

List all taxes, such as income taxes or real estate taxes, owed by you, your spouse, or your dependants.

Type of Tax Amount Owed Year Incurred

	\$	
	\$	
	\$	

Item 25. Judgments or Settlements Owed

List all judgments or settlements owed by you, your spouse, or your dependants.

Opposing Party's Name & Address

Item 26. Other Loans and Liabilities

List all other loans or liabilities in your, your spouse's, or your dependents' names.

▶Name & Address of Lender/Creditor _____

Nature of Liability _____ Name(s) on Liability _____

Date of Liability _____ Amount Borrowed \$ _____ Current Balance \$ _____

Payment Amount \$ _____ Frequency of Payment _____

Nature of Liability _____ Name(s) on Liability _____

Date of Liability _____ Amount Borrowed \$ _____ Current Balance \$ _____

Payment Amount \$ _____ Frequency of Payment _____

OTHER FINANCIAL INFORMATION

Item 27. Tax Returns

List all Federal tax returns that were filed during the last three years beginning with 10-01-07.

List all funds or other assets that are being held in trust or escrow by any person or entity for you, your spouse, or your

dependents. Also list all funds or other assets that are being held in trust or escrow by you, your spouse, or your dependents for any person or entity. Provide copies of all executed trust documents.

Trustee or Escrow Agent's	Date	Grantor	Beneficiaries	Present Market
				\$
				\$
				\$
				\$

\$

\$

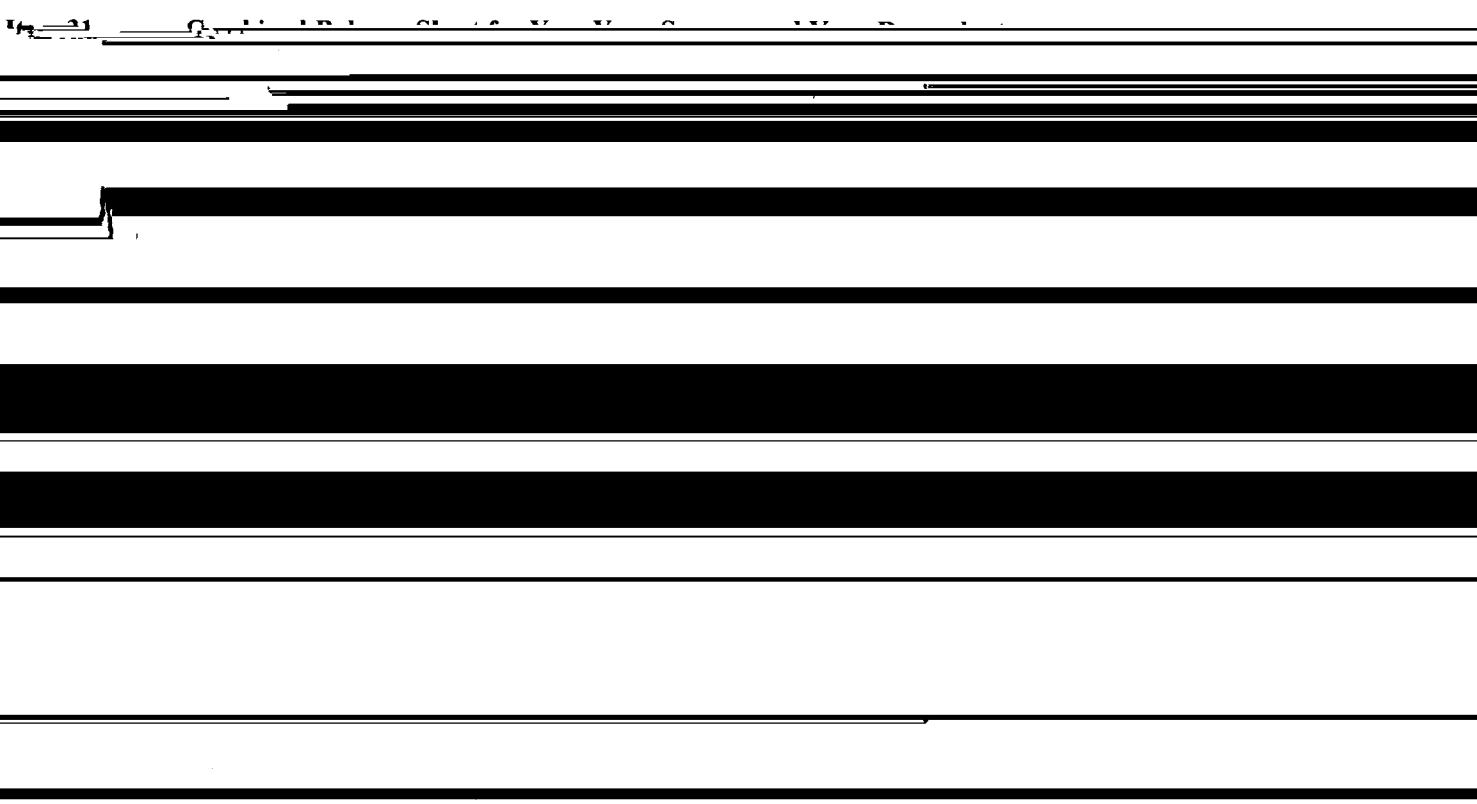
\$

\$

Item 30. Transfers of Assets

List each person to whom you have transferred, in the aggregate, more than \$2,500 in funds or other assets during the

SUMMARY FINANCIAL SCHEDULES



ASSETS

Cash on Hand
(Item 12) \$ _____

Cash in Financial Institutions
(Item 12) \$ _____

U.S. Government Securities
(Item 13) \$ _____

Publicly Traded Securities
(Item 14) \$ _____

Other Business Interests
(Item 15) \$ _____

Judgments or Settlements Owed
to You (Item 16) \$ _____

Other Amounts Owed to You
(Item 17) \$ _____

LIABILITIES

Credit Cards
(Item 23) \$ _____

Motor Vehicles - Liens
(Item 21) \$ _____

Real Property - Encumbrances
(Item 22) \$ _____

Loans Against Publicly Traded Securities
(Item 14) \$ _____

Taxes Payable
(Item 24) \$ _____

Judgments or Settlements Owed
(Item 25) \$ _____

Other Loans and Liabilities
(Item 26) \$ _____

Surrender Value of Life Insurance
(Item 18)

Other Liabilities (Item 27)

Item 32. Combined Average Monthly Income and Expenses for You, Your Spouse, and Your Dependents for the Last 6 Months

[REDACTED]

not include credit card payments separately; rather, include credit card expenditures in the appropriate categories.

INCOME

EXPENSES

Salary - After Taxes \$ _____

Mortgage Payments for Residence(s) \$ _____

Fees, Commissions, and Royalties \$ _____

Property Taxes for Residence(s) \$ _____

FEDERAL TRADE COMMISSION
FINANCIAL STATEMENT OF CORPORATE DEFENDANT

Instructions:

1. Complete all items. Enter "None" or "N/A" ("Not Applicable") where appropriate. If you cannot fully answer a question, explain why.
2. In completing this financial statement, "the corporation" refers not only to this corporation but also to each of its predecessors that are not named defendants in this action.
3. When an Item asks for information about assets or liabilities "held by the corporation" include ALL such assets

and liabilities located within the United States or elsewhere held by the corporation.

benefit of the corporation.

BACKGROUND INFORMATION

Item 1. General Information

Corporation's Full Name _____

Primary Business Address _____ From (Date) _____

Telephone No. _____ Fax No. _____

E-Mail Address _____ Internet Home Page _____

All other current addresses & previous addresses for past five years, including post office boxes and mail drops:

Address _____ From/Until _____

Address _____ From/Until _____

Address _____ From/Until _____

All predecessor companies for past five years:

Name & Address _____ From/Until _____

Name & Address _____ From/Until _____

Name & Address _____ From/Until _____

Item 2. Legal Information

Federal Taxpayer ID No. _____ State & Date of Incorporation _____

State Tax ID No. _____ State _____ Profit or Not For Profit _____

Corporation's Present Status: Active _____ Inactive _____ Dissolved _____

If Dissolved: Date dissolved _____ By Whom _____

_____ reasons

Fiscal Year-End (Mo./Day) _____ Corporation's Business Activities _____

Item 3. Registered Agent

Name of Registered Agent _____

Address _____ Telephone No. _____

Item 4. Principal Stockholders

List all persons and entities that own at least 5% of the corporation's stock.

<u>Name & Address</u>	<u>% Owned</u>
_____	_____
_____	_____
_____	_____

Item 5. Board Members

List all members of the corporation's Board of Directors.

<u>Name & Address</u>	<u>% Owned</u>	<u>Term (From/Until)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Item 6. Officers

List all of the corporation's officers, including *de facto* officers (individuals with significant management responsibility

whose titles do not reflect the nature of their positions).

<u>Name & Address</u>	<u>% Owned</u>
_____	_____
_____	_____
_____	_____

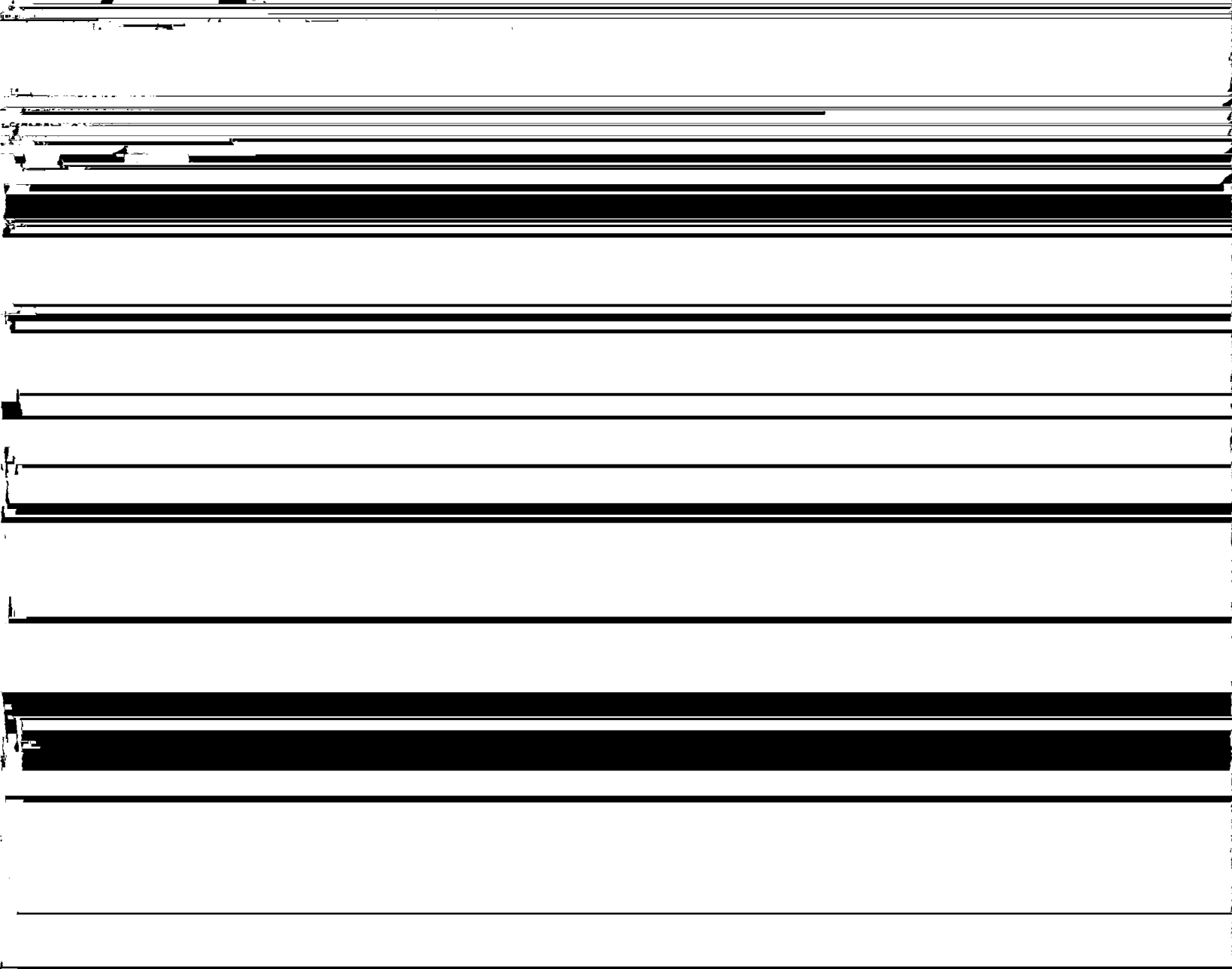
Item 7. Businesses Related to the Corporation

List all corporations, partnerships, and other business entities in which this corporation has an ownership interest.

<u>Name & Address</u>	<u>Business Activities</u>	<u>% Owned</u>

State which of these businesses, if any, has ever transacted business with the corporation _____

Item 8. Businesses Related to Individuals



Item 10. Outside Accountants

List all outside accountants retained by the corporation during the last three years.

<u>Name</u>	<u>Firm Name</u>	<u>Address</u>	<u>CPA/PA?</u>

Item 11. Corporation's Recordkeeping

List all individuals within the corporation with responsibility for keeping the corporation's financial books and records for the last three years.

<u>Name, Address, & Telephone Number</u>	<u>Position(s) Held</u>

Item 17 Pending Litigation Filed by the Corporation

lawsuits that resulted in final judgments or settlements in favor of the corporation in Item 25).

Opposing Party's Name & Address _____

~~Item 14~~ Current Lawsuits Filed Against the Corporation

List all pending lawsuits that have been filed against the corporation in court or before an administrative agency. (List lawsuits that resulted in final judgments, settlements, or orders in Items 26 - 27)

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Court's Name & Address _____

Docket No. _____ Relief Requested _____ Nature of Lawsuit _____

_____ Status _____

Opposing Party's Name & Address _____

Item 15. Bankruptcy Information

List all state insolvency and federal bankruptcy proceedings involving the corporation.

Commencement Date _____ Termination Date _____ Docket No. _____

If State Court: Court & County _____ If Federal Court: District _____

Disposition _____

Item 16. Safe Deposit Boxes

List all safe deposit boxes, located within the United States or elsewhere, held by the corporation, or held by others for the benefit of the corporation. *On a separate page, describe the contents of each box.*

<u>Owner's Name</u>	<u>Name & Address of Depository Institution</u>	<u>Box No.</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

FINANCIAL INFORMATION

REMINDER: When an Item asks for information about assets or liabilities “held by the corporation,” include **ALL** such assets and liabilities, located within the United States or elsewhere, held by the corporation or held by others for the benefit of the corporation.

Item 17. Tax Returns

List all federal and state corporate tax returns filed for the last three complete fiscal years. *Attach copies of all returns.*

<u>Federal/ State/Both</u>	<u>Tax Year</u>	<u>Tax Due Federal</u>	<u>Tax Paid Federal</u>	<u>Tax Due State</u>	<u>Tax Paid State</u>	<u>Preparer's Name</u>
_____	_____	\$ _____	\$ _____	\$ _____	\$ _____	_____
_____	_____	\$ _____	\$ _____	\$ _____	\$ _____	_____
_____	_____	\$ _____	\$ _____	\$ _____	\$ _____	_____

Item 18. Financial Statements

List all U.S. Government obligations, including but not limited to, savings bonds, treasury bills, or treasury notes, held by the corporation. Also list all publicly traded securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by the corporation.

Issuer _____ Type of Security/Obligation _____

No. of Units Owned _____ Current Fair Market Value \$ _____ Maturity Date _____

Issuer _____ Type of Security/Obligation _____

Current Fair Market Value \$ _____ Maturity Date _____

Item 22. Real Estate

List all real estate, including leaseholds in excess of five years, held by the corporation.

Type of Property _____ Property's Location _____

Name(s) on Title and Ownership Percentages _____

Current Value \$ _____ Loan or Account No. _____

Lender's Name and Address _____

Monthly Payment \$ _____ Monthly Payment \$ _____

Opposing Party's Name & Address _____

Court's Name & Address _____ Docket No. _____

Nature of Lawsuit _____ Date of Judgment _____ Amount \$ _____

Opposing Party's Name & Address _____

Court's Name & Address _____ Docket No. _____

Nature of Lawsuit _____ Date of Judgment _____ Amount \$ _____

~~Type 7C Monetary Judgments and Settlements Owed By the Corporation~~

List all monetary judgments and settlements, recorded and unrecorded, owed by the corporation.

Opposing Party's Name & Address _____

Court's Name & Address _____ Docket No. _____

Nature of Lawsuit _____ Date _____ Amount \$ _____

Opposing Party's Name & Address _____

Court's Name & Address _____ Docket No. _____

Nature of Lawsuit _____ Date of Judgment _____ Amount \$ _____

Opposing Party's Name & Address _____

Court's Name & Address _____ Docket No. _____

Nature of Lawsuit _____ Date of Judgment _____ Amount \$ _____

Opposing Party's Name & Address _____

Address _____ Telephone No. _____

Agreement Date _____ Nature of Agreement _____

Item 28. Credit Cards

List all of the corporation's credit cards and store charge accounts and the individuals authorized to use them

Name of Credit Card or Store

Names of Authorized Users and Positions Held

<u>Name of Credit Card or Store</u>	<u>Names of Authorized Users and Positions Held</u>

Item 29. Compensation of Employees

List all compensation and other benefits received from the corporation by the five most highly compensated employees, independent contractors, and consultants (other than those individuals listed in Items 5 and 6 above), for the two previous fiscal years and current fiscal year-to-date. "Compensation" includes, but is not limited to, salaries, commissions, consulting fees, bonuses, dividends, distributions, royalties, pensions, and profit sharing plans. "Other benefits" include, ~~including, but not limited to, health care payments, rent, car payments, and insurance premiums, whether paid directly to the~~

