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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

TANNER GARRETT VAUGHN, individually
and doing business as Lead Expose, Inc., and
Uptown Media, Inc.,

Defendant.

Case No. 2:11-cv-630-RAJ

**STIPULATED TEMPORARY
RESTRAINING ORDER**

On April 13, 2011, Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), filed

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1 www.BreakingNewsat6.com and www.Channel9NewsReport.com, is an objective news report;

2 2. Objective news reporters have performed independent tests of any product,
3 service, or program, including, but not limited to, a Covered Product; and

4 B. Failing to disclose, or disclose adequately, that the content of any website or other
5 publication, including sites using the domain names www.BreakingNewsat6.com and
6 www.Channel9NewsReport.com, has not been authored by an objective journalist but is in fact an
7 advertisement placed for compensation.

8 **ASSET PROVISIONS**

9 **II. ASSET PRESERVATION**

10 **IT IS FURTHER ORDERED** that:

11 A. Defendant, and his officers, agents, servants, employees, and attorneys, and all other
12 persons in active concert or participation with any of them, who receive actual notice of this Order by
13 personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary,
14 division, or other device, or any of them, are hereby restrained and enjoined from directly or indirectly
15 selling, transferring, alienating, liquidating, encumbering, pledging, loaning, assigning, concealing,
16 dissipating, converting, withdrawing or making any other disposition of any assets or any interest
17 therein, wherever located, including any assets outside the territorial United States, that are owned,
18 controlled or held by, or for the benefit of, in whole or in part, Defendant, or are in the actual or
19 constructive possession of Defendant.

20 B. The assets affected by this Section shall include both existing assets and assets acquired
21 after the effective date of this Order.

22 C. Notwithstanding Section II.A above, Defendant may withdraw, transfer, encumber, or
23 otherwise dissipate assets up to \$750.00 prior to the expiration of this Order to pay actual, ordinary,
24 and necessary business or living expenses that Defendant reasonably incurs and Defendant may also
25 pay any reasonable attorneys' fees. Further, funds currently held in retainer to pay reasonable
26 attorneys fees shall not be subject to this Order.

27 D. To the extent that Defendant withdraws, transfers, encumbers, or otherwise dissipates
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1 address, telephone number, date of service, and manner of service of each person or entity Defendant
2 served with a copy of this Order in compliance with this provision.

3 **VIII. CONSUMER REPORTING AGENCIES**

4 **IT IS FURTHER ORDERED** that, pursuant to Section 604(a)(1) of the Fair Credit Reporting
5 Act, 15 U.S.C. § 1681b(a)(1), any consumer reporting agency may furnish a consumer or credit report
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