

Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction and Monetary Judgment ("Order") to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants participated in deceptive and unfair acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, the FTC's Telemarketing Sales Rule, 16 C.F.R. Part 310, and the Unordered Merchandise Statute, 39 U.S.C. § 3009, by deceiving consumers into believing that purchases or donations would significantly help handicapped or disabled people and by sending unordered merchandise.
3. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.
4. Defendants waive any claim that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agree to pay their own costs and attorney fees.

5. Defendants waive and release any claims they may have against the Commission that relate to this action. The parties agree that this Order resolves all allegations in the Complaint.

6. Defendants waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

For the purpose of this Order, the following definitions apply:

A. "Defendants" means all the Corporate Defendants and the Individual Defendant, individually, collectively, or in any combination.

B. "Corporate Defendants" means American Handicapped and

ORDER

I. PERMANENT BAN

IT IS ORDERED that Defendants are permanently restrained and enjoined from telemarketing, advertising, marketing, promoting, offering for sale, or assisting in the telemarketing, advertising, marketing, promoting, or offering for sale, of any goods or services for the purported benefit of handicapped, disabled or disadvantaged persons.

II. PROHIBITIONS AGAINST MISREPRESENTATIONS

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with promoting or offering for sale any good or service, are permanently restrained and enjoined from misrepresenting, expressly or by implication:

A. that all or most persons employed by working on behalf of any company are members of any particular population of persons, such as veterans, service members, firefighters, members of law enforcement, or their families, or that all or most wages paid by any company are paid to members of any particular population of persons, such as veterans, service members, firefighters, members of law enforcement, or their families;

B. that the person soliciting the consumer is a member of any particular population of persons, such as

A. misrepresenting or assisting others in misrepresenting, expressly or by implication:

1. that all or most persons employed by or working on behalf of any company are members of any particular population of persons, such as veterans, service members, firefighters, members of law enforcement, or their families, or that all or most wages paid by any company are paid to members of any particular population of persons, such as veterans, service members, firefighters, members of law enforcement, or their families;
2. that the person soliciting the consumer is a member of any particular population of persons, such as veterans, service members, firefighters, members of law enforcement, or their families;
3. that any company's products are packaged or manufactured by any particular population of persons, such as veterans, service members, firefighters, members of law enforcement, or their families;
4. that the consumer's purchase will benefit a charitable organization;
5. that the company operates or is affiliated with a charitable organization; or
6. any other fact material to consumers concerning any good or service, such as: the total cost to purchase, any material restrictions, limitations, or

V. MONETARY JUDGMENT AND SUSPENSION

IT IS FURTHER ORDERED that:

- A. Judgment in the amount of Four Million, Five Thousand, Five Hundred Forty-Four Dollars and Eighty-Three Cents (\$4,005,544.83) is entered in favor of the Commission against Individual Defendants and Corporate Defendants, jointly and severally.
- B. The judgment is suspended subject to the Subsections below.
- C. The Commission's agreement to the suspension of the judgment is expressly premised upon the truthfulness, accuracy, and completeness of Defendants' sworn financial statements and related documents (collectively, "financial representations") submitted to the Commission, namely:
1. the Financial Statement of Adli NajDasuqi, dated February 29, 2016, including the attachments;
 2. the Financial Statement of American Handicapped and Disadvantaged Workers, Inc., dated March 2016, including the attachments;
 3. the sworn testimony of Adli Dasuqi on September 24, 2015, and November 20, 2015, that American Handicapped, Inc., has never been operative and has no assets; and
 4. additional documentation and information provided by Defendants through their counsel Don Lansky on March 7, 10, and 11, 2016.

D. The suspension of the judgment will be lifted as to any Defendant if, upon motion by the Commission, the Court finds that Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the

H.

VI. CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Defendants, their officers, agents, employees and attorneys, and all others in active concert or participation with any of them, who receive actual notice of this Order, are permanently restrained and enjoined from directly or indirectly:

A. failing to provide sufficient customer information to enable the Commission to efficiently administer consumer redress. If a representative of the Commission requests in writing any information related to redress, Defendant must provide it, in the form prescribed by the Commission, within 14 days.

B. disclosing, using, or benefitting from customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a customer's account (including a credit card, bank account, or other financial account), that any Defendant obtained prior to entry of this Order; and

C. failing to destroy such customer information in all forms in their possession, custody or control within 30 days after receipt of written direction to do so from a representative of the Commission.

Provided, however, that customer information need not be disposed of, and may be disclosed, to the extent request

VII. ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that Defendants obtain acknowledgments of receipt of this Order:

A. Each Defendant, within 7 days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For 10 years after entry of this Order, Defendant Aid Dasuqi, for any business that he, individually or collectively with any other Defendants, is the majority owner or controls directly or indirectly, and each Corporate Defendant, must deliver a copy of this Order to: (1) principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives who participate in conduct related to the subject matter of this Order; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within 7 days of entry of this Order for current personnel. For all hires, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which a Defendant delivered a copy of this Order, that Defendant must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

VIII. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Defendants make timely submissions to the Commission:

A. One year after entry of this Order, each Defendant must submit a compliance report, sworn under penalty of perjury:

1. Each Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Defendant; (b) identify all of that Defendant's businesses by all of their names, telephone

services whether as an employee or otherwise and any entity in which he has any ownership interest; and (c) describe in detail his involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

B. For 10 years after entry of this Order, each Defendant must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:

1. Each Defendant must report any change in: (a) any designated point of contact; or (b) the structure of a corporate Defendant or any entity that Defendant has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity, any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.

2. Additionally, Adli Dasuqi must report any change in: (a) name, including aliases or fictitious name, or residence address; or (b) title or role in any business activity, including any business in which he performs services whether as an employee or otherwise and any entity in which he has any ownership interest, and identify the name, physical address, and Internet address of the business or entity.

C. Each Defendant must submit to the

individually or collectively with any other Defendants, is a majority owner or controls directly or indirectly, must create and retain the following records:

- A. accounting records showing the revenues from all goods or services sold;
- B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person's name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. records of all consumer complaints and refund requests pertaining to telemarketing practices or allegations of sending billing for unordered merchandise, whether received directly or indirectly, such as through a third party, and any response;
- D. all records necessary to demonstrate compliance with each provision of this Order, including all submissions to the Commission;
- E. a copy of each unique script used in the telemarketing or sale of any good or

A. Within 14 days of receipt of a written request from a representative of the Commission, each Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. The Commission is also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rule of Civil Procedure 29, 30 (including telephonic depositions), 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission is authorized to communicate directly with each

pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)(1).

XI. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED this 8th day of June, 2016.

s/Avern Cohn
UNITED STATES DISTRICT JUDGE

Dated: June 8, 2016

SO STIPULATED AND AGREED:

PLAINTIFF FEDERAL TRADE COMMISSION:

s/Amy C. Hocevar _____ Date 5/19/2016

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DEFENDANTS AMERICAN HAND ICAPPED AND DISADVANTAGED
WORKERS, INC., AMERICAN HAND ICAPPED, INC., AND ADLI
DASUQI:

s/Aldi Dasuqi _____ Date: 3/16/2016
ADLI DASUQI