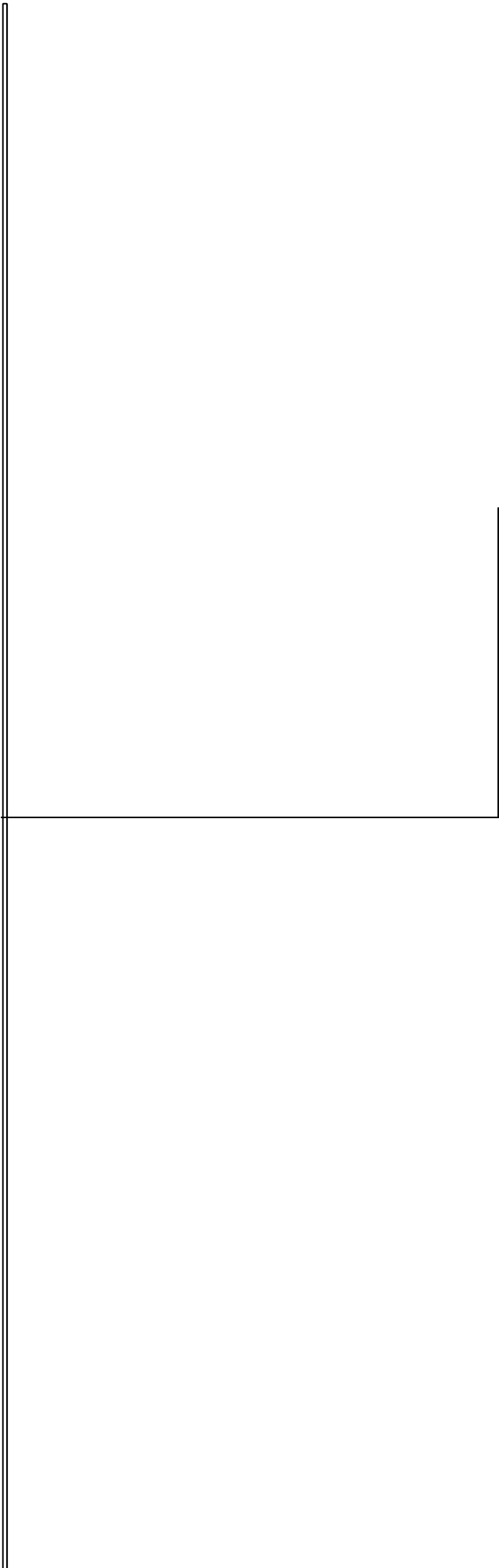


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1 evidences or purports to evidence that a consumer has completed and shown
2 proficiency in a curriculum recognized as necessary to earn the indicated degree,
3 diploma, certification, certificate, or other document, whether denominated as a
4 degree, diploma, certification, certificate, or other name, whether denoted as a real
or novelty item.

5 B. **“Customer”** means any person who has paid, or may be required to pay, for
6 products, services, plans, or programs offered for sale or sold by any other person.

7 C. **“Defendants”** means Capitol Network Distance Learning Programs, LLC, Capital
8 Network Digital Licensing Programs, LLC, Veritas Sales, Inc., Nicholas Pollicino,
9 Anthony Clavien, and Adam Pollicino, individually, collectively, or in any
combination.

10 D. **“Person”** means a natural person, organization, or other legal entity, including a
11 corporation, partnership, proprietorship, association, cooperative, or any other
12 group or combination acting as an entity.

13 E. **“Settling Defendants”** means the Individual Settling Defendants and the Corporate
14 Settling Defendant, individually, collectively, or in any combination. **“Corporate**
15 **Settling Defendant”** means Veritas Sales, Inc. and its successors and assigns.

16 **“Individual Settling Defendants”** means Anthony J. Clavien and Adam F.
17 Pollicino, and any other name by which they may be known.

18 **ORDER**

19 **BAN ON ACADEMIC DEGREE OR CERTIFICATION PROGRAM Individual Settling Def**

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1 of this Order, make a one-time transfer to the FTC or its designated agent
2 of all funds, if any, in: (a) account number xxxx0355 in the name of
3 Veritas Sales, Inc.; (b) account number xxxx1767 in the name of Veritas
4 Sales, Inc.; (c) account number xxxx1809 in the name of Veritas Sales,
5 Inc.; (d) account number xxxx9328 in the name of Veritas Sales, Inc.; (e)
6 account number xxxx0470 in the name of AFP Inc.; (f) account number
7 xxxx0504 in the name of AFP Inc.; (g) account number xxxx1320 in the
8 name of Valais Consulting, Inc.; (h) account number xxxx3631 in the
9 name of Valais Consulting, Inc.; (i) account number xxxx6126 in the name
10 of Adam Pollicino; (j) account number xxxx9541 in the name of Adam
11 Pollicino; and (k) account number xxxx9207 in the name of Anthony
12 Clavien. Upon such transfers, this Order shall impose no further
13 restrictions on such accounts.

14 4. JP Morgan Chase Bank shall, within ten (10) business days of receipt of a
15 copy of this Order, make a one-time transfer to the FTC or its designated
16 agent of all funds, if any, in: (a) account number xxxx2251 in the name of
17 AFP, Inc.; (b) account number xxxx8626 in the name of AFP, Inc.; and (c)
18 account number xxxx7655 in the name of Anthony Clavien. Upon such
19 transfers, this Order shall impose no further restrictions on such accounts.

20 5. Deutsches Bank shall, within ten (10) business days of receipt of a copy of
21 this Order, make a one-time transfer to the FTC or its designated agent of
22 all funds, if any, in account number xxxx5790 in the name of Anthony
23 Clavien. Upon such transfer, this Order shall impose no further
24 restrictions on such account.;

25 C. Upon completion of the asset transfers set forth in Section III.B of this Order, the
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are permanently restrained and enjoined from directly or indirectly:

- 1 A. Disclosing, using, or benefitting from customer information, including the name,
- 2 address, telephone number, email address, social security number, other identifying
- 3 information, or any data that enables access to a customer’s account (including a
- 4 credit card, bank account, or other financial account), that any Defendant obtained
- 5 prior to entry of this Order in connection with the marketing and sale of any
- 6 academic degree or certification program; and
- 7 B. Failing to destroy such customer information in all forms in their possession,
- 8 custody, or control within 30 days after receipt of written direction to do so from a
- 9 representative of the FTC.

10 Provided, however, that customer information need not be disposed of, and may be
11 disclosed, to the extent requested by a government agency or required by law,
12 regulation, or court order.

ORDER ACKNOWLEDGMENTS

13 **V. IT IS FURTHER ORDERED** that the Settling Defendants obtain
14 acknowledgments of receipt of this Order:

- 15 A. Each Settling Defendant, within 7 days of entry of this Order, shall submit (Directly or e
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D. All records necessary

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