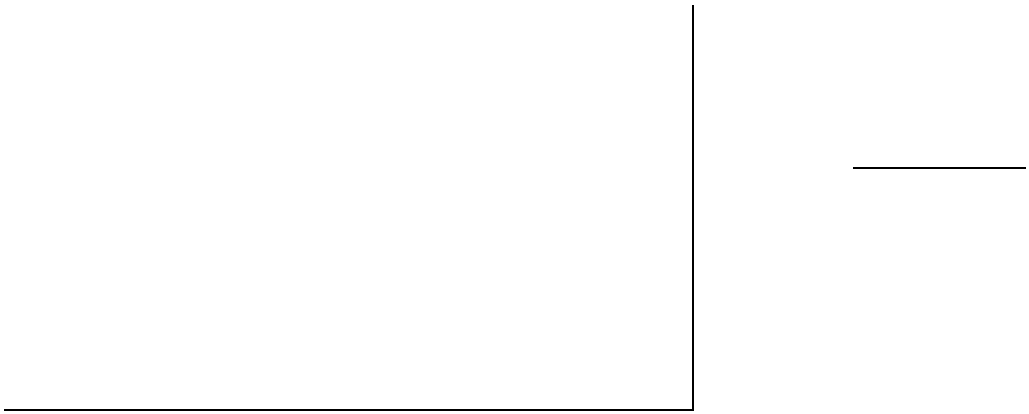


1
2
3
4



1 and 57b. Defendant has waived service of the summons and the Complaint. Plaintiff and Defendant
2 stipulate to the entry of this Stipulated Order for Civil Penalties, Permanent Injunction, and Other Relief

3 ~~20180101~~ in dispute in this action between them.

4 THEREFORE, IT IS ORDERED as follows:

5 **FINDINGS**

6 1. This Court has jurisdiction over this matter.

7
8 2. The Complaint states a claim upon which relief may be granted against Defendant under
9 Sections 9(a) and 9(b) of the Fair ~~WRD F R Q W D F V Z K O L I F Q V 6 W R D U W H R U) H G H U D O O~~

10 7608(a) and (b), and Sections 5(a)(1), 5(m)(1)(A), 13(b), 16(a), and 19(a)(1) of the Federal Trade

11 ~~R P P R E S E R V E S I D E O~~

12 3. Defendant neither admits nor denies any of the allegations in the Complaint, except as
13 specifically stated in this Order. Only for purposes of this action, Defendant admits the facts necessary
14 to establish jurisdiction.

15 4. Defendant waives any claim that he may have under the Equal Access to Justice Act, 28
16 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agrees to
17 bear his own costs and attorney fees.

18 5. Defendant and Plaintiff waive all rights to appeal or otherwise challenge or contest the
19 validity of this Order.
20

21 **ORDER**

22 **DEFINITIONS**

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

24 1. ³~~Contactlens~~ ~~P B D Q~~ F R Q W D F V Z K O L I F Q V 6 W R D U W H R U) H G H U D O O
25 prescription.

26
27 2. ³**Defendant** means Lawrence L. Duskin, individually, and also doing business as
28 HollywoodColorContacts.com, WorldColorContacts.com, TopModelContacts.com, and any

||

|

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11

- 1 A. Accounting records showing the revenues from all goods or services sold;
- 2 B. Personnel records showing, for each person providing services, whether as an employee or
- 3 ~~REDACTED~~ sition; dates
- 4 of service; and (if applicable) the reason for termination;
- 5 C. Records of all consumer complaints and refund requests concerning the subject matter of
- 6 the Order, whether received directly or indirectly, such as through a third party, and any
- 7 response;
- 8 D. Copies of all unique sales scripts, training materials, advertisements, or other marketing
- 9 materials for contact lenses; and
- 10 E. All records necessary to demonstrate full compliance with each provision of this Order,
- 11 including all submissions to the Commission.
- 12
- 13

VII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED ~~REDACTED~~

Z L W K

16 this Order:

- 17 A. Within 14 days of receipt of a written request from a representative of the Commission or
- 18 Plaintiff, Defendant must: submit additional compliance reports or other requested
- 19 information, which must be sworn under penalty of perjury; appear for depositions; and
- 20 produce documents for inspection and copying. (swor)4 (n /Cich must)-25.02 460.75 792 reW*hol
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1 Defendant who has agreed to such an interview. The person interviewed may have counsel
2 present.

3 C. The Commission and Plaintiff (om)-3 (a)0((om)-q0 0 612 792 reW*nBT0 g/TT0 1 Tf12 0 0 12 135
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **SO STIPULATED AND AGREED:**

2
3 **FOR PLAINTIFF UNITED STATES OF**
4 **AMERICA:**

5 _____ JOSEPH H. HUNT

6
7
8
9
10 _____

11
12
13 _____

14
15
16
17 _____

18
19
20
21
22
23
24
25
26
27
28