

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CONSUMER ALLIANCE, INC., a
Delaware corporation,

CONSUMER ALLIANCE, INC., a/k/a 1421914
Ontario Inc., a Canadian corporation,

BIOSOURCE FINANCIAL, INC., a
Canadian corporation,

STEVEN WINTER, individually and as
an officer and director of the corporate
defendants,

GORDON LEVOY, individually and as an officer
and director of the corporate defendants,

JASON C. WILLIAMS, individually and as an
officer of the corporate defendants, and

DANNY LONGO, individually and as an
officer of the corporate defendants,

Defendants.

Civil Action No. 02-C-2429

Judge Guzman

BOOKETED
MAY 20 2004

**STIPULATED ORDER AS TO REDRESS AGAINST DEFENDANTS BIOSOURCE
FINANCIAL, INC., GORDON LEVOY, JASON C. WILLIAMS, AND DANNY LONGO**

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), commenced this action by filing its Complaint for injunctive and other equitable relief pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, and the Telemarketing and

Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. § 6101 *et seq.*, charging that Defendants Consumer Alliance, Inc., Consumer Alliance, Inc. a/k/a 1421914 Ontario Inc., Biosource Financial, Inc., Steven Winter, Gordon Levoy, Jason C. Williams, and Danny Longo, engaged in deceptive acts or practices in violation of Section 5 of the FTC Act ("FTC Act"), 15 U.S.C. § 45, and the FTC's Telemarketing Sales Rule ("TSR"), 16 C.F.R. Part 310. Pursuant to the Court's Memorandum Opinion and Order of September 29, 2003, and the entry of the Order for Permanent Injunction and Other Relief on October 17, 2003, the Court granted the FTC's motion for summary judgment in part and issued a permanent injunction against all defendants, denying the FTC's motion as to the issue of the appropriate amount of a monetary judgment and redress.

The parties, having been represented by counsel and acting by and through such counsel, have consented to the entry of this Stipulated Order as to Redress Against Defendants Biosource Financial, Inc., Gordon Levoy, Jason C. Williams, and Danny Longo ("Stipulated Order"), without a trial or adjudication of any issue of law or fact herein.

NOW, THEREFORE, the Commission and Defendants Biosource Financial, Inc., Gordon Levoy, Jason C. Williams, and Danny Longo, having requested the Court to enter this Stipulated Order, and the Court having considered the Stipulated Order reached among the parties and for other cause appearing, it is **ORDERED, ADJUDGED, AND DECREED** as follows:

The Defendants Biosource Financial, Inc., Gordon Levoy, Jason C. Williams, and Danny Longo, are liable to pay no additional consumer redress, beyond that already paid in the form of refunds, chargebacks or other credits to consumers, or to the government of Canada pursuant to their plea agreement with the Ontario Court of Justice.

Provided, however, that the Commission's agreement to this Stipulated Order is expressly premised upon the financial condition of Defendants Biosource Financial, Inc., Gordon Levoy, Jason C. Williams, and Danny Longo as represented in their financial statements provided to the Commission, which contain material information upon which the Commission relied in negotiating and agreeing upon this Stipulated Order.

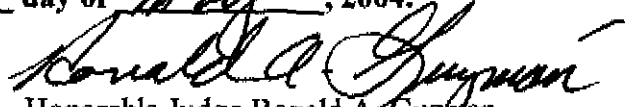
If, upon motion of the Commission, the Court finds that any of the Defendants, Biosource Financial, Inc., Gordon Levoy, Jason C. Williams, and Danny Longo, failed to disclose any material asset, materially misrepresented the value of any asset, or made any other material misrepresentation in or omission from the financial statement, the Court shall enter judgment against such Defendant, in favor of the Commission, in the amount of four million eleven thousand five hundred and ten dollars (USD) (\$4,011,510.00 (USD)) (the minimum total amount of consumer injury in this matter), and the entire amount of the judgment shall become immediately due and payable.

Provided, however, that in all other respects, this Stipulated Order and the Order for Permanent Injunction and Other Relief entered by the Court on October 17, 2003 shall remain in full force and effect, unless otherwise ordered by the Court; and *provided further,* that proceedings instituted under this Section are in addition to, and not in lieu of, any other civil or criminal remedies that may be provided by law, including, but not limited to, contempt proceedings, or any other proceedings that the Commission or the United States might initiate to enforce this Stipulated Order.

There being no just reason for delay, the Clerk of the Court is hereby directed to enter this

Order.

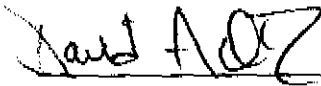
SO ORDERED, this 20 day of May, 2004.


Honorable Judge Ronald A. Guzman

So Stipulated:

WILLIAM E. KOVACIC
General Counsel

DEFENDANTS BIOSOURCE FINANCIAL, INC.,
GORDON LEVOY, JASON C. WILLIAMS, AND
DANNY LONGO



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Attorneys for the Defendants Biosource Financial, Inc.,
Gordon Levoy, Jason C. Williams, and Danny Longo

*Biosource Financial Inc
Gordon Levoy*

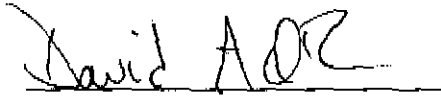
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SO ORDERED, this _____ day of _____, 2004.

Honorable Judge Ronald A. Guzman

So Stipulated:

WILLIAM E. KOVACIC
General Counsel



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Attorney for the Plaintiff

DEFENDANTS BIOSOURCE FINANCIAL, INC.,
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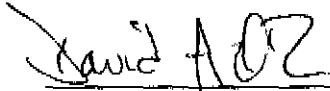
SO ORDERED, this _____ day of _____, 2004.

Honorable Judge Ronald A. Guzman

So Stipulated:

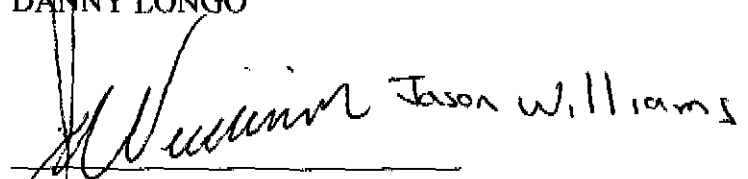
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