

1 WILLIAM E. KOVACIC
General Counsel

2 RAYMOND E. MCKOWN (CA BAR #150975)
3 BARBARA Y. K. CHUN (CA BAR #186907)
Federal Trade Commission
4 10877 Wilshire Boulevard, Suite 700
Los Angeles, California 90024
5 (310) 824-4343 (phone)
(310) 824-4380 (fax)

6 Attorneys for Plaintiff
7 FEDERAL TRADE COMMISSION

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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

2012 AUG - 1 11:54 AM
Clerk of Court
08-02-02

Filed

11 FEDERAL TRADE COMMISSION.

12 Plaintiff,

13 v.

14 SALYON, INC., a California
15 corporation dba First Liberty
16 Financial, Salyon National Credit,
17 Shop Salyon, and Quicklinks.com;

18 MARK JOSEPH LYON, individually and
as an officer of Salyon, Inc.;

19 JOHN DONALD LYON, individually and
20 as an officer of Salyon, Inc.; and

21 KURT CHARLES UHLER, individually
and as a manager of Salyon, Inc.,

22 Defendants.

01019273
CV. 01-8299
ENTERED
CLERK U.S. DISTRICT COURT
AUG 5 2002
CENTRAL DISTRICT OF CALIFORNIA

BY
STIPULATION AND [PROPOSED]
FINAL JUDGMENT AND ORDER
FOR PERMANENT INJUNCTION AS
TO DEFENDANTS SALYON, INC.,
MARK JOSEPH LYON, AND JOHN
DONALD LYON

✓ Basketed
Copies / N/C Sent
JS-6 / JS-6
JS-2 / JS-3
CLSD

24 The summons and complaint having been served on defendants
25 Salyon, Inc., Mark Joseph Lyon, and John Donald Lyon, plaintiff
26 Federal Trade Commission ("Commission") and defendants Salyon,
27 Inc., Mark Lyon, and John Lyon hereby agree to entry of this
28 Final Judgment and Order for Permanent Injunction ("Order") by

28

1 the Court to resolve all matters raised by the Commission's
2 November 29, 2001 complaint, without admission of liability, and
3 without trial or adjudication of any issue of law or fact.

4 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED as follows:

5 **FINDINGS**

6 1. This is an action by plaintiff instituted under Section
7 13(b) of the FTC Act, 15 U.S.C. § 53(b). Plaintiff has the
8 authority to seek the relief contained herein, and the complaint
9 states claims upon which relief may be granted against defendants
10 under Section 5 of the FTC Act, 15 U.S.C. § 45.

11 2. This Court has jurisdiction over the subject matter of
12 this case and all parties thereto. Venue in the Central District
13 of California is proper.

14 3. The activities of defendants are in or affecting
15 commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

16 4. Defendants Salyon, Inc., Mark Joseph Lyon, and John
17 Donald Lyon enter into this Order freely, without admitting
18 liability for any allegation or charge made in the Commission's
19 complaint, without coercion, and acknowledge that they understand
20 the provisions of this Order and are prepared to abide by them.

21 5. The parties shall each bear their own costs and
22 attorney's fees incurred in this action and have waived all
23 claims under the Equal Access to Justice Act, 28 U.S.C. § 2412,
24 and all rights to seek judicial review, or otherwise to challenge
25 the validity of this Order.

26 6. Entry of this Order is in the public interest.

27 **Definitions**

28 1. "Assets" mean any legal or equitable interest in, right

1 to, or claim to, any real and personal property, including but
2 not limited to chattel, goods, instruments, equipment, fixtures,
3 general intangibles, effects, leaseholds, mail or other
4 deliveries, inventory, checks, notes, accounts, available credit,
5 through credit card accounts or otherwise, receivables (as those
6 terms are defined in the Uniform Commercial Code), cash, funds,
7 property, artwork, coins, precious metals, jewelry, contracts, or
8 shares of stock, that are (1) owned or controlled by defendants,
9 in whole or in part; (2) in the actual or constructive possession
10 of defendants; or (3) owned, controlled by, or in the actual or
11 constructive possession of defendants or any other entity that is
12 directly or indirectly owned or controlled by, or under common
13 control with defendants, including, but not limited to, those
14 held by or for defendants in any account at any bank or savings
15 and loan institution, or with any broker-dealer, escrow agent,
16 title company, commodity trading company, precious metal dealer,
17 merchant account processor, or other financial institution of any
18 kind.

19 2. **"Merchant Cards"** mean cards that are typically
20 restricted to use at sources that are owned, controlled, or
21 closely affiliated with the issuing entity, and are accepted at
22 substantially fewer merchants and retail outlets than are credit
23 cards.

24 3. **"Defendants"** mean Salyon, Inc., Mark Joseph Lyon, and
25 John Donald Lyon by whatever names they might be known.

26 I. **PROHIBITION ON SELLING CREDIT CARDS AND MERCHANT CARDS**

27 **IT IS THEREFORE ORDERED** that defendants, as well as their
28 successors, assigns, agents, servants, employees, salespersons,

1 independent contractors, attorneys, and all other persons or
2 entities in active concert or participation with them who receive
3 actual notice of this Order by personal service or otherwise,
4 whether acting directly or through any sole proprietorship,
5 partnership, limited liability company, corporation, subsidiary,
6 branch, division, or other entity, are permanently restrained and
7 enjoined from: (1) receiving any remuneration of any kind
8 whatsoever from any business entity in which any defendant holds
9 more than a 5% ownership interest that engages or participates,
10 in whole or in part, in the marketing or sale of credit cards or
11 merchant cards; or (2) directly or indirectly engaging or
12 participating in the marketing or sale of credit cards or
13 merchant cards while serving as a manager, officer, director,
14 employee, independent contractor, or trustee of any business
15 entity.

16 II. PROHIBITED BUSINESS ACTIVITIES

17 IT IS FURTHER ORDERED that defendants, as well as their
18 successors, assigns, agents, servants, employees, salespersons,
19 independent contractors, attorneys, and all other persons or
20 entities in active concert or participation with them who receive
21 actual notice of this Order by personal service or otherwise,
22 whether acting directly or through any sole proprietorship,
23 partnership, limited liability company, corporation, subsidiary,
24 branch, division, or other entity, are permanently restrained and
25 enjoined from:

26 A. Misrepresenting, expressly or by implication, that any
27 defendant does or will assist consumers in establishing or
28 improving their credit standing by reporting credit histories to

1 entities such as the three major credit bureaus, or by any other
2 means or method;

3 B. Misrepresenting any fact material to a consumer's
4 decision to purchase any product or service sold by any
5 defendant;

6 C. Failing to disclose, clearly and conspicuously, all
7 material conditions and terms of any offer by any defendant to
8 sell any product or service, including those pertaining to any
9 refund or cancellation policies, or the fact that cancellations
10 or refunds are not provided; and

11 D. Collecting additional payments for expedited delivery of
12 products or services to consumers unless the defendant: (1)
13 possesses evidence showing that, typically, prior customers who
14 paid fees for expedited delivery did receive products or services
15 in substantially less time than those who did not pay for
16 expedited delivery; or (2) possesses evidence that provides a
17 reasonable basis to represent that customers who pay expedited
18 delivery fees will receive products or services in less time than
19 those who do not pay for expedited delivery.

20 III. TERMINATION OF ASSET FREEZE

21 IT IS FURTHER ORDERED that the freeze on defendants' assets
22 ordered by this Court shall terminate upon entry of this Final
23 Judgment.

24 IV. COMMISSION'S RELIANCE ON DEFENDANTS' REPRESENTATIONS

25 IT IS FURTHER ORDERED that the Commission's agreement to
26 this Order is expressly premised on the truthfulness, accuracy,
27 and completeness of the financial condition of defendants as
28 represented in their respective financial statements, i.e.,

1 Salyon, Inc. (executed by Mark Lyon on Nov. 22, 2001; executed by
2 John Lyon on Nov. 15, 2001); Mark Lyon (Nov. 22, 2001); John Lyon
3 (Nov. 15, 2001), and related documents listed in Attachment B
4 that were submitted to the Federal Trade Commission. Such
5 financial statements and supporting documents contain material
6 information upon which the Commission relied in negotiating and
7 agreeing to the amount and/or terms of the redress under this
8 Order. If, upon motion by the Commission, this Court finds that
9 any defendant filed a financial statement that failed to disclose
10 any material asset, or materially misrepresented the value of any
11 asset, or made any other material misrepresentation in or
12 omission from the financial statement, the Court shall enter
13 judgment against such defendant, in favor of the Commission, in
14 the amount of \$2.7 million, which is intended to represent the
15 amount of loss to consumers/injured parties, and which will
16 become immediately due and payable. For purposes of this Section
17 and any subsequent proceedings to enforce payment, including but
18 not limited to a non-dischargeability complaint filed in
19 bankruptcy proceedings, defendants waive any right to contest any
20 of the allegations in the Commission's complaint.

21 **V. ADMINISTRATION OF REDRESS**

22 **IT IS FURTHER ORDERED** that:

23 A. All funds paid pursuant to this Order shall be deposited
24 into a fund administered by the Commission or its agent to be
25 used for equitable relief, including but not limited to consumer
26 redress and any attendant expense for the administration of any
27 redress fund. In the event that direct redress to consumers is
28 wholly or partially impracticable or funds remain after redress

1 is completed, the Commission may apply any remaining funds for
2 such other equitable relief (including consumer information
3 remedies) as it determines to be reasonably related to the
4 defendants' practices alleged in the complaint. Any funds not
5 used for such equitable relief shall be deposited to the Treasury
6 as disgorgement. Defendants shall have no right to challenge the
7 Commission's choice of remedies under this Section;

8 B. If an administrator is employed to administer redress,
9 such administrator may destroy all records relating to this
10 matter six years after the transfer of any remaining redress
11 funds to the FTC Treasury account or the closing of the account
12 from which such funds were disbursed, whichever is earlier,
13 provided that no records shall be destroyed unless and until a
14 representative of the Commission has received and approved the
15 administrator's final accounting report. Records shall be
16 destroyed in accordance with disposal methods and procedures to
17 be specified by the Commission. The Commission may, in its sole
18 discretion, require that such records, in whole or in part, be
19 transferred, in lieu of destruction, to the Commission;

20 C. Defendants forever disclaim all right, title, and
21 interest in all sums paid. None of these funds shall be returned
22 to the defendants, their successors, heirs, or assigns. No
23 portion of any payments under the judgment herein shall be deemed
24 a payment of any fine, penalty, or punitive assessment;

25 D. Unless previously provided to the FTC, defendants are
26 hereby required, in accordance with 31 U.S.C. § 7701, to furnish
27 to the FTC their respective taxpayer identifying numbers (social
28 security numbers or employer identification numbers), which shall

1 be used for purposes of collecting and reporting on any
2 delinquent amount arising out of such persons' relationship with
3 the government; and

4 E. Proceedings instituted under this Section are in
5 addition to, and not in lieu of, any other civil or criminal
6 remedies that may be provided by law, including any other
7 proceedings the Commission may initiate to enforce this Order.

8 VI. CUSTOMER LISTS

9 IT IS FURTHER ORDERED that defendants, as well as their
10 successors, assigns, agents, servants, employees, salespersons,
11 independent contractors, attorneys, and all other persons or
12 entities in active concert or participation with them who receive
13 actual notice of this Order by personal service or otherwise,
14 whether acting directly or through any sole proprietorship,
15 partnership, limited liability company, corporation, subsidiary,
16 branch, division, or other entity, are hereby permanently
17 restrained and enjoined from selling, renting, leasing,
18 transferring, or otherwise disclosing the name, address,
19 telephone number, social security number, bank account number, or
20 other identifying information of any person who paid money to
21 defendants or Kurt Charles Uhler, who was solicited to pay money
22 to defendants or Kurt Charles Uhler, or whose identifying
23 information was obtained for the purpose of soliciting them to
24 pay money to defendants or Kurt Charles Uhler at any time prior
25 to the date this Order is entered, in connection with the sale of
26 the products or services referenced in the complaint; provided,
27 however, that defendants may disclose such identifying
28 information to a law enforcement agency or as required by any

1 law, regulation, or court order.

2 **VII. ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANT**

3 **IT IS FURTHER ORDERED** that, within five business days after
4 receipt by defendants of this Order as entered by the Court, each
5 defendant shall submit to plaintiff a truthful sworn statement,
6 in the form shown on Attachment A, that shall acknowledge receipt
7 of this Order and the truthfulness of the defendant's financial
8 statement.

9 **VIII. COMMISSION'S AUTHORITY TO MONITOR COMPLIANCE**

10 **IT IS FURTHER ORDERED** that the Commission is authorized to
11 monitor defendants' compliance with this Order by all lawful
12 means, including but not limited to the following:

13 A. The Commission is authorized, without further leave of
14 the Court, to obtain discovery from any person in the manner
15 provided by Chapter V of the Federal Rules of Civil Procedure,
16 Fed. R. Civ. P. 26 - 37, including the use of compulsory process
17 pursuant to Fed. R. Civ. P. 45, to monitor and investigate
18 defendants' compliance with any provision of this Order;

19 B. The Commission is authorized to use representatives
20 posing as consumers or suppliers to defendants, their employees,
21 or any other entity managed or controlled in whole or in part by
22 defendants, without the necessity of identification or prior
23 notice; and

24 C. Nothing in this Order shall limit the Commission's
25 lawful use of compulsory process, pursuant to Sections 9 and 20
26 of the FTC Act, 15 U.S.C. §§ 49, 57b-1, to investigate whether
27 defendants have violated any provision of this Order or Section 5
28 of the FTC Act.

IX. COMPLIANCE REPORTING BY DEFENDANTS

IT IS FURTHER ORDERED that, in order that compliance with the provisions of this Order may be monitored:

A. For a period of five years from the date of entry of this Order, each individual defendant shall notify the Commission of the following:

1. Any changes in residence, mailing addresses, and telephone numbers, within ten days of the date of such change;

2. Any changes in employment status (including self-employment) within ten days of such change. Such notice shall include the name and address of each business that defendants are affiliated with or employed by, a statement of the nature of the business, and a statement of the defendant's duties and responsibilities in connection with the business or employment; and

3. Any proposed change in the structure of any business entity owned or controlled by defendants, such as creation, incorporation, dissolution, assignment, sale, merger, creation or dissolution of subsidiaries, proposed filing of a bankruptcy petition, or change in the corporate name or address, or any other change that may affect compliance obligations arising out of this Order, thirty days prior to the effective date of any proposed change;

B. One hundred eighty days after the date of entry of this Order, each individual defendant shall provide a written report

1 to the Commission, sworn to under penalty of perjury, setting
2 forth in detail the manner and form in which they have complied
3 and are complying with this Order. This report shall include but
4 not be limited to:

- 5 1. Their then current residence addresses and
6 telephone numbers;
- 7 2. Their then current employment, business addresses
8 and telephone numbers, a description of the business
9 activities of each such employer, and the defendant's
10 title and responsibilities for each employer;
- 11 3. A copy of each acknowledgment of receipt of this
12 Order obtained by defendants pursuant to Section X,
13 below;
- 14 4. A statement describing the manner in which
15 defendants have complied and are complying with
16 Sections I and II of this Order;

17 C. Upon written request by a representative of the
18 Commission, defendants shall submit additional written reports
19 (under oath, if requested) and produce documents on fifteen days'
20 notice with respect to any conduct subject to this Order;

21 D. For the purposes of this Order, defendants shall,
22 unless otherwise directed by the Commission's authorized
23 representatives, mail all written notifications to the Commission
24 to:

25 Assistant Regional Director, Western Region
26 Federal Trade Commission
27 10877 Wilshire Blvd., Suite 700
28 Los Angeles, California 90024
Re: FTC v. Salyon

or such other address as the Commission shall designate in

1 writing;

2 E. For the purposes of this Section, "employment" includes
3 the performance of services as an employee, consultant, or
4 independent contractor; and "employers" include any individual or
5 entity for whom defendants perform services as an employee,
6 consultant, or independent contractor; and

7 F. For purposes of the compliance reporting required by
8 this Section, the Commission is authorized to communicate
9 directly with defendants Salyon, Inc., Mark Joseph Lyon, and John
10 Donald Lyon, or such other person or attorney designated in
11 writing by such defendant.

12 **X. DISTRIBUTION OF ORDER BY DEFENDANTS**

13 IT IS FURTHER ORDERED that, for a period of five years from
14 the date of entry of this Order, defendants, as well as their
15 successors, assigns, agents, servants, employees, salespersons,
16 independent contractors, attorneys, and all other persons or
17 entities in active concert or participation with them who receive
18 actual notice of this Order by personal service or otherwise,
19 whether acting directly or through any sole proprietorship,
20 partnership, limited liability company, corporation, subsidiary,
21 branch, division, or other entity, shall:

22 A. Provide a copy of this Order to, and obtain a signed
23 and dated acknowledgment of receipt of same from: co-shareholders
24 of closely held corporations, all partners, co-owners of limited
25 liability companies, or joint venturer, each officer or director,
26 each individual serving in a management capacity, all entities
27 involved in responding to consumer complaints or inquiries, and
28 all sales entities, whether designated as employees, consultants,

1 independent contractors or otherwise, immediately upon employing,
2 retaining, or contracting with any such entity, for any business
3 where defendant is the majority owner of the business or
4 directly, indirectly, or in concert with others controls the
5 business; and

6 B. Maintain for a period of three years after creation,
7 and upon reasonable notice, make available to representatives of
8 the Commission, the original signed and dated acknowledgments of
9 the receipt of copies of this Order, as required in Subsection A,
10 of this Section.

11 **XI. ACCESS TO BUSINESS PREMISES**

12 **IT IS FURTHER ORDERED** that, for a period of five years from
13 the date of entry of this Order, for the purpose of further
14 determining compliance with this Order, defendants shall permit
15 representatives of the Commission, within three business days of
16 receipt of written notice from the Commission:

17 A. Access during normal business hours to any office, or
18 facility storing documents, for any business where any defendant
19 is the majority owner of the business or directly or indirectly
20 controls the business. In providing such access, defendants
21 shall permit representatives of the Commission to inspect and
22 copy all documents relevant to any matter contained in this
23 Order; and shall permit Commission representatives to remove
24 documents relevant to any matter contained in this Order for a
25 period not to exceed five business days so that the documents may
26 be inspected, inventoried, and copied; and

27 B. To interview the officers, directors, and employees,
28 including all personnel involved in responding to consumer

1 complaints or inquiries, and all sales personnel, whether
2 designated as employees, consultants, independent contractors or
3 otherwise, of any business to which Subsection A of this Section
4 applies, concerning matters relating to compliance with the terms
5 of this Order. The person interviewed may have counsel present.

6 Provided that, upon application of the Commission and for
7 good cause shown, the Court may enter an ex parte order granting
8 immediate access to defendants' business premises for the
9 purposes of inspecting and copying all documents relevant to any
10 matter contained in this Order.

11 XIII. RECORD KEEPING PROVISIONS

12 **IT IS FURTHER ORDERED** that, for a period of eight years from
13 the date of entry of this Order, in connection with any business
14 where any defendant is the majority owner of the business or
15 directly or indirectly controls the business, defendants and
16 their successors, assigns, agents, servants, employees,
17 salespersons, independent contractors, attorneys, and all other
18 persons or entities in active concert or participation with them
19 who receive actual notice of this Order by personal service or
20 otherwise, whether acting directly or through any sole
21 proprietorship, partnership, limited liability company,
22 corporation, subsidiary, branch, division, or other entity, are
23 hereby restrained and enjoined from failing to create and retain
24 the following records:

- 25 A. Accounting records that reflect the cost of goods or
26 services sold, revenues generated, and the disbursement
27 of such revenues;
- 28 B. Personnel records accurately reflecting: the name,

1 address, and telephone number of each person employed
2 in any capacity by such business, including as an
3 independent contractor; that person's job title or
4 position; the date upon which the person commenced
5 work; and the date and reason for the person's
6 termination, if applicable;

7 C. Customer files containing the names, addresses, phone
8 numbers, dollar amounts paid, quantity of items or
9 services purchased, and description of items or
10 services purchased, to the extent such information is
11 obtained in the ordinary course of business;

12 D. Complaint and refund requests (whether received
13 directly, indirectly or through any third party) and
14 any responses to those complaints or requests; and

15 E. Copies of all sales scripts, training materials,
16 advertisements, or other marketing materials.

17 XIII. SERVICE OF ORDER

18 IT IS FURTHER ORDERED that plaintiff's attorneys, agents, or
19 employees may serve this Order upon any financial institution, or
20 other entity or person that may have possession, custody,
21 control, or knowledge of any assets of defendants, or any other
22 entity or person that may be otherwise subject to any provision
23 of this Order, by delivering a copy of the Order by any means,
24 including facsimile transmission, to any office, branch, or
25 location.

26 XIV. RECEIVERSHIP ACTIONS

27 IT IS FURTHER ORDERED that all entities are hereby
28 permanently enjoined from filing or otherwise commencing in any

1 court other than this one any suit, action, or other proceeding
2 directed against the Receiver arising from or related to any acts
3 undertaken or omissions made by the Receiver in the course of
4 administering the receivership estate in this case.

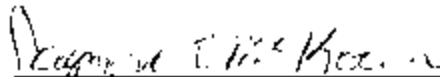
5 **XV. RETENTION OF JURISDICTION**

6 IT IS FURTHER ORDERED that this Court shall retain
7 jurisdiction of this matter for all purposes. ^{for 180 days}

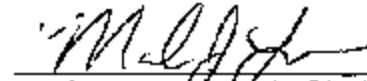
8 Defendants and the Commission through its counsel, hereby
9 consent to the terms and conditions of this Order as set forth
10 above and consent to the entry thereof. Defendants waive any
11 rights that may arise under the Equal Access to Justice Act, 28
12 U.S.C. § 2412.

13 **SO STIPULATED:**

14 Dated: 7-31-2002


Raymond E. McKown
Barbara Y. K. Chun
Attorneys for Plaintiff
Federal Trade Commission

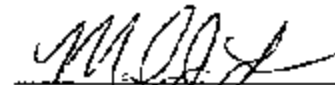
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18 Dated: 5-1-02


Mark J. Lyon, individually and
as an officer of Salyon, Inc.

19
20 Dated:

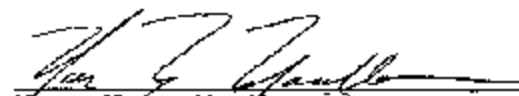
John D. Lyon, individually and
as an officer of Salyon, Inc.

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22
23 Dated: 5-1-02


Salyon, Inc., by its
President, Mark J. Lyon

24
25 **IT IS SO ORDERED.**

26 Dated: 8/2/02


Hon. Nora M. Manella
United States District Judge

1 court other than this one any suit, action, or other proceeding
2 directed against the Receiver arising from or related to any acts
3 undertaken or omissions made by the Receiver in the course of
4 administering the receivership estate in this case.

5 **XV. RETENTION OF JURISDICTION**

6 **IT IS FURTHER ORDERED** that this Court shall retain
7 jurisdiction of this matter for all purposes.

8 Defendants and the Commission through its counsel, hereby
9 consent to the terms and conditions of this Order as set forth
10 above and consent to the entry thereof. Defendants waive any
11 rights that may arise under the Equal Access to Justice Act, 28
12 U.S.C. § 2412.

13 **SO STIPULATED:**

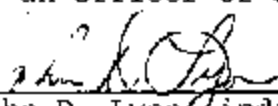
14 Dated:

15 Raymond E. McKown
16 Barbara Y. K. Chun
17 Attorneys for Plaintiff
Federal Trade Commission

18 Dated:

19 Mark J. Lyon, individually and
as an officer of Salyon, Inc.

20 Dated:

21 
22 John D. Lyon, individually and
as an officer of Salyon, Inc.

23 Dated:

24 Salyon, Inc., by its
President, Mark J. Lyon

25 **IT IS SO ORDERED.**

26 Dated:

27 Hon. Nora M. Manella
28 United States District Judge

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ATTACHMENT A
UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SALYON, INC., a California corporation dba First Liberty Financial, Salyon National Credit, Shop Salyon, and Quicklinks.com;

MARK JOSEPH LYON, individually and as an officer of Salyon, Inc.;

JOHN DONALD LYON, individually and as an officer of Salyon, Inc.; and

KURT CHARLES UHLER, individually and as a manager of Salyon, Inc.,

Defendants.

CV. 01-9273 NM(Ex)

**AFFIDAVIT OF DEFENDANT
ACKNOWLEDGING RECEIPT OF
SIGNED ORDER AND REAFFIRMING
FINANCIAL STATEMENT**

I, _____ [name] _____, being duly sworn, hereby state and affirm as follows:

1. My name is _____. My current residence address is _____ I am a citizen of the United States and am over the age of eighteen. I have personal knowledge of the facts set forth in this Affidavit.

2. I am a defendant in FTC v. SALYON, INC., et al. Civil No. 01-9273 NM(Ex) (United States District Court for the Central District of California).

3. On _____ [date] _____, I received a copy of the Stipulated

1 Final Judgment and Order for Permanent Injunction ("Order"),
2 which was signed by the Honorable Nora Manella and entered by the
3 Court on ____ [date] _____. A true and correct copy of the Order I
4 received is appended to this Affidavit. I have read the signed
5 Order.

6 4. I hereby state that the information contained in the
7 financial statement I signed on ____ [date] ____, was true, accurate,
8 and complete at the time that I signed it.

9 I declare under penalty of perjury under the laws of the United
10 States that the foregoing is true and correct. Executed on
11 ____ [date] ____, at ____ [city, state] ____.

12 _____
13 _____
14 [Defendant]

15 _____
16 _____
17 State of _____, City of _____.

18 _____
19 Subscribed and sworn to before me
20 _____
21 this ____ day of _____, 2001.

22 _____
23 _____
24 Notary Public
25 My Commission Expires:
26 _____
27 _____
28 _____

ATTACHMENT B

1. 1999 Salyon, Inc., dba Quicklinks.com Federal Income Tax Return (15 pages);
2. 1999 California Corporation Franchise or Income Tax Return (14 pages);
3. 1999 Annual Summary and Transmittal of US Information Returns for Salyon, Inc., Quicklinks.com (2 pages);
4. 2000 Salyon Inc. dba Quicklinks.com Federal Income Tax Return (15 pages);
5. 2000 California Corporation Franchise or Income Tax Return (19 pages);
6. 2000 US Individual Income Tax Return for Mark J. Lyon (9 pages);
7. 2000 California Resident Income Tax Return 2000 for Mark J. Lyon (5 pages);
8. Transcript of the deposition taken of Mark J. Lyon on Dec. 11, 2001, by the Federal Trade Commission.

CERTIFICATE OF SERVICE

My name is Raymond E. McKown. I am an attorney employed by the Federal Trade Commission, 10877 Wilshire Boulevard, Suite 700, Los Angeles, California 90024. On 7-31, 2002, I placed the document captioned: "STIPULATION AND [PROPOSED] FINAL JUDGMENT AND ORDER FOR PERMANENT INJUNCTION AS TO DEFENDANTS SALYON, INC., MARK JOSEPH LYON, AND JOHN DONALD LYON," in the first class United States mail, postage prepaid, addressed to the following:

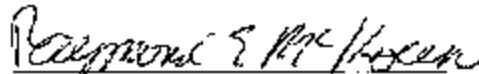
Lee O' Connor
O'Connor, Schmeltzer & Rose
8001 Irvine Center Drive, #1550
Irvine, CA 92718-2953
Attorney for Defendant Kurt C. Uhler

Mark J. Lyon
26895 Aliso Creek Road, Suite B-324
Aliso Viejo, CA 92656
Defendant (in pro per)

John D. Lyon
13347 West Wittenburg
Boise, Idaho 83713
Defendant (in pro per)

Rita M. Haeusler
Hughes, Hubbard & Reed
350 South Grand Ave., 36th Floor
Los Angeles, CA 90071
Receiver for Salyon, Inc.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of July 2002, at Los Angeles, California.


Raymond E. McKown