

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

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	Civil Action No. 03 C 0977
)	
v.)	Judge James B. Zagel
)	
STF GROUP INC., <i>et al.</i> ,)	Magistrate Judge Bobrick
)	
Defendants.)	
)	

**STIPULATED FINAL JUDGMENT AND ORDER FOR
PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), commenced this action by filing its Complaint for Injunctive and Other Equitable Relief (“Complaint”) 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 the Defendants engaged in unfair and deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the FTC’s Trade Regulation Rule entitled “Telemarketing Sales Rule,” 16 C.F.R. Part 310. The Court granted the *Ex Parte* Motion for a Temporary Restraining Order and Other Relief, filed by the Commission, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, and subsequently entered the Stipulated Order for Preliminary Injunction with Asset Freeze and Other Equitable Relief.

The parties, having been represented by counsel and acting by and through such counsel, have consented to the entry of this Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief ("Order"), as a final judgment in this matter, without a trial or adjudication of any issue of law or fact herein.

NOW, THEREFORE, the Commission and Defendants, having requested the Court to enter this Order, and the Court having considered the Order stipulated to by the parties and for other cause appearing, it is **ORDERED, ADJUDGED, AND DECREED** as follows:

FINDINGS

1. This is an action by the Commission instituted under Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, the Telemarketing Act, 15 U.S.C. §§ 6101, *et seq.*, and the FTC's Telemarketing Sales Rule, 16 C.F.R. Part 310. Pursuant to these statutes and regulations, the Commission has the authority to seek the relief contained herein.
2. The Commission's Complaint states a claim upon which relief may be granted against Defendants under Sections 5, 13(b), and 19 of the FTC Act, 15 U.S.C. §§ 45, 53(b) and 57b, the Telemarketing Act, 15 U.S.C. §§ 6101, *et seq.*, and the FTC's Telemarketing Sales Rule, 16 C.F.R. Part 310.
3. This Court has jurisdiction over the subject matter and the parties in this case.
4. Venue, process and service of process are proper.
5. The alleged activities of Defendants are in or affecting commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

6. Plaintiff and Defendants, by and through counsel, have agreed that the entry of this Order resolves all matters of dispute between them arising from the Complaint in this action, up to the date of entry of this Order.

7. Defendants deny liability for any of the actions alleged in the Complaint, and this Order does not constitute, and shall not be interpreted to constitute, either an admission by the Defendants of any wrongdoing or a finding by the Court that the Defendants have engaged in any violation of law.

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

9. Entry of this Order is in the public interest.

DEFINITIONS

For purposes of this Order, the following definitions shall apply:

1. "Plaintiff" means the Federal Trade Commission.
2. "Defendants" means STF Group Inc.; STF Group; STF Group (Burlington); STF Group (Newmarket); Start to Finish Consulting Group, Inc.; Start to Finish Consulting Group; Start to Finish Marketing, Inc.; 1363883 Ontario Limited, d/b/a STF Consolidated; Q-Prompt, Inc.; 487948 Ontario Limited; 1363942 Ontario Limited, d/b/a National Credit Card Security Centre; Korn Land Corporation, d/b/a National Credit Card Security; Med Plan, Inc., d/b/a First Med, Inc.; Medical Discount Inc.; Medplan Burlington; Medplan Mississauga; Medplan Newmarket; Medplan North York; Medplan Scollard; Chembe Management, Inc., d/b/a Medplan Scarborough; Great Sailing Management Inc.; Thunderchild Consulting Inc.; SMAKK

Consulting Inc.; GTCQ, Inc.; Global Discount Healthcare Benefits, d/b/a Global Discount Healthcare Benefits, Inc. and First Med, Inc.; 1108114 Ontario Inc.; 1349927 Ontario Inc.; Alex Korn, individually and as an officer and director of the corporate Defendants; Allan Shiell, individually and as an officer and director of the corporate Defendants; Sean Zaichick, individually and as an officer and director of the corporate Defendants; Julian Shiell, individually and as an officer and director of the corporate Defendants; Chris Quilliam, individually and as an officer and director of the corporate Defendants; and Nicholas Bridges, individually and as an officer and director of the corporate Defendants; and each of them, by whatever names each may be known.

3. "Asset" or "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including, but not limited to, "goods," "instruments," "equipment," "fixtures," "general intangibles," "inventory," "checks," or "notes" (as these terms are defined in the Uniform Commercial Code), lines of credit, chattels, leaseholds, contracts, mail or other deliveries, shares of stock, lists of consumer names, accounts, credits, premises, receivables, funds, and all cash, wherever located.

4. "Assisting others" means: (1) performing customer service functions including, but not limited to, receiving or responding to consumer complaints, receiving identifying and financial information from consumers, or communicating with consumers about extensions of credit; (2) developing, providing, or arranging for the development or provision of sales scripts or any other marketing material; (3) providing names of, or arranging for the provision of names of, potential customers; or (4) performing marketing services of any kind.

5. "Consumer" means any individual, group, unincorporated association, limited or general partnership, corporation or other business entity.

6. "Customer" means any person who has paid, or may be required to pay, for goods or services.

7. "Document" or "Documents" means any materials listed in Federal Rule of Civil Procedure 34(a) and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and other data compilations from which information can be obtained and translated, if necessary, into reasonably usable form through detection devices. A draft or nonidentical copy is a separate Document within the meaning of the term.

8. "Credit Card Protection" means the advertisement, promotion, offering for sale, or sale of any product or service represented to register credit or debit accounts, including credit card accounts, or protect, indemnify, or reimburse the holder of a credit or debit account against unauthorized use or charges.

9. "Healthcare Discount Plan" means the advertisement, promotion, offering for sale, or sale of any product or service represented to allow a consumer to receive discounts on medical, dental, optical or other health-related services, or prescription drugs.

10. "Telemarketing" means any plan, program or campaign (whether or not covered by the Telemarketing Sales Rule, 16 C.F.R. Part 310) that is conducted to induce the purchase of goods or services, or the payment of money, by means of the use of one or more telephones.

ORDER

I. CEASE AND DESIST

IT IS ORDERED that Defendants, and their officers, directors, agents, servants, employees, salespersons, independent contractors, corporations, subsidiaries, affiliates, successors, and assigns, and all other persons or entities in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, or any of them, in connection with the telemarketing, marketing, advertising, proposed sale, or sale of any product or service, are permanently restrained and enjoined from:

A. making, or assisting others in the making of, expressly or by implication, orally or in any writing, any false or misleading statement or representation of material fact, including, but not limited to, any false or misleading representation:

1. that Defendants are affiliated with, are calling from, or are calling on behalf of Visa, MasterCard, or the consumer's credit card issuer;

2. that, if consumers do not purchase Defendants' services, consumers can be held fully liable for any unauthorized charges made to their credit card accounts;

3. that consumers who agree to purchase goods or services from Defendants will be charged the amount specified in the sales calls;

4. that consumers will have a trial period before being charged by Defendants;

5. that consumers can readily obtain refunds upon request; or

6. regarding any fact material to a consumer's decision to purchase or use any good or service;

B. charging or debiting consumers' credit cards, debit cards or bank accounts without authorization;

C. violating any provision of the Telemarketing Sales Rule, 16 C.F.R. Part 310, including, but not limited to, the prohibition against causing billing information to be submitted for payment, or collecting or attempting to collect payment for goods or services, directly or indirectly, without the customer's express verifiable authorization, as set forth in 16 C.F.R. § 310.3(a)(3), and the prohibition against making a false or misleading statement to induce any person to pay for goods or services, as set forth in 16 C.F.R. § 310.3(a)(4); and

D. assisting others who violate any provision of Subsections A through C of this Section.

II. CONSUMER REDRESS

IT IS FURTHER ORDERED that:

A. Judgment is hereby entered in favor of Plaintiff, and against Defendants, jointly and severally, in the amount of Fourteen Million Dollars (\$14,000,000.00), in United States currency; *provided, however*, that upon the fulfillment of the payment obligations of Section II.B and Section II.C of this Order, this judgment shall be suspended until further order of this Court; *and provided further* that this judgment shall be subject to the conditions set forth in Section III of this Order.

B. Defendants shall be jointly and severally liable for payment of equitable monetary relief, including, but not limited to, consumer redress and/or disgorgement, in the amount of two

hundred thousand dollars (\$200,000.00), in United States currency. Within fourteen (14) days of receipt of notice of entry of this Order, Defendants' counsel shall wire transfer the entire sum to the Commission or its agents or representatives, in accordance with directions provided by the Commission.

C. Time is of the essence for the payment specified above. In the event that Defendants do not fulfill, or only partially fulfill, the payment obligations set forth above in Section II.B, Defendants shall be immediately liable for payment of Fourteen Million Dollars (\$14,000,000.00), in United States currency, which is the entire amount of the judgment, plus interest computed pursuant to 28 U.S.C. § 1961, as amended, less any payments already made.

D. All funds paid pursuant to this Section or Section III shall be deposited into a fund administered by the Commission or its agent to be used for equitable relief, including, but not limited to, consumer redress and any attendant expenses for the administration of any redress fund. If the Commission determines, in its sole discretion, that redress to consumers is wholly or partially impracticable or funds remain after redress is completed, the Commission may apply any remaining funds for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to the practices alleged in the Complaint. Any funds not used for such equitable relief shall be deposited to the United States Treasury as disgorgement. Defendants shall have no right to challenge the Commission's choice of remedies under this Paragraph. The Commission and Defendants acknowledge and agree that this judgment for equitable monetary relief is solely remedial in nature and is not a fine, penalty, punitive assessment, or forfeiture.

E. In accordance with 31 U.S.C. § 7701, Defendants are hereby required, unless they already have done so, to furnish to the Commission their respective taxpayer identifying numbers (social insurance numbers or employer identification numbers), which shall be used for purposes of collecting and reporting on any delinquent amount arising out of Defendants' relationship with the Commission. Defendants Alex Korn, Allan Shiell, Sean Zaichick, Julian Shiell, Chris Quilliam, and Nicholas Bridges are further required to provide the Commission with clear, legible and full-size photocopies of all valid driver's licenses that they possess, which will be used for reporting and compliance purposes.

F. As stated above in Paragraph 7 of the Findings, Defendants deny liability for any of the actions alleged in the Complaint; however, Defendants agree that, in the event of any subsequent proceedings or litigation to enforce this Order or to collect amounts due pursuant to this Section or Section III, including, but not limited to, a nondischargeability complaint in any bankruptcy case, the facts as alleged in the Complaint filed in this action shall be taken as true, without further proof.

G. 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 any other proceedings the Commission may initiate to enforce this Order.

III. RIGHT TO REOPEN

IT IS FURTHER ORDERED that:

A. The Commission's agreement to and the Court's approval of this Order are expressly premised upon the truthfulness, accuracy, and completeness of the financial statements, dated May 1, 2003 (Allan Shiell, Chris Quilliam), May 12, 2003 (Sean Zaichick, Julian Shiell),

May 15, 2003 (Alex Korn), and February 23, 2006 (Nicholas Bridges), and accompanying attachments and information, that Defendants provided to the Commission, and Defendants' testimony regarding their assets at their depositions in this case, which contain material information relied upon by the Commission in negotiating and agreeing to the terms of this Order.

B. If the Commission should have evidence that the above-referenced financial statements, accompanying attachments and information, or deposition testimony failed to disclose any material asset, materially misrepresented the value of any asset, or made any other material misrepresentation or omission, the Commission may move that the Court reopen this Order for the sole purpose of allowing the Commission to modify the monetary liability of Defendants. If the Court finds that any Defendant failed to disclose any material asset, materially misrepresented the value of any asset, or made any other material misrepresentation or omission in the above-referenced financial statements, information, or testimony, the Court shall reinstate the suspended judgment against such Defendant, in favor of the Commission, in the amount of Fourteen Million Dollars (\$14,000,000.00), in United States currency. *Provided, however,* that in all other respects this Order shall remain in full force and effect unless otherwise ordered by the Court. Any proceedings instituted under this Paragraph shall be in addition to and not in lieu of any other proceedings the Commission may initiate to enforce this Order. For the purposes of reopening or enforcing this Paragraph, Defendants waive any right to contest any of the allegations set forth in the Complaint filed in this matter.

IV. CUSTOMER LISTS

IT IS FURTHER ORDERED that Defendants, and their officers, directors, agents, servants, employees, salespersons, independent contractors, corporations, subsidiaries, affiliates, successors, and assigns, and all other persons or entities in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, or any of them, are permanently restrained and enjoined from selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, credit card number, bank account number, e-mail address, or other identifying information of any person who paid any money to any Defendant, at any time prior to entry of this Order, in connection with the telemarketing or sale of any product or service related to Credit Card Protection or a Healthcare Discount Plan. *Provided, however,* that Defendants may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

V. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring and investigating compliance with any provision of this Order:

A. Within fifteen (15) days of receipt of written notice from a representative of the Commission, Defendants each shall submit additional written reports, sworn to under penalty of perjury; produce documents for inspection and copying; appear for deposition; and/or provide entry during normal business hours to any business location in any Defendant's possession or direct or indirect control to inspect the business operation; *provided* that Defendants, after attempting to resolve a dispute without court action and for good cause shown, may file a motion

with this Court seeking an order including one or more of the protections set forth in Fed. R. Civ. P. 26(c);

B. In addition, the Commission is authorized to monitor compliance with this Order by all other lawful means, including, but not limited to, the following:

1. obtaining discovery from any person, without further leave of court, using the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45;
2. posing as consumers and suppliers to: any Defendant, any Defendant's employees, or any other entity managed or controlled in whole or in part by any Defendant, without the necessity of identification or prior notice; and

C. Defendants shall permit representatives of the Commission to interview any employer, consultant, independent contractor, representative, agent, or employee who has agreed to such an interview, relating in any way to any conduct subject to this Order. The person interviewed may have counsel present.

Provided, however, that nothing in this Order shall limit the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1, to obtain any documentary material, tangible things, testimony, or information relevant to unfair or deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C. § 45(a)(1)).

VI. 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 three (3) years from the date of entry of this Order,

1. Defendants Alex Korn, Allan Shiell, Sean Zaichick, Julian Shiell, Chris Quilliam, and Nicholas Bridges each shall notify the Commission of the following:

a. Any changes in residence, mailing addresses, and telephone numbers of Defendant, within ten (10) days of the date of such change;

b. Any changes in employment status (including self-employment) of Defendant, and any change in the ownership of Defendant in any business entity, within ten (10) days of the date of such change. Such notice shall include the name and address of each business that Defendant is affiliated with, employed by, creates or forms, or performs services for; a statement of the nature of the business; and a statement of Defendant's duties and responsibilities in connection with the business or employment; and

c. Any changes in Defendant's name or use of any aliases or fictitious names; and

2. Defendants shall notify the Commission of any changes in corporate structure of STF Group Inc., STF Group, STF Group (Burlington), STF Group (Newmarket), Start to Finish Consulting Group, Inc., Start to Finish Consulting Group, Start to Finish Marketing, Inc., 1363883 Ontario Limited, Q-Prompt, Inc., 487948 Ontario Limited, 1363942 Ontario Limited, Korn Land Corporation, Med Plan, Inc., Medical Discount Inc., Medplan Burlington, Medplan Mississauga, Medplan Newmarket, Medplan North York, Medplan Scollard, Chembe Management, Inc., Great Sailing Management Inc., Thunderchild Consulting Inc., SMAKK Consulting Inc., GTCQ, Inc., Global Discount Healthcare Benefits, 1108114 Ontario Inc., 1349927 Ontario Inc., or any business entity that Alex Korn, Allan Shiell, Sean

Zaichick, Julian Shiell, Chris Quilliam, or Nicholas Bridges directly or indirectly controls, or has an ownership interest in, that may affect compliance obligations arising under this Order, including, but not limited to, a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor entity; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order; the filing of a bankruptcy petition; or a change in the corporate name or address, at least thirty (30) days prior to such change, *provided* that, with respect to any proposed change in the corporation about which Defendant learns less than thirty (30) days prior to the date such action is to take place, Defendant shall notify the Commission as soon as is practicable after obtaining such knowledge.

B. One hundred eighty (180) days after the date of entry of this Order, Defendants each shall provide a written report to the FTC, sworn to under penalty of perjury, setting forth in detail the manner and form in which they have complied and are complying with this Order. This report shall include, but not be limited to:

1. For Defendants Alex Korn, Allan Shiell, Sean Zaichick, Julian Shiell, Chris Quilliam, and Nicholas Bridges:

a. The then-current residence address, mailing addresses, and telephone numbers of Defendant;

b. The then-current employment and business addresses and telephone numbers of Defendant, a description of the business activities of each such employer or business, and the title and responsibilities of Defendant for each such employer or business; and

c. Any other changes required to be reported under Paragraph A of this Section.

2. For all Defendants:

a. A copy of each acknowledgment of receipt of this Order, obtained pursuant to Paragraph D of Section VIII; and

b. Any other changes required to be reported under Paragraph A of this Section.

C. For the purposes of this Order, Defendants shall, unless otherwise directed by the Commission's authorized representatives, mail all written notifications to the Commission to:

Associate Director for Enforcement
Federal Trade Commission
601 New Jersey Avenue N.W.
Washington, D.C. 20580
Re: FTC v. STF Group Inc., et al., Civil Action No. 03-C-0977.

D. For purposes of the compliance reporting and monitoring required by this Order, the Commission is authorized to communicate directly with Defendants.

VII. RECORD KEEPING PROVISIONS

IT IS FURTHER ORDERED that, for a period of six (6) years from the date of entry of this Order, for any business where (1) a Defendant is the majority owner of the business or directly or indirectly manages or controls the business, and where (2) the business is engaged in telemarketing, or assisting others engaged in telemarketing, Defendants, and their successors, assigns, officers, agents, servants, employees, and those persons in active concert or participation with them who receive actual notice of this Order by personal service, facsimile, or otherwise, whether acting directly or through any corporation, subsidiary, division, entity, person, name, or

other device, are hereby restrained and enjoined from failing to create and retain the following records:

- A. Accounting records that reflect the cost of goods or services sold, revenues generated, and the disbursement of such revenues;
- B. Personnel records accurately reflecting: the name, address, and telephone number of each person employed in any capacity by such business, including as an independent contractor; that person's job title or position; the date upon which the person commenced work; and the date and reason for the person's termination, if applicable;
- C. Customer files containing the names, addresses, telephone numbers, dollar amounts paid, quantity of items or services purchased, and description of items or services purchased, to the extent such information is obtained in the ordinary course of business;
- D. Complaints and refund requests (whether received directly, indirectly, or through any third party) and any responses to those complaints or requests;
- E. Copies of all sales scripts, training materials, advertisements, or other marketing materials; and
- F. All records and documents necessary to demonstrate full compliance with each provision of this Order, including, but not limited to, copies of acknowledgments of receipt of this Order, required by Paragraph D of Section VIII, and all reports submitted to the Commission pursuant to Section VI.

VIII. DISTRIBUTION OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that, for a period of three (3) years from the date of entry of this Order, Defendants shall deliver copies of this Order as directed below:

A. Defendants STF Group Inc., STF Group, STF Group (Burlington), STF Group (Newmarket), Start to Finish Consulting Group, Inc., Start to Finish Consulting Group, Start to Finish Marketing, Inc., 1363883 Ontario Limited, Q-Prompt, Inc., 487948 Ontario Limited, 1363942 Ontario Limited, Korn Land Corporation, Med Plan, Inc., Medical Discount Inc., Medplan Burlington, Medplan Mississauga, Medplan Newmarket, Medplan North York, Medplan Scollard, Chembe Management, Inc., Great Sailing Management Inc., Thunderchild Consulting Inc., SMAKK Consulting Inc., GTCQ, Inc., Global Discount Healthcare Benefits, 1108114 Ontario Inc., and 1349927 Ontario Inc. must deliver a copy of this Order to all of their principals, officers, directors and managers, and also must deliver copies of this Order to all of their employees, agents and representatives who engage in conduct related to the subject matter of the Order. For current personnel, delivery shall be within (5) days of service of this Order upon Defendant. For new personnel, delivery shall occur prior to them assuming their responsibilities.

B. For any business that Defendant Alex Korn, Allan Shiell, Sean Zaichick, Julian Shiell, Chris Quilliam, or Nicholas Bridges controls, directly or indirectly, or in which Defendant has a majority ownership interest, Defendant must deliver a copy of this Order to all principals, officers, directors, and managers of that business. Defendant must also deliver copies of this Order to all employees, agents, and representatives of that business who engage in conduct related to the subject matter of the Order. For current personnel, delivery shall be within five (5) days of service of this Order upon Defendant. For new personnel, delivery shall occur prior to them assuming their responsibilities.

C. For any business where Defendant Alex Korn, Allan Shiell, Sean Zaichick, Julian Shiell, Chris Quilliam, or Nicholas Bridges is not a controlling person of the business but otherwise engages in conduct related to the subject matter of this Order, Defendant must deliver a copy of this Order to all principals and managers of such business before engaging in such conduct.

D. All Defendants must secure a signed and dated statement acknowledging receipt of the Order, within thirty (30) days of delivery, from all persons receiving a copy of the Order pursuant to this Section.

IX. ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that each Defendant, within five (5) business days of receipt of this Order as entered by the Court, must submit to the Commission a truthful sworn statement acknowledging receipt of this Order.

X. SEVERABILITY

IT IS FURTHER ORDERED that the provisions of this Order are separate and severable from one another. If any provision is stayed or determined to be invalid, the remaining provisions shall remain in full force and effect.

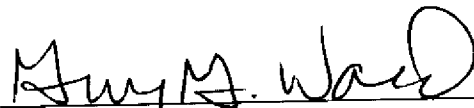
XI. RETENTION OF JURISDICTION

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

The Commission and Defendants hereby stipulate and agree to entry of the foregoing Order, which shall constitute a final judgment in this action.

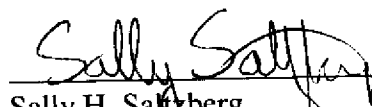
SO STIPULATED:

William Blumenthal
General Counsel



Dated: June 8, 2006

David A. O'Toole
Guy G. Ward
John C. Hallerud
Federal Trade Commission
55 East Monroe Street, Suite 1860
Chicago, Illinois 60603
(312) 960-5634; Facsimile: (312) 960-5600
Attorneys for Federal Trade Commission



Dated: April 26, 2006

Sally H. Saltzberg
Loftus & Saltzberg, P.C.
53 West Jackson Boulevard, Suite 1515
Chicago, Illinois 60604
(312) 913-2000; Facsimile: (312) 663-6406
Attorney for Defendants



Dated: April 24/06

Alex Korn, individually, and as an officer
and director of Defendant corporations

Allan Shiell, individually, and as an officer
and director of Defendant corporations

Dated: _____



Dated: April 24th/06

Sean Zaichick, individually, and as an officer
and director of Defendant corporations

The Commission and Defendants hereby stipulate and agree to entry of the foregoing Order, which shall constitute a final judgment in this action.

SO STIPULATED:

William Blumenthal
General Counsel

Dated: _____

David A. O'Toole
Guy G. Ward
John C. Hallerud
Federal Trade Commission
55 East Monroe Street, Suite 1860
Chicago, Illinois 60603
(312) 960-5634; Facsimile: (312) 960-5600
Attorneys for Federal Trade Commission

Dated: _____

Sally H. Saltzberg
Loftus & Saltzberg, P.C.
53 West Jackson Boulevard, Suite 1515
Chicago, Illinois 60604
(312) 913-2000; Facsimile: (312) 663-6406
Attorney for Defendants

Dated: _____

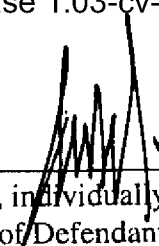
Alex Korn, individually, and as an officer
and director of Defendant corporations

Dated: 29/5/06

Allan Shieh, individually, and as an officer
and director of Defendant corporations

Dated: _____

Sean Zaichick, individually, and as an officer
and director of Defendant corporations



Julian Shiell, individually, and as an officer
and director of Defendant corporations

Dated: 24/4/2006

Chris Quilliam, individually, and as an officer
and director of Defendant corporations

Dated: _____

Nicholas Bridges, individually, and as an officer
and director of Defendant corporations

Dated: _____

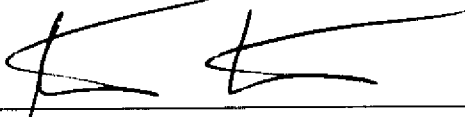
IT IS SO ORDERED.

Dated: _____, 2006

Honorable James B. Zagel
United States District Judge



Julian Shiell, individually, and as an officer
and director of Defendant corporations



Dated: _____

Chris Quilliam, individually, and as an officer
and director of Defendant corporations

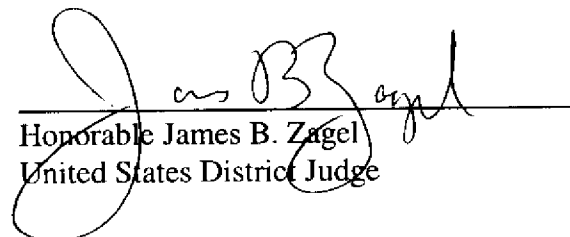
Dated: APRIL 24TH, 2006

Nicholas Bridges, individually, and as an officer
and director of Defendant corporations

Dated: _____

IT IS SO ORDERED.

Dated: JUL 21 2006, 2006



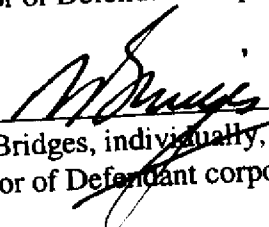
Honorable James B. Zagel
United States District Judge

Julian Shiell, individually, and as an officer
and director of Defendant corporations

Dated: _____

Chris Quilliam, individually, and as an officer
and director of Defendant corporations

Dated: _____



Nicholas Bridges, individually, and as an officer
and director of Defendant corporations

Dated: 25th April 2006

IT IS SO ORDERED.

Dated: _____, 2006

Honorable James B. Zagel
United States District Judge