

SCANNED

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

2005 JUL 24 AM 9:39

MJ cc: Counsel
DEPUTY CLERK

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CIVIL NO. 2:04cv00241-GZS

IWORX, a corporation, and

SELFWORX.COM, LLC, a corporation, and

JEFFREY V. KRAL, and

BERNARD WILLIMANN,

Defendants,

and

SHAWN P. LYDEN,

Relief Defendant.

A TRUE COPY
ATTEST: William S. Brownell, Clerk
By *[Signature]*
Deputy Clerk

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

Plaintiff Federal Trade Commission ("FTC" or "Commission") commenced this action on November 4, 2004, by filing its Complaint pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), against defendants **IWORX, SELFWORX.COM, LLC, and JEFFREY V. KRAL** to secure a permanent injunction and other equitable relief for

defendants' deceptive acts and practices and false advertisements in commerce in connection with the advertising, marketing and sale of gel•ä•thin™ and Ultra LipoLean in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

The initial defendants—IWORX, SELFWORX.COM, LLC, and JEFFREY V. KRAL—and plaintiff FTC entered into a Stipulated Temporary Restraining Order (“TRO”) which this Court entered on November 9, 2004. The parties also stipulated that the TRO was to remain in effect indefinitely to permit the parties to explore settlement negotiations.

BERNARD WILLIMANN, an owner and officer of defendant corporations Iworx and Selfworx.com LLC, participated in the settlement negotiations through counsel. He has stipulated to being named as a party defendant in this matter, waiving service of summons and the Complaint and his right to file an answer to the Complaint.

SHAWN P. LYDEN, an owner and officer of defendant corporations Iworx and Selfworx.com LLC, participated in the settlement negotiations through counsel. He has stipulated to being named as a relief defendant in this matter, waiving service of the summons and the Complaint and his right to file an answer to the Complaint.

An *AMENDED COMPLAINT* and the *STIPULATIONS* adding **BERNARD WILLIMANN** and **SHAWN P. LYDEN** as defendants are filed contemporaneously herewith.

The parties, including **BERNARD WILLIMANN** and **SHAWN P. LYDEN**, have been represented by the attorneys whose names appear hereafter, and the parties have agreed to settlement of this action under the following terms and conditions, without adjudication of any issue of fact or law, and without defendants admitting liability for any of the matters alleged in the complaint, except as to the “Findings” set forth below as I.A., I.B., I.C. and I.D.

THEREFORE, upon stipulation by plaintiff and all defendants, it is hereby **ORDERED**, **ADJUDGED** and **DECREED** as follows:

I. FINDINGS

A. This Court has jurisdiction over the subject matter of this case and jurisdiction over all parties.

B. Venue in the District of Maine is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b).

C. The activities of defendants, including relief defendant, are in or affecting commerce, as “commerce” is defined in the FTC Act, 15 U.S.C. § 44.

D. The Complaint states a claim upon which relief can be granted against the defendants, including relief defendant, under Sections 5(a), 12 and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a), 52 and 53(b).

E. Defendants, including relief defendant, waive all rights to seek judicial review or otherwise challenge or contest the validity of this Order. Defendants, including relief defendant, also waive any claims that they may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action to the date of this Order.

F. Each party shall bear its own costs and attorneys’ fees.

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

II. DEFINITIONS

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

A. **Defendants**, unless otherwise specified, shall mean: Iworx, Selfworx.com, LLC, Jeffrey V. Kral and Bernard Willimann, individually, and their successors and assigns.

B. **Relief defendant**: Shawn P. Lyden.

C. **Weight-loss product**: Any product or program that is advertised, marketed, promoted, offered for sale, distributed or sold with express or implied representations that the product or program will or may cause weight or fat loss or reduce or eliminate cellulite or the appearance of cellulite in humans— including, but not limited to, gel•ä•thin™ and Ultra LipoLean or any other substantially similar product.

D. **Covered product or service**: Any weight-loss product, weight-loss program, dietary supplement, food or drug.

E. **Competent and reliable scientific evidence**: Tests, analyses, research, studies or other evidence based on the expertise of professionals in the relevant area, that have been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the professions to yield accurate and reliable results.

F. **Document(s) or record(s)**:

1. The original or a true copy of any written, typed, printed, electronically stored, transcribed, taped, recorded, filmed, punched or graphic matter or other data compilations of any kind—including, but not limited to, letters, email or other correspondence, messages, memoranda, interoffice communications, notes, reports, summaries, manuals, magnetic tapes or discs, tabulations, books, records, checks, invoices, work papers, journals, ledgers, statements, returns, reports, schedules or files; and

2. Any information stored on any desktop personal computer (“PC”) and workstations, laptops, notebooks and other portable computers, whether assigned to individuals or

in pools of computers available for shared use; and home computers used for work-related purposes; backup disks and tapes, archive disks and tapes and other forms of offline storage, whether stored onsite with the computer used to generate them, stored offsite in another company facility or stored offsite by a third-party, such as in a disaster recovery center; and computers and related offline storage used by defendants' associates, who include persons who are not employees of the company or who do not work on company premises.

G. **Asset(s):** Any legal or equitable interest in, right to, or claim to, any real and personal property—including, but not limited to chattel, goods, instruments, equipment, fixtures, general intangibles, effects, leaseholds, mail or other deliveries, shares of stock, lists of consumer names, inventory, checks, notes, accounts, credits, receivables, funds, monies and all cash, wherever located, and shall include both existing assets and assets acquired after the date of entry of this Order.

H. **And** and **or** in this Order shall be construed conjunctively or disjunctively, as necessary, to make the applicable sentence or phrase inclusive rather than exclusive.

I. **Including** means “including without limitation.”

III. PROHIBITED REPRESENTATIONS

A. IT IS HEREBY ORDERED that Defendants, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, and their officers, agents, servants, representatives, employees, and all persons or entities in active concert or participation with them who receive actual notice of this Order, by personal service or otherwise, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of gel•ä•thin, Lipolean, or any other weight-loss product, are hereby permanently restrained and enjoined from making any representation, in any manner, expressly or by implication, including through the use of a trade name or endorsement, that:

1. Such product causes rapid or substantial weight loss without the need to reduce caloric intake or increase physical activity;
2. Such product, when rubbed into the skin, causes substantial weight loss, or eliminates fat or cellulite from the body.

B. IT IS FURTHER ORDERED that defendants, directly or through any corporation, partnership, subsidiary, division, trade name or other device, and their officers, agents, representatives, employees, and all persons or entities in active concert or participation with them who receive actual notice of this Order by personal service, facsimile or otherwise, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale or distribution of any covered product in or affecting commerce, are hereby permanently enjoined from making any representation, expressly or by implication, including through the use of trade names or endorsements:

1. that any such covered product

- a. causes weight loss;
- b. causes rapid and substantial weight loss;
- c. reduces or eliminates body fat;
- d. reduces or eliminates cellulite from the body;
- e. absorbs fat or blocks absorption of fat from food.

2. about the health benefits, performance, efficacy, safety or side effects of such covered product;

unless, at the time the representation within the ambit of this Paragraph B is made, the representation is true and defendants possess and rely upon competent and reliable scientific evidence that substantiates the representation.

IV. PROHIBITED MISREPRESENTATIONS

IT IS FURTHER ORDERED that defendants, directly or through any corporation, partnership, subsidiary, division, trade name or other device, and their officers, agents, representatives, employees, and all persons or entities in active concert or participation with them who receive actual notice of this Order by personal service, facsimile or otherwise, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale or distribution of any covered product in or affecting commerce, are hereby permanently enjoined from misrepresenting—including through the use of trade names or endorsements—the existence, contents or validity, results, conclusions or interpretations of any test, study or research.

V. FOOD AND DRUG ADMINISTRATION

IT IS FURTHER ORDERED that nothing in this Order shall prohibit defendants from making any representation for any drug that is permitted in the labeling for such drug under any tentative final or final standard promulgated by the Food and Drug Administration (“FDA”) or under any new drug application approved by the FDA. Nothing in this Order shall prohibit defendants from making any representation for any product that is specifically permitted in labeling for such product by regulations promulgated by the FDA pursuant to the Nutrition Labeling and Education Act of 1990.

VI. SUSPENDED JUDGMENT

A. IT IS FURTHER ORDERED that judgment is hereby entered in favor of plaintiff, and against defendants jointly and individually, for equitable monetary relief in the amount of **TWENTY MILLION DOLLARS (\$20,000,000)**; *provided, however*, that when defendants fulfill the requirements of Section VII 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 Sections VII and IX of this Order.

B. IT IS FURTHER ORDERED that judgment is hereby entered in favor of plaintiff, and against relief defendant **Shawn P. Lyden** individually for equitable monetary relief in the amount of **FOUR HUNDRED THOUSAND DOLLARS (\$400,000)**, *provided however*, that when relief defendant fulfills the requirements of Section VII of this Order this judgment shall be suspended until further order of the Court, *and provided further*, that the judgment shall be subject to the conditions set forth in Sections VII and IX of this Order.

VII. MONETARY RELIEF

IT IS FURTHER ORDERED that defendants Iworx, Selfworx.com, LLC, Jeffrey V. Kral and Bernard Willimann and relief defendant Shawn P. Lyden, jointly and individually, are liable for payment of equitable monetary relief—including, but not limited to, consumer redress and /or disgorgement, and for payment of any attendant expenses of the administration of any redress fund in the amount of One Hundred Thousand Dollars (\$100,000). Such payment shall be made by certified check or cashier’s check within five (5) days of the entry of this Order and shall be remitted to:

FEDERAL TRADE COMMISSION
EAST CENTRAL REGION
EATON CENTER
1111 SUPERIOR AVENUE, SUITE 200
CLEVELAND, OHIO 44114
ATTENTION: *FTC v. Selfworx, et al.*

The monetary relief ordered herein does not constitute full compensation for the monetary harm alleged in the *AMENDED COMPLAINT* in this action, and is not accepted as such. Defendants and relief defendant acknowledge and agree that all monies paid pursuant to this Order are irrevocably paid to plaintiff Federal Trade Commission for purposes of settlement of the Commission's claims in this action.

VIII. USE OF FUNDS

IT IS FURTHER ORDERED that all funds paid pursuant to this Order shall be deposited into a fund administered by the Commission or its agents to be used for equitable relief—including, but not limited to, consumer redress and any attendant expenses for the administration of any redress funds. In the event that direct 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 defendants' practices alleged in the *AMENDED 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.

IX. RIGHT TO REOPEN

IT IS FURTHER ORDERED that the Commission's agreement to, and the Court's approval of, this Order are expressly premised upon the truthfulness, accuracy and completeness of defendants' financial conditions as represented in:

A. the Financial Statements—including the attachments thereto, of defendants Iworx and Selfworx.com, LLC, dated December 9, 2004, and of Jeffrey V. Kral, dated December 12, 2004, and identified as PX 100 in the December 16, 2004, deposition testimony of Jeffrey V. Kral;

B. the Financial Statement of Bernard Willimann, dated December 14, 2004, and identified as PX 105 in the December 16, 2004, deposition testimony of Bernard Willimann;

C. the sworn depositions of Jeffrey V. Kral and Bernard Willimann on December 16, 2004 and the sworn deposition of Shawn P. Lyden on February 22, 2005; and

D. any other documents submitted by defendants upon which the Commission relied in negotiating and agreeing to the terms of this Order.

If, upon motion by the Commission to the Court, 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, deposition testimony and/or other documents or information, the suspension of the monetary judgment will be

terminated as to that defendant, and the entire judgment amount of **TWENTY MILLION DOLLARS (\$20,000,000)**, representing the approximate amount of consumer injury, will become immediately due and payable, less any payments already made.

Provided, however, that any corporate misrepresentation will be construed as a misrepresentation by both of the individual defendants.

For purposes of this Paragraph, and any subsequent proceedings to enforce payment—including, but not limited to, a non-dischargeability complaint filed in bankruptcy proceedings, defendants waive any right to contest any of the allegations set forth in the *AMENDED COMPLAINT* filed in this matter or the **TWENTY-MILLION-DOLLAR (\$20,000,000)** judgment referenced above.

PROVIDED FURTHER, that if upon motion by the Commission to the Court, the Court finds that the relief 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, deposition testimony, and/or other documentary information, the suspension of the monetary judgment against the relief defendant will be terminated and the entire judgment of Four Hundred Thousand Dollars (\$400,000) will become due and payable, less any payments already made.

X. ACKNOWLEDGMENT OF RECEIPT OF ORDER

IT IS FURTHER ORDERED that, within five (5) business days of receipt of this Order as entered by the Court, defendants, including relief defendant, shall each execute and submit to the Commission a truthful sworn statement, in the form shown on Appendix A, acknowledging receipt of this Order.

XI. DISTRIBUTION OF THE ORDER

IT IS FURTHER ORDERED that, for a period of three (3) years from the date of entry of this Order, defendants **JEFFREY V. KRAL** and **BERNARD WILLIMANN**, and their successors and assigns, must deliver a copy of this Order to all principals, officers, directors, managers, employees, agents and representatives, including distributors, having responsibilities with respect to the subject matter of this Order, and must secure from each such person a signed and dated statement acknowledging receipt of the Order. Defendants Kral and Willimann, and their successors and assigns, must deliver this Order to current personnel within thirty (30) days after the date of service of this Order, and to new personnel within thirty (30) days after the person assumes such position or responsibilities.

XII. COMPLIANCE MONITORING

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

A. Within ten (10) days of receipt of written notice from a representative of the Commission, defendants each must 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 such defendants' possession or direct or indirect control to inspect the business operation;

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

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 defendants, defendants' employees or any other entity managed or controlled in whole or in part by defendants, without the necessity of identification or prior notice;

Provided that nothing in this Order limits 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).

C. Defendants must 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.

XIII. COMPLIANCE REPORTING

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 **JEFFREY V. KRAL** and **BERNARD WILLIMANN** must notify the Commission of any change in:

a. their residences, mailing addresses, and telephone numbers, within ten (10) days of the date of such change;

b. their employment status (including self-employment) within ten (10) days of the date of such change; such notice must include the name and address of each business that the defendants are affiliated with, employed by, or perform services for; a statement of the nature of the

business; and a statement of the defendants' duties and responsibilities in connection with the business;

c. their names or use of any aliases or fictitious names; and

2. Defendants **JEFFREY V. KRAL** and **BERNARD WILLIMANN**, and their successors and assigns, must notify the Commission of any changes in the corporate structure of Iworx and/or Selfworx.com, LLC, 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 corporation; 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 defendants Kral and Willimann learn less than thirty (30) days prior to the date such action is to take place, defendants Kral and Willimann must 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 must 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 must include, but not be limited to:

1. any changes required to be reported pursuant to subparagraph A, above; and

2. a copy of each acknowledgment of receipt of this Order obtained by defendants pursuant to Paragraph XI.

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

REGIONAL DIRECTOR
FEDERAL TRADE COMMISSION
EAST CENTRAL REGION
EATON CENTER
1111 SUPERIOR AVENUE, SUITE 200
CLEVELAND, OHIO 44114
ATTENTION: *FTC v. Selfworx, et al.*

D. For purposes of the compliance reporting required by this Paragraph, the Commission is authorized to communicate directly with defendants.

XIV. RECORD-KEEPING PROVISIONS

IT IS FURTHER ORDERED that, for a period of eight (8) years from the date of entry of this Order, defendants **JEFFREY V. KRAL** and **BERNARD WILLIMANN**, and their successors and assigns, and any business where the business engages in or assists others engaged in the manufacturing, advertising, promotion, offering for sale, distribution or sale of any weight-loss product, must maintain, and upon request, make available to the Commission, copies of all business records demonstrating compliance with the terms and provisions of this Order—including, but not limited to:

A. accounting records that reflect the cost of products, services or programs 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 products, services or programs purchased, and description of products, services or programs 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 advertisements, promotional materials, sales scripts, training materials or other materials utilized in the advertising, labeling, promotion, offering for sale, distribution or sale of any weight-loss product;

F. all materials that were relied upon in making any representation contained in the materials identified in subparagraph E, above;

G. all other documents evidencing or referring to the accuracy of any advertising claim or to the safety or efficacy of any weight-loss product—including, but not limited to, all tests, reports, studies, demonstrations or other evidence that confirm, contradict, qualify or call into question the safety or efficacy of any such product; and

H. records accurately reflecting the name, address, and telephone number of each manufacturer or laboratory engaged in the development or creation of any testing obtained for the purpose of advertising, labeling, promoting, offering for sale, distributing or selling any weight-loss product.

XV. RETENTION OF JURISDICTION

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

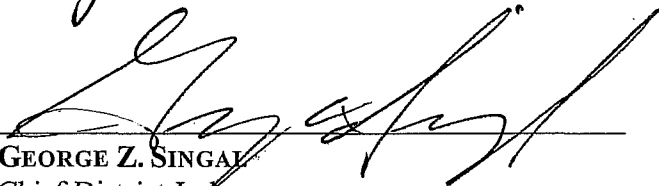
XVI. SCOPE OF ORDER

IT IS FURTHER ORDERED that this Order resolves only claims against the named defendants and does not preclude the Commission from initiating further action or seeking any remedy against any other persons or entities, including without limitation persons or entities who may be subject to portions of this Order by virtue of actions taken in concert or participation with defendants, and persons or entities in any type of indemnification or contractual relationship with defendants.

SO ORDERED:

JUDGMENT IS THEREFORE ENTERED in favor of plaintiff and against defendants, pursuant to all the terms and conditions recited above.

Dated this 24th day of May, 2005.



GEORGE Z. SINGAL
Chief District Judge

**For Plaintiff
Federal Trade Commission**

JOHN D. GRAUBERT
Acting General Counsel
Federal Trade Commission
Washington, D.C. 20580

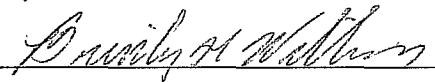
JOHN M. MENDENHALL
Director, East Central Region
Federal Trade Commission
Cleveland, Ohio 44114-2507

BRINLEY H. WILLIAMS Ohio Bar #0011793
Phone 216-263-3414
Fax 216-263-3426
Email: BWilliams@FTC.gov

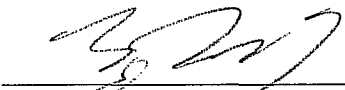
MICHAEL MILGROM Ohio Bar #0012959
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Email: MMilgrom@FTC.gov

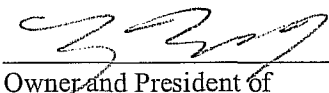
JONATHAN L. KESSLER Colorado Bar #15094
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COUNSEL FOR PLAINTIFF
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East Central Region
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Cleveland, Ohio 44114-2507

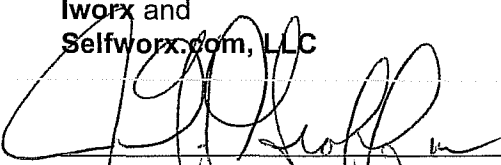
By: 
Date: May 19, 2005

For Defendants
Iworx, a corporation;
Selfworx.com, LLC, a corporation;
Jeffrey V. Kral; and **Bernard Willimann**.

By: 
Owner and President of **IWORX**
Date: 3-30-05

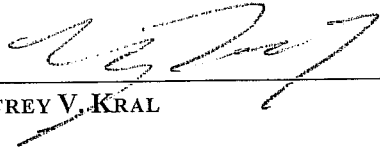
By: 
Owner and President of
SELFWORX.COM, LLC
Date: 3-30-05

Counsel for Defendants
Iworx and
Selfworx.com, LLC


JOSEPH H. GROFF III, Esq.
Jensen, Baird, Gardner & Henry
Ten-Free Street
P.O. Box 4510
Portland, Maine 04112-4510
Phone 207-775-7271 / Fax 207-775-7935

Date: 3/30/05

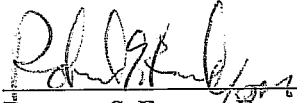
Jeffrey V. Kral,
individually, and as an owner and officer of
Iworx and Selfworx.com, LLC



JEFFREY V. KRAL

Date: 3-30-05

Counsel for Defendant Jeffrey V. Kral

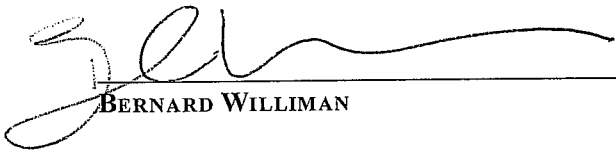


ROBERT S. FRANK, ESQ.

Harvey & Frank
Two City Center — P.O. Box 126
Portland, Maine 04112-0126
Phone 207-775-1300 / Fax 207-775-5639

Date: 3/30/05

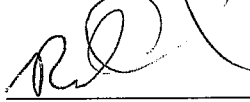
Bernard Williman,
individually, and as an owner and officer of
Iworx and Selfworx.com, LLC



BERNARD WILLIMAN

Date: 3-30-05

Counsel for Defendant Bernard Willimann

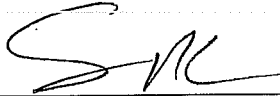


RICHARD OLSON, ESQ.

Perkins and Olson, P.A.
30 Milk Street — P.O. Box 449
Portland, Maine 04112-0449
Phone 207-871-7159 / Fax 207-871-0521

Date: 3/30/05

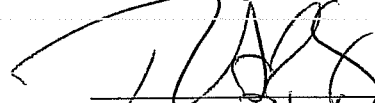
Relief Defendant
Shawn P. Lyden



SHAWN P. LYDEN,
individually, and as an owner and officer of
Iworx and Selfworx.com, LLC

Date: 3/25/05

Counsel for Relief Defendant
Shawn P. Lyden



[Name] Peter G. Gory
[Address] Mittal/Asch, LLC
83 Exchange Street
[Phone / Fax] Portland, ME 04101
(207) 775-3101 - P (207) 871-0683-f

Date: 3/25/05

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CIVIL NO. 2:04cv00241-GZS

IWORX, a corporation, and

SELFWORX.COM, LLC, a corporation, and

JEFFREY V. KRAL, and

BERNARD WILLIMANN,

Defendants,

and

SHAWN LYDEN,

Relief Defendant.

AFFIDAVIT OF [DEFENDANT'S NAME]

I, *[Defendant's Name]*, being duly sworn, hereby state and affirm as follows:

1. My name is *[Defendant's Full Name]*. My current residence address is *[Street Address, City, State, ZIP Code]*. I am a citizen of the United States, and I am over the age of eighteen (18 years). I have personal knowledge of the facts set forth in this Affidavit.

