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10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 **FEDERAL TRADE COMMISSION,**

14 Plaintiff

15 v.

16 **INTEGRATED CAPITAL INC., et al.,**

17 Defendants.

Case No. CV-N-03-0412-DWH (RAM)

18 **PLAINTIFF'S MOTION FOR AN ORDER HOLDING DEFENDANT INTEGRATED**
19 **CAPITAL INC. AND ALAN WILSON IN CIVIL CONTEMPT AND FOR ORDER**
20 **MODIFYING STIPULATED FINAL ORDER**

21 Plaintiff Federal Trade Commission ("FTC") hereby moves the Court for (1) an order
22 holding defendant Integrated Capital Inc., doing business as National Student Financial Aid
23 ("NSFA"), and its principal, Alan Wilson, in civil contempt of court for violating the Stipulated
24 Final Consent Order ("Final Order") entered in this case and (2) an order modifying the Final
25 Order. Among other things, the Final Order requires NSFA and its officers to make certain
26 affirmative disclosures and enjoins the making of certain prohibited misrepresentations during
27 sales presentations to consumers for NSFA's college financial aid services. Since entry of the
28 Final Order, however, NSFA and, since October 2003 when he took over NSFA, Alan Wilson

1 have failed to make the required disclosures and continued to make the prohibited
2 misrepresentations during NSFA's sales presentations. NSFA's sales during this period are at
3 least \$1,938,277. As a remedy for this contemptuous behavior, the FTC requests that NSFA and
4 Alan Wilson be held in civil contempt and that they be ordered to compensate the victims of their
5 contumacious conduct. Further, their demonstrated inability to comply with the Final Order
6 constitutes an appropriate change of circumstances warranting a modification of the Final Order
7 to ban NSFA and Alan Wilson from marketing or selling academic goods and services.

8 The FTC supports its motion with several declarations from consumers and from FTC
9 investigators who attended (undercover) NSFA sales seminars. The FTC is prepared to call these
10 individuals as witnesses to testify as to what is contained in their declarations, if the Court
11 requests.

12 Dated: July 21, 2004

Respectfully submitted,

13 WILLIAM E. KOVACIC
14 General Counsel

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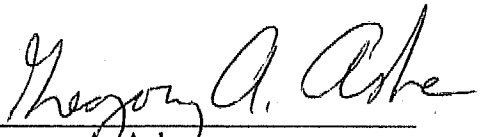
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 21, 2004, true and correct copies of **(1) PLAINTIFF'S MOTION FOR AN ORDER HOLDING DEFENDANT INTEGRATED CAPITAL INC. AND ALAN WILSON IN CIVIL CONTEMPT AND FOR ORDER MODIFYING STIPULATED FINAL ORDER, (2) MEMORANDUM IN SUPPORT THEREOF, (3) EXHIBITS IN SUPPORT THEREOF, and (4) PROPOSED ORDER** were served by overnight courier on the following:

Kenneth Simon, Esq.
Flicker, Garelick & Associates
318 East 53rd Street
New York, NY 10022
Attorney for Integrated Capital and Alan Wilson

Executed on this 21st day of July, 2004.



Gregory A. Ashe
Attorney for Plaintiff