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CENTRAL DISTRICT OF CALIFORNIA
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14 CENTRAL DISTRICT OF CALIFORNIA
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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

15 FEDERAL TRADE COMMISSION,
16 Plaintiff,
17 v.
18 INTERNATIONAL TRADER, et al.
19 Defendants.

No. CV-02-02701 AHM (JTLx)
STIPULATED FINAL JUDGMENT
AND ORDER FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF

20
21 Plaintiff, the Federal Trade Commission ("Commission"),
22 commenced this action on April 2, 2002 by filing its Complaint for
23 Injunctive and Other Equitable Relief ("Complaint") pursuant to
24 Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15
25 U.S.C. § 53(b), charging that Defendants International Trader and
26 Bruce Anugwom were engaged in deceptive acts or practices in
27 violation of Section 5 of the FTC Act, 15 U.S.C. § 45, in
28 connection with the advertising, telemarketing, offering for sale,

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1 and sale of work-at-home medical billing employment opportunities.

2 The Commission and Defendants, as hereinafter defined, hereby
3 stipulate to entry of this Stipulated Final Judgment and Order for
4 Permanent Injunction and Other Equitable Relief ("Order").

5 NOW THEREFORE, the Commission and Defendants having requested
6 the Court to enter this Order,

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

8 FINDINGS

9 1. This is an action by the Commission instituted under
10 Sections 5 and 13(b) of the FTC Act, 15 U.S.C. §§ 45 and 53(b).
11 The Complaint seeks permanent injunctive relief against Defendants
12 in connection with the advertising, offering for sale, and sale of
13 work-at-home medical billing employment opportunities, and
14 equitable monetary relief in the form of consumer redress and/or
15 disgorgement.

16 2. This Court has jurisdiction over the subject matter of
17 this action and the parties.

18 3. Venue is proper as to all parties in the Central District
19 of California.

20 4. The Commission's Complaint states claims upon which
21 relief may be granted against Defendants under Sections 5(a) and
22 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).

23 5. The Commission has the authority under Section 13(b) of
24 the FTC Act to seek the relief it has requested.

25 6. The activities of Defendants, as alleged in the
26 Complaint, are in or affecting commerce, as defined in Section 4 of
27 the FTC Act, 15 U.S.C. § 44.

28 7. Defendants have entered into this Order freely and

1 without coercion. Defendants further acknowledge that they have
2 read the provisions of this Order and are prepared to abide by
3 them.

4 8. The Commission and Defendants stipulate and agree to this
5 Order, without trial or final adjudication of any issue of fact or
6 law, to settle and resolve all matters in dispute between them
7 arising from the Complaint up to the date of entry of this Order.

8 9. Defendants waive all rights to seek judicial review or
9 otherwise challenge or contest the validity of this Order.
10 Defendants further waive and release any claim that any of them may
11 have against the Federal Trade Commission, its employees, agents or
12 representatives, or against the Receiver, Byron Z. Moldo, or his
13 employees, agents or representatives, or against the assets of the
14 receivership estate.

15 10. Defendants have agreed that this Order does not entitle
16 Defendants to seek or to obtain attorneys' fees as a prevailing
17 party under the Equal Access to Justice Act, 28 U.S.C. § 2412, as
18 amended, and Defendants further waive any claim that any of them
19 may have under said provision of law. Each settling party shall
20 bear its own costs and attorneys' fees.

21 11. This Order is in addition to, and not in lieu of, any
22 other civil or criminal remedies that may be provided by law.

23 12. Entry of this Order is in the public interest.

24 13. Pursuant to Federal Rule of Civil Procedure 65(d) the
25 provisions of this Order are binding upon Defendants, their
26 officers, agents, servants, employees, corporations, successors and
27 assigns, and upon those persons or entities in active concert or
28 participation with them who receive actual notice of this Order by

1 personal service or otherwise.

2 **DEFINITIONS**

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

5 1. "Assets" means any legal or equitable interest in, right
6 to, or claim to, any real or personal property, including but not
7 limited to chattels, goods, instruments, money, funds, equipment,
8 fixtures, general intangibles, effects, leaseholds, mail or other
9 deliveries, inventory, checks, notes, accounts, credits,
10 receivables (as those terms are defined in the Uniform Commercial
11 Code), and all cash, wherever located.

12 2. "Assisting others" means providing any of the following
13 goods or services to any person or entity: (a) formulating or
14 providing, or arranging for the formulation or provision of, any
15 good or service related to Medical Billing or any Work-At-Home
16 Opportunity; (b) formulating or providing, or arranging for the
17 formulation or provision of, any telephone sales script or any
18 other marketing material; (b) hiring, recruiting, or training
19 personnel; (c) advising or consulting others on the commencement or
20 management of a business venture; (d) providing names of, or
21 assisting in the generation of, potential customers; (e) performing
22 customer service functions, including but not limited to, receiving
23 or responding to consumer complaints; (f) performing marketing or
24 telemarketing services of any kind; or (g) acting as an officer or
25 director of a business entity.

26 3. "Customer" means any person who is or may be required to
27 pay for goods or services offered through telemarketing.

28 4. "Defendants" means International Trader, a Nevada

1 corporation, doing business as Fidelity Resources, Premier Business
2 Solutions and American Data Systems, and Bruce Anugwom,
3 individually, and doing business as Fidelity Resources, Premier
4 Business Solutions, American Data Systems, and International
5 Trader, and as an officer and director of International Trader, a
6 Nevada corporation, and all of them, by whatever names each might
7 be known, whether acting directly or through any person,
8 corporation, affiliate, division, agent, employee, consultant,
9 independent contractor or other device.

10 5. "Document" is synonymous in meaning and equal in scope to
11 the usage of the term in Federal Rule of Civil Procedure 34(a), and
12 includes writings, drawings, graphs, charts, photographs, audio and
13 video recordings, electronic mail ("email"), computer records, and
14 other data compilations from which information can be obtained and
15 translated, if necessary, through detection devices into reasonably
16 usable form. A draft or non-identical copy is a separate document
17 within the meaning of the term.

18 6. "Material" means likely to affect a person's choice of,
19 or conduct regarding, goods or services.

20 7. "Medical Billing" means any service by which bills or
21 charges for medical services or products or medically related
22 services or products are sent, directly or indirectly, to a patient
23 or third party payor, including but not limited to, insurance
24 companies, on behalf of the physician, doctor or other provider of
25 a medical service or product or medically related service or
26 product.

27 8. "Person" means any individual, group, unincorporated
28 association, limited or general partnership, corporation, or other

1 business entity.

2 9. "Telemarketing" means the advertising, offering for sale,
3 or sale of any item, product, good or service to any person by
4 means of telephone sales presentations, either exclusively or in
5 conjunction with the use of other forms or marketing;

6 10. "Work-At-Home Opportunity" means any program, plan,
7 product, or service represented to enable or assist a participant
8 or purchaser to earn money while working at home.

9 **I. BAN ON CERTAIN ACTIVITIES**

10 **IT IS ORDERED** that Defendants, whether directly or indirectly,
11 or through any corporation, business entity, or person under their
12 control, are hereby permanently restrained and enjoined from
13 engaging, participating, or assisting others in the advertising,
14 promoting, telemarketing, offering for sale, or sale of any Work-
15 At-Home Opportunity. Nothing in this Order shall be read as an
16 exception to this Paragraph.

17 **II. PROHIBITED BUSINESS ACTIVITIES**

18 **IT IS FURTHER ORDERED** that, in connection with the
19 advertising, promotion, offering for sale, sale or distribution of
20 any item, product, good, service, business opportunity, employment
21 opportunity, or Work-At-Home Opportunity, Defendants and their
22 officers, agents, servants, employees, successors and assigns, and
23 any other person or entity through which any of them does business,
24 and any other person or entity in active concert or participation
25 with them who receives actual notice of this Order by personal
26 service or otherwise, are hereby permanently restrained and
27 enjoined from:

28 A. Misrepresenting, expressly or by implication, that they

1 have job openings or work-at-home positions to fill;

2 B. Misrepresenting, expressly or by implication, that work-
3 at-home positions are available in particular geographic areas;

4 C. Misrepresenting, expressly or by implication, that they
5 will furnish consumers with clients or the names and addresses of
6 doctors who are likely to use consumers to process medical claims
7 from home;

8 D. Misrepresenting, expressly or by implication, that they
9 have established relationships with doctors or any other potential
10 employers;

11 E. Misrepresenting, expressly or by implication, that
12 consumers are likely to earn a specific level of earnings
13 processing medical claims;

14 F. Misrepresenting, expressly or by implication, the wage or
15 salary for any job or work-at-home position;

16 G. Misrepresenting, expressly or by implication, that
17 consumers can readily obtain refunds upon request;

18 H. Misrepresenting, expressly or by implication, the terms
19 and conditions of any refund or guarantee policy;

20 I. Failing to disclose in a clear and conspicuous manner,
21 prior to charging a consumer for any good or service, all material
22 terms, conditions, and limitations of any refund or guarantee
23 policy, or any policy of non-refundability;

24 J. Misrepresenting, expressly or by implication, any
25 material fact regarding any item, product, good, or service sold or
26 offered for sale;

27 K. Violating the Telemarketing Sales Rule ("TSR"), 16 C.F.R.
28 Part 310, including any amendments thereto; and

1 L. Assisting others who violate any provision of Paragraphs
2 A-K of this Section II.

3 **III. PROHIBITIONS REGARDING CONSUMERS**

4 **IT IS FURTHER ORDERED** that Defendants and their officers,
5 agents, servants, employees, corporations, successors and assigns,
6 and any other person or entity through which any of them does
7 business, and any other person or entity in active concert or
8 participation with them who receives actual notice of this Order by
9 personal service or otherwise, are hereby permanently restrained
10 and enjoined from:

11 A. Selling, renting, leasing, transferring, or otherwise
12 disclosing the name, address, telephone number, Social Security
13 number, credit card number, bank account number, e-mail address, or
14 other identifying information of any person who paid any money to
15 any Defendant, at any time prior to entry of this Order, for any
16 Work-At-Home Opportunity or any good or service related to Medical
17 Billing; *provided, however,* that Defendants may disclose such
18 identifying information to a law enforcement agency or as required
19 by any law, regulation, or court order;

20 B. Seeking to collect, collecting, or assigning any right to
21 collect payment, directly or through any third party, for any Work-
22 At-Home Opportunity or any good or service related to Medical
23 Billing, from any customer of International Trader, Fidelity
24 Resources, Premier Business Solutions, or American Data Systems.

25 **IV. MONETARY RELIEF**

26 **IT IS FURTHER ORDERED** that:

27 A. Judgment is hereby entered against Defendants, jointly
28 and severally, in the amount of one million dollars

1 (\$1,000,000.00); provided, however, that this judgment shall be
2 suspended (1) subject to the liquidation and disposition of the
3 assets of International Trader, Fidelity Resources, Premier
4 Business Solutions, and American Data Systems as set forth in
5 Paragraph A of Section V of this Order; and (2) as long as the
6 Court makes no finding, as provided in Section VII of this Order,
7 that Defendants have materially misrepresented or omitted the
8 nature, existence or value of any asset;

9 B. Any and all funds paid pursuant to Paragraph A of this
10 Section IV and/or Paragraph A of Section V of this Order shall be
11 deposited into a fund administered by the Commission or its agent
12 to be used for equitable relief, including but not limited to
13 consumer redress and any attendant expenses for the administration
14 of any redress fund. In the event that direct redress to consumers
15 is wholly or partially impracticable or funds remain after redress
16 is completed, the Commission may apply any remaining funds for such
17 other equitable relief (including consumer information remedies) as
18 it determines to be reasonably related to the Defendants' practices
19 alleged in the Complaint. Any funds not used for such equitable
20 relief shall be deposited to the Treasury as disgorgement.
21 Defendants shall have no right to challenge the Commission's choice
22 of remedies under this Paragraph.

23 C. Defendants are hereby required, in accordance with 31
24 U.S.C. § 7701, to furnish to the Commission their Social Security
25 numbers and/or taxpayer identification numbers, which shall be used
26 for purposes of collecting and reporting on any delinquent amount
27 arising out of this Order;

28 D. Defendants further agree that the facts as alleged in the

1 Complaint shall be taken as true in the event of any subsequent
2 litigation to enforce this Order or to collect amounts due pursuant
3 to this Order, including but not limited to a nondischargeability
4 complaint in any bankruptcy proceeding.

5 E. The judgment entered pursuant to Paragraph A of this
6 Section IV, and all funds paid pursuant to Paragraph A of Section V
7 of this Order, is equitable monetary relief, solely remedial in
8 nature, and not a fine, penalty, punitive assessment or forfeiture.

9 **V. RECEIVERSHIP**

10 **IT IS FURTHER ORDERED** that the appointment of Byron Z. Moldo
11 as Receiver pursuant to the Stipulated Preliminary Injunction
12 entered by this Court on April 23, 2002 is hereby continued as
13 modified by this Section V.

14 A. The Receiver shall complete the liquidation of all assets
15 of International Trader, Fidelity Resources, Premier Business
16 Solutions, and American Data Systems, including all furniture,
17 equipment and other contents of Defendants' premises at 10680 West
18 Pico Boulevard, Suite 280, Los Angeles, California 90064. The
19 proceeds of said liquidation shall be included in the receivership
20 estate along with all other assets of the Receivership Defendants,
21 including but not limited to all funds in, or transferred to the
22 Receiver from, Wells Fargo Bank account numbers 069-3311995,
23 2190785036 and 602382010, and Bank of America account numbers
24 03483-08078 and 03486-11333. Upon liquidation of the assets of
25 International Trader, Fidelity Resources, Premier Business
26 Solutions, and American Data Systems, the Receiver shall submit a
27 final report and application for fees and expenses, and upon
28 approval of the same shall pay:

1 1. To the Receiver the amounts allowed by the Court
2 pursuant to the Receiver's application for fees and expenses;

3 2. If any funds remain after the Receiver is paid, a
4 sum up to but not exceeding \$1,500 to Gene W. Choe, counsel for
5 Defendants, for attorneys' fees; and

6 3. Any remaining funds to the Commission for the fund
7 established pursuant to Paragraph B of Section IV of this Order.

8 B. Upon the filing of the Receiver's final report, the
9 Court's approval of the same, and the Receiver's fulfillment of his
10 payment obligations under this Section V, the Receivership over
11 International Trader, Fidelity Resources, Premier Business
12 Solutions, and American Data Systems pursuant to the Stipulated
13 Preliminary Injunction entered by this Court on April 23, 2002
14 shall be terminated.

15 **VI. ASSET FREEZE**

16 **IT IS FURTHER ORDERED** that:

17 A. The freeze against the assets of Bruce Anugwom pursuant
18 to the Stipulated Preliminary Injunction entered by this Court on
19 April 23, 2002 shall be lifted upon entry of this Order.

20 B. The freeze against the assets of International Trader,
21 Fidelity Resources, Premier Business Solutions, and American Data
22 Systems pursuant to the Stipulated Preliminary Injunction entered
23 by this Court on April 23, 2002 shall remain in effect until such
24 time as the Receiver, pursuant to Paragraphs A and B of Section V
25 of this Order, receives payment of all Court-approved fees and
26 expenses, transfers any remaining funds to the Commission, and is
27 discharged by the Court.

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VII. RIGHT TO REOPEN

IT IS FURTHER ORDERED that, within five (5) business days after entry of this Order, Defendants shall submit to the Commission two truthful sworn statements, in the forms shown on Appendices A and B, that shall acknowledge receipt of this Order and shall reaffirm and attest to the truthfulness, accuracy and completeness of the financial statements submitted to the Commission by Defendants, namely: (A) that of Defendant International Trader, dated April 7, 2002; and (B) that of Defendant Bruce Anugwom, dated April 7, 2002.

The Commission's agreement to this Order is expressly premised on the truthfulness, accuracy and completeness of such financial statements. If, upon motion by the Commission, the Court finds that any such financial statement contains any material misrepresentation or omission, the suspended judgment entered in Paragraph A of Section IV of this Order shall become immediately due and payable by Defendants, and interest computed at the rate prescribed under 28 U.S.C. § 1961, as amended, shall immediately begin to accrue on the unpaid balance; provided, however, that in all other respects this Order shall remain in full force and effect unless otherwise ordered by the Court; and, provided further, that proceedings instituted under this provision would be in addition to, and not in lieu of, any other civil or criminal remedies as may be provided by law, including but not limited to contempt proceedings, or any other proceedings that the Commission or the United States may initiate to enforce this Order. For purposes of this Paragraph, Defendants waive any right to contest any of the allegations in the Complaint.

1 VIII. RECORD KEEPING PROVISIONS

2 IT IS FURTHER ORDERED that, for a period of eight (8) years
3 from the date of entry of this Order, in connection with any
4 business where any Defendant is the majority owner of the business
5 or directly or indirectly manages or controls the business,
6 Defendants and their officers, agents, servants, employees,
7 corporations, successors and assigns, and those persons in active
8 concert or participation with them who receive actual notice of
9 this Order by personal service or otherwise, are hereby restrained
10 and enjoined from failing to create and retain the following
11 records:

12 A. Books, records or accounts that, in reasonable detail,
13 accurately and fairly reflect the cost of goods or services sold,
14 revenues generated, and the disbursement of such revenues;

15 B. Records accurately reflecting: the name, address, and
16 telephone number of each person employed in any capacity by such
17 business, including as an independent contractor; that person's job
18 title or position; the date upon which the person commenced work;
19 and the date and reason for the person's termination, if
20 applicable;

21 C. Records containing the names, addresses, phone numbers,
22 dollar amounts paid, quantity of items or services purchased, and
23 description of items or services purchased, for all consumers to
24 whom such business has sold, invoiced or shipped any goods or
25 services, to the extent such information is obtained in the
26 ordinary course of business;

27 D. Records that include and reflect, for every consumer
28 complaint or refund request received directly or indirectly or

1 through any third party: (a) the consumer's name, address,
2 telephone number and the dollar amount paid by the consumer; (b)
3 the written complaint or refund request, if any, and the date of
4 the complaint or refund request; (c) the basis of the complaint,
5 including the name of any salesperson complained against, and the
6 nature and result of any investigation conducted concerning any
7 complaint; (d) each response and the date of the response; (e) any
8 final resolution and the date of the resolution; and (f) in the
9 event of a denial of a refund request, the reason for the denial;
10 and

11 E. Copies of all sales scripts, training materials,
12 advertisements, or other marketing materials utilized.

13 **IX. AUTHORITY TO MONITOR COMPLIANCE**

14 **IT IS FURTHER ORDERED** that the Commission is authorized to
15 monitor Defendants' compliance with this Order by all lawful means,
16 including but not limited to the following means:

17 A. The Commission is authorized, without further leave of
18 Court, to obtain discovery from any person in the manner provided
19 by Chapter V of the Federal Rules of Civil Procedure, Fed. R. Civ.
20 P. 26 through 37, including the use of compulsory process pursuant
21 to Fed. R. Civ. P. 45, for the purpose of monitoring and
22 investigating Defendants' compliance with any provision of this
23 Order;

24 B. The Commission is authorized to use representatives
25 posing as consumers and suppliers to Defendants, their employees,
26 or any other entity managed or controlled in whole or in part by
27 any Defendant, without the necessity of identification or prior
28 notice;

1 C. Nothing in this Order shall limit the Commission's lawful
2 use of compulsory process, pursuant to Sections 9 and 20 of the FTC
3 Act, 15 U.S.C. §§ 49, 57b-1, to investigate whether any Defendant
4 has violated any provision of this Order or Section 5 of the FTC
5 Act, 15 U.S.C. § 45.

6 **X. ACCESS TO BUSINESS PREMISES**

7 **IT IS FURTHER ORDERED** that, for a period of five (5) years
8 from the date of entry of this Order, for the purpose of further
9 determining compliance with this Order, Defendants shall permit
10 representatives of the Commission, within three (3) business days
11 of receipt of written notice from the Commission:

12 A. Access during normal business hours to any office, or
13 facility storing documents, of any business where (1) any Defendant
14 is the majority owner of the business or directly or indirectly
15 manages or controls the business, and where (2) the business is
16 engaged in telemarketing, or in advertising, offering for sale, or
17 sale of any Work-At-Home Opportunity or any good or service related
18 to Medical Billing, or in assisting others engaged in said
19 activities. In providing such access, the Defendant shall permit
20 representatives of the Commission to inspect and copy all documents
21 relevant to any matter contained in this Order; and shall permit
22 Commission representatives to remove documents relevant to any
23 matter contained in this Order for a period not to exceed five (5)
24 business days so that the documents may be inspected, inventoried,
25 and copied. *Provided* that, upon application of the Commission and
26 for good cause shown, the Court may enter an *ex parte* order
27 granting immediate access to any Defendant's business premises for
28 the purposes of inspecting and copying all documents relevant to

1 any matter contained in this Order.

2 B. To interview the officers, directors, and employees,
3 including all personnel involved in responding to consumer
4 complaints or inquiries, and all sales personnel, whether
5 designated as employees, consultants, independent contractors or
6 otherwise, of any business to which Paragraph A of this Section X
7 applies, concerning matters relating to compliance with the terms
8 of this Order. The person interviewed may have counsel present.

9 **XI. DISTRIBUTION OF ORDER BY DEFENDANTS**

10 IT IS FURTHER ORDERED that, for a period of five (5) years
11 from the date of entry of this Order, Defendants shall:

12 A. Provide a copy of this Order to, and obtain a signed and
13 dated acknowledgment of receipt of same from, each officer or
14 director, each individual serving in a management capacity, all
15 personnel involved in responding to consumer complaints or
16 inquiries, and all sales personnel, whether designated as
17 employees, consultants, independent contractors or otherwise,
18 immediately upon employing or retaining any such persons, for any
19 business where (1) any Defendant is the majority owner of the
20 business or directly or indirectly manages or controls the
21 business, and where (2) the business is engaged in telemarketing,
22 or in advertising, offering for sale, or sale of any Work-At-Home
23 Opportunity or any good or service related to Medical Billing, or
24 in assisting others engaged in said activities; and

25 B. Maintain for a period of three (3) years after creation,
26 and upon reasonable notice, make available to representatives of
27 the Commission, the original signed and dated acknowledgments of
28 the receipt of copies of this Order, as required in Paragraph A of

1 this Section XI.

2 **XII. COMPLIANCE REPORTING BY DEFENDANTS**

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

5 A. For a period of five (5) years from the date of entry of
6 this Order, each Defendant shall notify the Commission of the
7 following: (1) any changes in Defendant's residence, mailing
8 address, and telephone numbers, within ten (10) calendar days of
9 the date of such change; and (2) any changes in Defendant's
10 employment status (including self-employment) within ten (10)
11 calendar days of such change. Such notice shall include the name
12 and address of each business that Defendant is affiliated with or
13 employed by, a statement of the nature of the business, and a
14 statement of Defendant's duties and responsibilities in connection
15 with the business or employment; and (3) any proposed change in the
16 structure of Defendant International Trader, or any business entity
17 owned or controlled by Defendant Bruce Anugwom, such as creation,
18 incorporation, dissolution, assignment, sale, merger, proposed
19 filing of a bankruptcy petition, change in the corporate name or
20 address, creation or dissolution of subsidiaries or affiliates, or
21 any other change that may affect compliance obligations arising out
22 of this Order, thirty (30) calendar days prior to the effective
23 date of any proposed change, or as soon as possible after Defendant
24 learns of the proposed change.

25 B. One hundred eighty (180) calendar days after the date of
26 entry of this Order, each Defendant shall submit a written report
27 to the Commission, sworn to under penalty of perjury, setting forth
28 in detail the manner and form in which they have complied and are

1 complying with this Order. This report shall include but not be
2 limited to:

3 1. Defendant's then current residence addresses and
4 telephone numbers;

5 2. Defendant's then current employment, business
6 addresses and telephone numbers, a description of the business
7 activities of each of Defendant's employers, and Defendant's title
8 and responsibilities for each such employer;

9 3. A copy of each acknowledgment of receipt of this
10 Order obtained pursuant to Paragraph A of Section XI of this Order;
11 and

12 4. A statement describing the manner in which Defendant
13 has complied with and is complying with this Order;

14 C. For a period of five (5) years from the date of entry of
15 this Order, upon written request by a representative of the
16 Commission, Defendants shall submit additional written reports
17 (under oath, if requested) and produce documents on fifteen (15)
18 calendar days' notice with respect to any conduct subject to this
19 Order;

20 D. For the purposes of this Order, Defendants shall, unless
21 otherwise directed by the Commission's authorized representatives,
22 mail all written communications to the Commission to:

23 Regional Director
24 Federal Trade Commission
25 55 East Monroe Street, Suite 1860
Chicago, Illinois 60603
Re: FTC v. International Trader

26 3. For the purposes of this Section XII, "employment"
27 includes the performance of services as an employee, consultant, or
28 independent contractor; and "employer" includes any individual or

1 entity for whom any Defendant performs services as an employee,
2 consultant, or independent contractor;

3 F. For purposes of the compliance reporting required by this
4 Section XII, the Commission is authorized to communicate directly
5 with Defendants.

6 **XIII. RETENTION OF JURISDICTION**

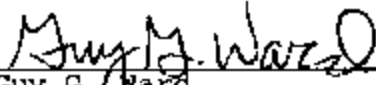
7 **IT IS FURTHER ORDERED** that this Court shall retain
8 jurisdiction over this matter and Defendants for purposes of the
9 construction, modification and enforcement of this Order.

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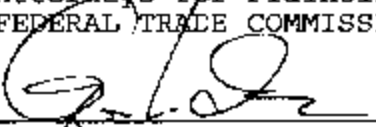
XIV. ENTRY OF THIS FINAL JUDGMENT

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2 IT IS FURTHER ORDERED, pursuant to Federal Rule of Civil
3 Procedure 54(b), that there is no just reason for delay and the
4 Clerk of Court immediately shall enter this Order as a final
5 judgment as to Defendants International Trader and Bruce Anugwom.

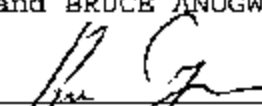
6 SO STIPULATED:

7 
8 Guy G. Ward
9 Therese M. McGrew
10 FEDERAL TRADE COMMISSION
11 55 East Monroe Street, Suite 1860
12 Chicago, Illinois 60603
13 (312) 960-5634 [Ph.]
14 (312) 960-5600 [Fax]
15 Attorneys for Plaintiff
16 FEDERAL TRADE COMMISSION

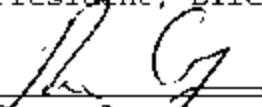
Dated: 9/12/02

17 
18 Gene W. Choe
19 LAW OFFICES OF GENE W. CHOE, P.C.
20 3699 Wilshire Blvd., Suite 720
21 Los Angeles, California 90010
22 (213) 639-3888
23 Attorney for Defendants
24 INTERNATIONAL TRADER
25 and BRUCE ANUGWOM

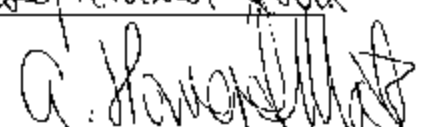
Dated: 7/26/02

26 
27 International Trader,
28 a Nevada corporation, by
29 Bruce Anugwom,
30 President, Director and Owner

Dated: 7/1/02

31 
32 Bruce Anugwom,
33 Individually

Dated: 7/1/02

34
35 SO ORDERED, this 15th day of September 2002
36
37 
38 A. Howard Matz
United States District Judge

1 Presented by:

2 Guy M. Ward

3 Guy G. Ward

4 Theresa M. McGrew

5 FEDERAL TRADE COMMISSION

6 55 East Monroe Street, Suite 1860

7 Chicago, Illinois 60603

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APPENDIX A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case No. CV-02-02701 AHM (JTLx)

_____)	
FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	AFFIDAVIT OF
)	DEFENDANT BRUCE ANUGWOM
INTERNATIONAL TRADER, et al.,)	
)	
Defendants.)	
_____)	

Bruce Anugwom, being duly sworn, hereby states and affirms as follows:

1. My name is Bruce Anugwom. I am a defendant in the above-captioned civil action. 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. My current business address is _____ . My current business telephone number is _____. My current residential address is _____ . My current residential telephone number is _____ .

3. On _____, I received a copy of the Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief ("Order"), which was signed by the Honorable A. Howard Matz and entered by the Court on _____. A true and correct copy of the Order that I received is appended to this Affidavit.

4. I reaffirm and attest to the truthfulness, accuracy and completeness of the Financial Statement of Defendant Bruce Anugwom that I executed on or about April 7, 2002 and submitted to the Federal Trade Commission.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on

_____, at _____.

[Date] [City, State]

Bruce Anugwon

State of _____, City of _____

Subscribed and sworn to before me
this ____ day of _____.

Notary Public
My Commission Expires:

1 Trader that I executed on or about April 7, 2002 and submitted to
2 the Federal Trade Commission.

3 I declare under penalty of perjury under the laws of the
4 United States that the foregoing is true and correct. Executed on
5 _____, at _____.

6 [Date]

7 [City, State]

8 _____
9 International Trader, a
10 Nevada corporation, by Bruce Anugwon,
11 President, Director and Owner

12 State of _____, City of _____

13 Subscribed and sworn to before me
14 this ____ day of _____.

15 _____
16 Notary Public
17 My Commission Expires:
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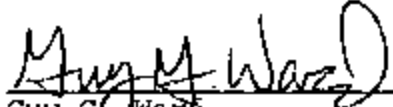
CERTIFICATE OF SERVICE

I, Guy G. Ward, hereby certify that on this day I caused to be served true copies of **Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief** on the following via Federal Express:

Gene W. Choe
Law Offices of Gene W. Choe, P.C.
3699 Wilshire Blvd., Ste. 720
Los Angeles, California 90010
(213) 639-3888

Byron Z. Moldo
Rein, Evans & Sestancovich LLP
Sixteenth Floor
1925 Century Park East
Los Angeles, CA 90067
(310) 551-3100

Dated: September 12, 2002



Guy G. Ward
Attorney for Plaintiff
Federal Trade Commission