

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 04-22289-Civ-Martinez/Bandsta

NIGHT BOX
FILED

JUL 21 2005

CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

FEDERAL TRADE COMMISSION,)
)
Plaintiff,)
)
v.)
)
CALL CENTER EXPRESS CORPORATION)
a corporation,)
)
EDGAR ALIRIO GONZALEZ and)
PABLO JOSE MARTINEZ,)
individually and as the sole members of)
CALL CENTER EXPRESS)
CORPORATION,)
)
ABREU ADVERTISING, INC.,)
a corporation,)
)
LIENS ABREU and)
RAFAEL L. ABREU)
individually and as the sole members of)
ABREU ADVERTISING, INC.)
d/b/a LA FAMILIA GROUP,)
)
PRO LINE CARD LLC,)
a limited liability corporation and)
)
CARLOS FELIPE MENDEZ,)
individually and a members of)
PRO LINE CARD LLC)
)
Defendants.)

STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT INJUNCTION
AS TO DEFENDANTS ABREU ADVERTISING INC., LIENS ABREU AND
RAFAEL L. ABREU

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), 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. §§ 6101-6108, filed its original Complaint for Injunctive and Other Relief, including redress to consumers and moved for a temporary restraining order (“TRO”) with asset freeze, appointment of a receiver and other equitable relief charging Defendants Call Center Express Corporation, Abreu Advertising, Inc., Pro Line Card LLC, Edgar Alirio Gonzalez, Pablo Jose Martinez, Liens Abreu, Rafael L. Abreu, Julio Cesar Sandoval and Carlos Felipe Mendez, with violating Section 5 of the FTC Act, 15 U.S.C. § 45 and the FTC’s Trade Regulation Rule entitled the “Telemarketing Sales Rule,” 16 C.F.R. Part 310, in conjunction with the offering for sale, telemarketing and sale of advance fee credit cards. The parties, represented by the attorneys whose names appear herein, have agreed to the entry of this Stipulated Final Judgment and Order for Permanent Injunction (“Order”) and have requested that the Court enter the same to resolve all matters of dispute between them in this action without trial or adjudication of any issue of law or fact herein.

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

FINDINGS

1. This is an action by the Commission instituted under Sections 5, 13(b) and 19 of the Federal Trade Commission Act, 15 U.S.C. §§ 45(a), 53(b) and 57b, and the Telemarketing Sales Rule, 16 C.F.R. Part 310. The Complaint seeks both permanent injunctive relief and consumer redress for alleged deceptive acts or practices by Defendants Abreu Advertising Inc., Liens Abreu and Rafael L. Abreu in connection with the promotion, offering for sale and sale of advance fee credit cards.

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2. Venue in the Southern District of Florida is proper as to all parties under 15 U.S.C. § 53(b), and 28 U.S.C. § 1391(b)-(d).

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

4. The Complaint states a claim upon which relief may be granted under Sections 5(a), 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 45(a), 53(b), and 57b and the Telemarketing Sales Rule, 15 U.S.C. § Section 6102(c) and 6105(b), and 28 U.S.C. §§ 1331, 1337(a) and 1345.

5. Defendants have entered into this Order freely and without coercion, and acknowledge that they have read the provisions of this Order and are prepared to abide by them.

6. Defendants waive all rights to seek judicial review or otherwise challenge or contest the validity of this Order, and further waive any claim Defendants may have against the Commission, the Receiver, or their employees or agents.

7. Defendants agree that this Order does not entitle Defendants to seek or to obtain attorneys’ fees as a prevailing party under the Equal Access to Justice Act, 28 U.S.C. § 2412, *as amended by* Pub. L. 104-121, 110 Stat. 847, 863-64 (1996), and Defendants further waive any right to attorneys’ fees that may arise under said provision of law.

8. Entry of this Order shall not constitute and shall not be interpreted to constitute either an admission by any Defendant or a finding by the Court as to allegations of the Complaint other than the jurisdictional facts.

9. Entry of this Order is in the public interest, and there being no just reason for delay, the Clerk is directed to enter judgment immediately.

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DEFINITIONS

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

1. "Plaintiff" means the Federal Trade Commission.
2. "Defendants" means Corporate Defendant and Individual Defendants.
3. "Corporate Defendant" means Abreu Advertising Inc.
4. "Individual Defendants" means Liens Abreu and Rafael L. Abreu.
5. "Receiver" means Lewis B. Freeman and Partners, Inc., the Permanent Receiver appointed by the Court in this matter.
6. "Assets" means 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, inventory, checks, notes, leaseholds, effects, contracts, mail or other deliveries, shares of stock, lists of consumer names, accounts, credits, premises, receivables, funds, and cash, wherever located.
7. "Assisting others" means: (1) performing customer service functions, including, but not limited to, receiving or responding to customer complaints, receiving identifying and financial information from consumers, and communicating with consumers about extensions of credit; (2) developing or 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.
8. "Advance Fee Credit Cards" means the advertisement, promotion, offering for sale, purported sale, or sale of any product or service represented to establish credit or debit accounts in exchange for a fee or similar payment by the purchaser prior to the issuance of a

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credit or debit account, including, but not limited to, a merchandise buying club membership card that offers an extension of credit.

9. "Document" is synonymous in meaning and equal in scope to the usage of the term 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, through detection devices into reasonably usable form. A draft or non-identical copy of a document is a separate document within the meaning of the term.

10. "Material" as used in Paragraphs I and II below means likely to affect a person's choice of, or conduct regarding, goods or services.

11. "Person" means a natural person, an organization or other legal entity, including a corporation, partnership, sole proprietorship, limited liability company, association, or cooperative, or any other group or combination acting as an entity.

12. "Telemarketing," "telemarketer," and "seller" as defined in Section 310.2 of the Telemarketing Sales Rule, 16 C.F.R. Part 310.

ORDER

I. PROHIBITED AGAINST VIOLATING THE FTC ACT

IT IS FURTHER ORDERED that in connection with the advertising, promotion, marketing, offering for sale, sale, or purported sale of any good or service, or assisting others in the same, Defendants and their successors, assigns, directors, officers, agents, servants, employees, attorneys 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,

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indirectly or through any corporation, subsidiary, division or other device, are hereby permanently restrained and enjoined from violating, in any manner, Section 5 of the FTC Act, 15 U.S.C. § 45, including, but not limited to, making or assisting in the making of, expressly or by implication, orally or in writing, any false or misleading statement or representation of material fact, including, but not limited to:

- A. Misrepresenting that after paying Defendants a fee, consumers are guaranteed or are likely to receive an unsecured major credit card, such as a VISA or MasterCard credit card and
- B. Misrepresenting any material aspect of the performance, efficacy, nature, or central characteristics of goods or services that are the subject of the sale.

II. PROHIBITION AGAINST VIOLATING THE TELEMARKETING SALES RULE

IT IS FURTHER ORDERED that in connection with the advertising, promotion, marketing, offering for sale, sale, or purported sale of any good or service, or assisting others in the same, Defendants and their successors, assigns, directors, officers, agents, servants, employees, attorneys 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, indirectly or through any corporation, subsidiary, division or other device, are hereby permanently restrained and enjoined from violating, in any manner, the Telemarketing Sales Rule, 16 C.F.R. Part 310, by including, but not limited to:

- A. Requesting or receiving payment of any fee or consideration in advance of obtaining a loan or other extension of credit when the seller or telemarketer has guaranteed or represented a high likelihood of success in obtaining or arranging a loan or

other extension of credit for a person as prohibited by § 310.4(a)(4);

B. Misrepresenting, any material aspect of the performance, efficacy, nature, or central characteristics of goods or services that are the subject of a sale as prohibited by § 310.3(a)(2)(iii);

C. Misrepresenting any material aspect of the nature or terms of the seller's refund, cancellation, exchange, or repurchase policies as prohibited by § 310.3(a)(2)(iv); and

D. Misrepresenting a seller's or telemarketer's affiliation with, or endorsement or sponsorship by, any person or government entity as prohibited by § 310.3(a)(2)(vii).

E. Failing to disclose truthfully, before a customer pays for goods or services offered, in a clear and conspicuous manner, in violation of § 310.3(a)(1), information, including, but not limited to:

1. The total cost to purchase, receive, or use, and the quantity of, any goods or services that are the subject of a sales offer;
2. All material restrictions, limitations, or conditions to purchase, receive, or use the goods or services that are the subject of the sales offer; and
3. If the seller has a policy of not making refunds, cancellations, exchanges, or repurchases, a statement informing the customer that this is the seller's policy; or, if the seller or telemarketer makes a representation about a refund, cancellation, exchange, or repurchase policy, a statement of all material terms and conditions of such policy.

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III. MONETARY RELIEF

IT IS FURTHER ORDERED that:

A. Judgment in the amount of THIRTEEN MILLION, NINE HUNDRED AND SEVENTY-EIGHT THOUSAND, NINE HUNDRED AND TWENTY-THREE DOLLARS (\$13,978,923.00) is hereby entered, jointly and severally, against Defendants, and their successors and assigns for equitable monetary relief and for paying any attendant expenses of administering any redress fund.

B. Based upon the representations of Defendants provided in their sworn financial disclosure statements and deposition testimony of September 23, 2004, and September 28, 2005, respectively, and related financial documents including, federal income tax forms, and subject to the reopening conditions set forth in Paragraph IV, the liability of Defendants is suspended upon payment by Defendants of TWENTY THOUSAND DOLLARS, (\$20,000.00) in the form of a cashier's check, to the Receiver within five (5) days of entry of this Order. All assets transferred to the Receiver pursuant to this paragraph will become part of the Receivership Estate as designated in this Court's October 5, 2004, Stipulated Preliminary Injunction Order as to Abreu Advertising Inc., Liens Abreu and Rafael L. Abreu, and shall be managed in accordance with the terms of that Order.

C. Defendants relinquish all right, title and interest to all frozen assets held by or on behalf of the Commission pursuant to the Stipulated Preliminary Injunction Order entered by this Court on October 5, 2004.

D. Upon final resolution of this case, all funds paid pursuant to this Paragraph shall

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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. 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 and education remedies) as it determines to be reasonably related to the Defendants' practices alleged in the Complaint. Any funds not used for such equitable relief shall be deposited to the Treasury as disgorgement. Defendants shall have no right to challenge the Commission's choice of remedies under this Paragraph. No portion of this judgment for equitable monetary relief shall be deemed a fine, penalty or punitive assessment, or forfeiture. The Commission shall have full and sole discretion to:

1. Determine the criteria for participation by individual claimants in any consumer redress program implemented pursuant to this Order;
2. Determine the manner and timing of any notices to be given to consumers regarding the existence and terms of such programs; and
3. Delegate any and all tasks connected with such redress programs to any individuals, partnerships, or corporations; and pay reasonable fees, salaries, and expenses incurred thereby from the payments made pursuant to this Order.

E. Defendants expressly waive their rights to litigate the issue of disgorgement.

Defendants acknowledge and agree that all money paid pursuant to this Order is irrevocably paid to the Commission for purposes of settlement between Plaintiff and Defendants.

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F. Upon entry of this Order, and payment in full received by the Commission pursuant to subparagraph B of this Paragraph, the freeze of Defendants' assets shall be lifted.

IV. RIGHT TO REOPEN AND TERMINATE SUSPENSION

IT IS FURTHER ORDERED that:

A. Within five (5) business days after entry of this Order, Defendants shall submit to the Commission a truthful sworn and notarized statement that shall acknowledge receipt of this Order and reaffirm and attest to the truthfulness, accuracy, and completeness of their financial statements originally dated September 23, 2004, related documents (collectively referred to as the "Financial Statements"), and sworn testimony, that were submitted to the Commission. The Commission is authorized to verify any information provided in the Financial Statements with any appropriate third party, including but not limited to, any financial institution or credit reporting bureau. The Commission's agreement to, and the Court's approval of, this Order is expressly premised upon the truthfulness, accuracy, and completeness of Defendants' financial condition as represented in the Financial Statements and sworn testimony given by Defendants Liens Abreu and Rafael L. Abreu on September 28, 2004, which contain material information relied upon by the Commission in negotiating and agreeing to the terms of this Order, and which shall be reaffirmed by Defendants pursuant to this Paragraph.

B. If the Commission should have evidence that Defendants failed to disclose, in the above-referenced Financial Statements and information, any material asset the value of which exceeds \$1,000.00, materially misrepresented the value of any asset, or made any

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other material misrepresentation or omission, the Commission may move the Court to reopen this Order for the purpose of allowing the Commission to modify the monetary liability of Defendants. If the Court finds that the Defendants 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 and information, the Court shall enter judgment against Defendants, in favor of the Commission, in the amount of THIRTEEN MILLION, NINE HUNDRED AND SEVENTY-EIGHT THOUSAND, NINE HUNDRED AND TWENTY-THREE DOLLARS (\$13,978,923.00) which Defendants and the Commission stipulate is the amount of consumer injury caused collectively by Defendants Call Center Express Corporation, Abreu Advertising, Inc., Pro Line Card LLC, Edgar Alirio Gonzalez, Pablo Jose Martinez, Liens Abreu, Rafael L. Abreu and Carlos Felipe Mendez, less any amounts previously paid, and such amount will become immediately due and payable. Should this judgment be modified as to the monetary liability of Defendants, this Order, in all other aspects, shall remain in full force. 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. Solely 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.

V. CUSTOMER LISTS

IT IS FURTHER ORDERED that Defendants, and their successors, assigns, directors, officers, agents, servants, employees, attorneys and all other persons or entities in active concert

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or participation with them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any corporation, subsidiary, division or other device, are hereby 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: (1) who paid money to, (2) solicited by, or (3) on a list maintained for future solicitation by Defendants, Abreu Advertising, Inc., Liens Abreu, Rafael Abreu, Call Center Express Corporation, Pro Line Card LLC, Edgar Alirio Gonzalez, Pablo Jose Martinez, or Carlos Felipe Mendez.

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 five (5) years from the date of entry of this Order,
 1. Each Individual Defendant shall notify the Commission of the following:
 - a. Any changes in the Individual Defendants' residence, mailing addresses, and telephone numbers, within ten (10) days of the date of such change;
 - b. Any changes in the Individual Defendants' employment status (including self-employment), and ownership of the Individual Defendants' 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 the Individual Defendants are affiliated with, employed by, create or form, or perform services for; a statement of the nature of the business; and a

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statement of the Individual Defendants' duties and responsibilities in connection with the business or employment; and

c. Any changes in the Individual Defendants' name or use of any aliases or fictitious names; and

2. Defendants shall notify the Commission of any changes in corporate structure or any business entity that each Defendant 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 the Defendants learn less than thirty (30) days prior to the date such action is to take place, Defendants 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 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 each Individual Defendant:

a. The then-current residence address, mailing addresses, and

telephone numbers of the Individual Defendant;

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

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

2. For all Defendants:

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

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

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

Commission to: Regional Director
Federal Trade Commission
Southeast Region
225 Peachtree Street, N.E., Ste. 1500
Atlanta, Georgia 30303
Re: *FTC v. Call Center Express Corporation, et al.*
Civil Action No. 04-22289-Civ-Martinez/Bandstra.

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

VII. AUTHORITY TO MONITOR COMPLIANCE

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 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 such Defendant's 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 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: Defendants' employees, or any other entity managed or controlled in whole or in part by the Defendants, 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)).

VIII. RECORD KEEPING PROVISIONS

IT IS FURTHER ORDERED that for a period of eight (8) years from the date of entry of this Order, in connection with any business where any Defendant is a majority owner, or directly or indirectly manages or controls a business, the Defendants and their agents, employees, officers, corporations, successors, and assigns, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, 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, phone 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

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receipt of this Order required by Paragraph IX, and all reports submitted to the FTC pursuant to Paragraph VI.

IX. DISTRIBUTION OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that for a period of five (5) years from the date of entry of this Order, Defendants shall deliver copies of the Order as directed below:

A. Corporate Defendant must deliver a copy of this Order to all of its principals, officers, directors, and managers. Corporate Defendant also must deliver copies of this Order to all of its 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 any Individual Defendant controls, directly or indirectly, or in which any Individual Defendant has a majority ownership interest, such Individual Defendant must deliver a copy of this Order to all principals, officers, directors, and managers of that business. Such Individual 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 (5) days of service of this Order upon Defendants. For new personnel, delivery shall occur prior to them assuming their responsibilities.

C. For any business where any Individual Defendant is not a controlling person of a business, but otherwise engages in conduct related to the subject matter of this Order, such Individual Defendant must deliver a copy of this Order to all principals and

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managers of such business before engaging in such conduct.

D. Corporate and Individual 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 Paragraph.

X. 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.

XI. RETENTION OF JURISDICTION

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

SO ORDERED, this ____ day of _____, 2005, at this hour of _____.

United States District Judge

The parties hereby stipulate and agree to the terms and conditions set forth above and consent to entry of this Stipulated Preliminary Injunction:

For Plaintiff, Federal Trade Commission:

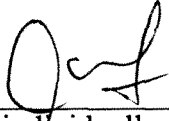
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Special Florida Bar Number A5500840
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Attorneys for Plaintiff
Federal Trade Commission
225 Peachtree Street, N.E., Ste. 1500

Date: 7/21/05

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Atlanta, Georgia 30303
Office: (404) 656-1350
Facsimile: (404) 656-1379

For Defendants:



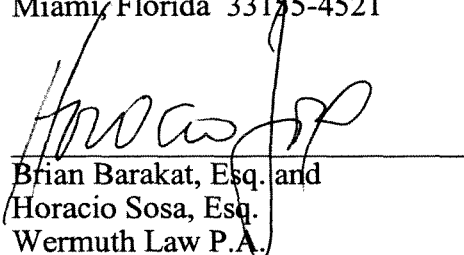
Liens Abreu, individually, and as the
Vice President of Abreu Advertising Inc.
formerly at 4299 S.W. 73rd Avenue
Miami, Florida 33155-4521

Date: 6/21/05



Rafael L. Abreu, individually, and as the
President of Abreu Advertising
formerly at 4299 S.W. 73rd Avenue
Miami, Florida 33155-4521

Date: 6/21/05



Brian Barakat, Esq. and
Horacio Sosa, Esq.
Wermuth Law P.A.
8750 N.W. 36th Street, Ste. 220
Miami, FL 33178
(305) 715-7157

Date: 6/21/05