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ENTERED
FEB - 5 2001
CLERK, U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA OFFICE
BY [Signature]

FILED
FEB - 2 2001
CLERK, U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION AT SANTA ANA
DEPUTY [Signature]

17 ATTORNEYS FOR PLAINTIFF
18 FEDERAL TRADE COMMISSION

CLERK, U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION AT SANTA ANA
DEPUTY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

Priority
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19 FEDERAL TRADE COMMISSION,
20 Plaintiff,
21 v.
22 GLOBAL NETWORK ENTERPRISES, INC.,
23 REPUBLIC ENTERPRISES, INC.,
24 CECILIA M. CASTILLO, and
25 IAN ANTHONY SUITE,
26 Defendants.

SACV 00-625GLT (ANX)

STIPULATED FINAL
JUDGMENT AND ORDER FOR
PERMANENT INJUNCTION AND
MONETARY RELIEF

→ Docketed
→ Copies / NTC Sent
+ JS - 5 / JS - 6
— JS - 2 / JS - 3
— CLSD

27 Plaintiff, the Federal Trade Commission ("FTC" or
28 "Commission"), commenced this action by filing a Complaint
pursuant to Sections 13(b) and 19 of the Federal Trade Commission
Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, and the

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FEB - 5 2001

1 Telemarketing and Consumer Fraud and Abuse Prevention Act, 15
2 U.S.C. § 6101 et seq., charging the defendants with engaging in
3 unfair or deceptive acts or practices in connection with the
4 marketing of prize promotions, in violation of Section 5 of the
5 FTC Act, 15 U.S.C. § 45, and the FTC's Telemarketing Sales Rule,
6 16 C.F.R. Part 310.

7 Now the Commission and defendants agree to a settlement of
8 this action without trial or adjudication of any issue of law or
9 fact herein and without the defendants admitting liability for
10 any of the violations alleged in the complaint or for any
11 wrongdoing whatsoever. The Commission and defendants consent to
12 entry of this Final Order without trial or adjudication of any
13 issue of law or fact herein.

14 Upon the consent of the parties hereto, **IT IS HEREBY**
15 **ORDERED, ADJUDGED, AND DECREED** as follows:

16 **FINDINGS**

- 17 1. This is an action by the Commission instituted under
18 Sections 5, 13(b), and 19 of the Federal Trade Commission
19 Act, 15 U.S.C. §§ 45, 53(b), and 57b, and the Telemarketing
20 Sales Rule, 16 C.F.R. Part 310. The Complaint seeks both
21 permanent injunctive relief and consumer redress for alleged
22 deceptive acts or practices by the defendants in connection
23 with a prize promotion. The Complaint states a claim upon
24 which relief may be granted against defendants under
25 Sections 5, 13(b), and 19 of the FTC Act, and the
26 Telemarketing Sales Rule.
- 27 2. This Court has jurisdiction over the subject matter of this
28 case and has jurisdiction over the defendants. Venue in the

1 Central District of California is proper.

2 3. The activities of defendants are in or affecting commerce,
3 as commerce is defined in 15 U.S.C. § 44.

4 4. Defendants waive all rights to seek judicial review or
5 otherwise challenge or contest the validity of this Order.
6 Defendants also waive any claim that they may hold under the
7 Equal Access to Justice Act, 28 U.S.C. § 2412 (as amended),
8 concerning the prosecution of this action to the date of
9 this Order. Defendants shall bear their own costs and
10 attorneys fees.

11 5. Entry of this Order is in the public interest.

12 6. This Order is remedial in nature and shall not be construed
13 as the payment of a fine, penalty, punitive assessment, or
14 forfeiture.

15
16 **DEFINITIONS**

17 For purposes of this Final Judgment and Order for Permanent
18 Injunction and Monetary Relief, the following definitions shall
19 apply:

20
21 1. "Telemarketing" shall mean any business activity (which
22 includes, but is not limited to, initiating or receiving
23 telephone calls, managing others who initiate or receive
24 telephone calls, operating an enterprise that initiates or
25 receives telephone calls, owning an enterprise that
26 initiates or receives telephone calls, or otherwise
27 participating as an officer, director, employee or
28 independent contractor in an enterprise that initiates or

1 receives telephone calls) that involves attempts to induce
2 consumers to purchase any item, good, service, partnership
3 interest, trust interest or other beneficial interest, or to
4 enter a contest for a prize, by means of telephone sales
5 presentations, either exclusively or in conjunction with the
6 use of other forms of marketing. *Provided* that the term
7 "telemarketing" shall not include transactions that are not
8 completed until after a face-to-face contact between the
9 seller or solicitor and the consumers solicited. *Provided*
10 *further*, that for the purposes of Paragraph I. C, the
11 definition of telemarketing shall be consistent with 16
12 C.F.R. § 310.2.

13 2. "**Person**" means any individual, group, unincorporated
14 association, limited or general partnership, corporation,
15 limited liability company, or other business entity.

16 3. "**Assets**" means all real and personal property of any
17 defendant, or held for the benefit of any defendant,
18 including but not limited to "goods," "instruments,"
19 "equipment," "fixtures," "general intangibles," "inventory,"
20 "checks," or "notes" (as these terms are defined in the
21 Uniform Commercial Code), lines of credit, and all cash,
22 wherever located.

23 4. "**Document**" is synonymous in meaning and equal in scope to
24 the usage of the term in Federal Rule of Civil Procedure
25 34(a) and includes writings, drawings, graphs, charts,
26 photographs, audio and video recordings, computer records,
27 and other data compilations from which the information can
28 be obtained and translated, if necessary, through detection

1 devices into reasonably usable form. A draft or non-
2 identical copy is a separate document within the meaning of
3 the term.

4 5. "Assisting others" means knowingly providing any of the
5 following goods or services to another entity: (1)
6 performing customer service functions, including, but not
7 limited to, receiving or responding to consumer complaints;
8 (2) formulating or providing, or arranging for the
9 formulation or provision of, any telephone sales script or
10 any other marketing material; (3) providing names of, or
11 assisting in the generation of, potential customers; or (4)
12 performing marketing services of any kind.

13 **ORDER**

14 **I. PROHIBITED BUSINESS ACTIVITIES**

15 A. **IT IS THEREFORE ORDERED** that, in connection with a prize
16 promotion or the advertising, marketing, promotion, or
17 offering of a prize, defendants Global Network Enterprises,
18 Inc., Republic Enterprises, Inc., Cecilia M. Castillo, and
19 Ian Anthony Suite, and each of them, and their successors,
20 assigns, officers, members, agents, directors, servants,
21 employees, and those persons in active concert or
22 participation with them who receive actual notice of this
23 Order by personal service or otherwise, whether acting
24 directly or through any corporation, subsidiary, division or
25 other device, are hereby permanently restrained and enjoined
26 from:

27 1. Falsely representing, expressly or by implication, that
28 consumers will receive a prize;

1 2. Falsely representing, expressly or by implication, that
2 consumers' checking, savings, share, or similar
3 accounts would not be debited until after consumers had
4 received their prizes; and

5 3. Falsely representing, directly or by implication, any
6 fact material to a consumer's decision to participate
7 in a prize promotion.

8 B. **IT IS FURTHER ORDERED** that, with respect to the advertising,
9 marketing, promoting, offering for sale, or sale of any
10 goods or services, defendants Global Network Enterprises,
11 Inc., Republic Enterprises, Inc., Cecilia M. Castillo, and
12 Ian Anthony Suite, and each of them, and their successors,
13 assigns, officers, members, agents, directors, servants,
14 employees, and those persons in active concert or
15 participation with them who receive actual notice of this
16 Order by personal service or otherwise, whether acting
17 directly or through any corporation, subsidiary, division or
18 other device, are hereby permanently restrained and enjoined
19 from misrepresenting, expressly or by implication, any fact
20 material to a consumer's decision to purchase defendants'
21 products or services.

22 C. **IT IS FURTHER ORDERED** that defendants Global Network
23 Enterprises, Inc., Republic Enterprises, Inc., Cecilia M.
24 Castillo, and Ian Anthony Suite, and each of them, and their
25 successors, assigns, officers, members, agents, directors,
26 servants, employees, and those persons in active concert or
27 participation with them who receive actual notice of this
28 Order by personal service or otherwise, whether acting

1 directly or through any corporation, subsidiary, division or
2 other device, are hereby permanently restrained and enjoined
3 from violating or assisting others in violating any
4 provision of the Telemarketing Sales Rule, 16 C.F.R. Part
5 310, including but not limited to:

- 6 1. misrepresenting that consumers have won a prize in a
7 prize promotion; and
- 8 2. misrepresenting that consumers will receive a prize in
9 a prize promotion if they make a required payment.

10
11 **II. CUSTOMER LISTS**

12 **IT IS FURTHER ORDERED** that defendants Global Network
13 Enterprises, Inc., Republic Enterprises, Inc., Cecilia M.
14 Castillo, and Ian Anthony Suite, and each of them, and their
15 successors, assigns, officers, members, agents, directors,
16 servants, employees, and those persons in active concert or
17 participation with them who receive actual notice of this Order
18 by personal service or otherwise, whether acting directly or
19 through any corporation, subsidiary, division or other device,
20 are hereby permanently restrained and enjoined from selling,
21 renting, leasing, transferring, or otherwise disclosing the name,
22 address, telephone number, social security number, or other
23 identifying information of any person contacted by defendants in
24 connection with a prize promotion or the advertising, marketing,
25 promotion, or offering of a prize at any time prior to the date
26 this Order is entered. Provided, however, that the defendants
27 may disclose such identifying information to a law enforcement
28 agency or as required by any law, regulation, or court order.

1 III. BOND REQUIREMENT

2 IT IS FURTHER ORDERED that each of the defendants Global
3 Network Enterprises, Inc., Republic Enterprises, Inc., Cecilia M.
4 Castillo, and Ian Anthony Suite, whether acting directly or
5 indirectly through any persons or entities under such defendant's
6 control, is hereby permanently restrained and enjoined from
7 engaging in or assisting others engaged in (1) telemarketing and
8 (2) the marketing of prize promotions or the advertising,
9 marketing, promotion, or offering of a prize, unless, prior to
10 engaging in or assisting others engaged in such activities, such
11 defendant first obtains a performance bond ("the Bond") in the
12 principal sum of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00).

13 The terms and conditions of the Bond requirement are as follows:

14 A. The Bond shall be conditioned upon compliance with Section
15 5(a) of the FTC Act, 15 U.S.C. § 45(a), the Telemarketing
16 Sales Rule, 16 C.F.R. Part 310, and with the provisions of
17 this Order. The Bond shall be deemed continuous and remain
18 in full force and effect as long as such defendant is
19 engaging in or assisting others engaged in telemarketing or
20 in the marketing of prize promotions or the advertising,
21 marketing, promotion, or offering of a prize. Such
22 defendant shall maintain the Bond for a period of five (5)
23 years after such defendant provides notice to the Commission
24 that such defendant has ceased engaging in or assisting
25 others engaged in telemarketing or in the marketing of prize
26 promotions or the advertising, marketing, promotion, or
27 offering of a prize. The Bond shall cite this Order as the
28 subject matter of the Bond, and shall provide surety

1 thereunder against financial loss resulting from whole or
2 partial failure of performance due, in whole or in part, to
3 any violation of Section 5(a) of the FTC Act, the
4 Telemarketing Sales Rule, or the provisions of this Order,
5 or to any other violation of law;

6 B. The Bond required pursuant to this Paragraph shall be an
7 insurance agreement providing surety for financial loss
8 issued by a surety company that is admitted to do business
9 in each state in which such defendant, or any entity
10 directly or indirectly under such defendant's control, is
11 doing business and that holds a Federal Certificate of
12 Authority As Acceptable Surety On Federal Bond and
13 Reinsuring. The Bond shall be in favor of both: (1) the
14 Federal Trade Commission for the benefit of any consumer
15 injured as a result of any activities that required
16 obtaining the Bond; and (2) any consumer so injured;

17 C. The Bond required pursuant to this Paragraph is in addition
18 to, and not in lieu of, any other bonds required by federal,
19 state, or local law;

20 D. At least ten (10) days before commencing in any activity
21 that requires obtaining the Bond, such defendant shall
22 provide notice to the Commission describing in reasonable
23 detail said activities, and include in such notice a copy of
24 the Bond obtained; and

25 E. Such defendant shall not disclose the existence of the Bond
26 to any consumer without simultaneously making the following
27 disclosure: "THE BOND IS REQUIRED BY ORDER OF THE U.S.
28 DISTRICT COURT AS PART OF A FINAL ORDER AGAINST [name of

1 such defendant] FOR ALLEGED MISREPRESENTATIONS IN A PRIZE
2 PROMOTION in *FTC v. Global Network Enterprises, Inc., et*
3 *al., SACV-00-625GLT(ANX), U.S. District Court for the*
4 *Central District of California.*" The disclosure shall be
5 set forth in a clear and conspicuous manner, separated from
6 all other text, in 100 percent black ink against a light
7 background, in print at least as large as the main text of
8 the sales material or document, and enclosed in a box
9 containing only the required disclosure.

10
11 **IV. MONETARY RELIEF**

12 **IT IS FURTHER ORDERED** that defendants Global Network
13 Enterprises, Inc., Republic Enterprises, Inc., Cecilia M
14 Castillo, and Ian Anthony Suite shall be jointly and severally
15 liable for payment of equitable monetary relief, including, but
16 not limited to, consumer redress and/or disgorgement, and for
17 paying any attendant expenses of administration of any redress
18 fund, in the amount of EIGHT HUNDRED THOUSAND DOLLARS (\$800,000).
19 Provided, however, that this judgment shall be suspended until
20 further order of the Court pursuant to Paragraph V of this Order.

21
22 **V. FINANCIAL STATEMENT**

23 **IT IS FURTHER ORDERED** that the Commission's agreement to and
24 the Court's approval of this Order are expressly premised upon
25 the truthfulness, accuracy, and completeness of the financial
26 statements and information provided by defendants Global Network
27 Enterprises, Inc., Republic Enterprises, Inc., Cecilia M.
28 Castillo, and Ian Anthony Suite to counsel for the Commission on

1 or about August 18, 2000, which contain material information
2 relied upon by the Commission in negotiating and agreeing to the
3 terms of this Order.

4 **IT IS FURTHER ORDERED** that if the Commission should have
5 evidence that the above-referenced financial statements and
6 information failed to disclose any material asset the value of
7 which exceeds \$1,000, materially misrepresented the value of any
8 asset, or made any other material misrepresentation or omission,
9 the Commission may move that the Court reopen this Order for the
10 sole purpose of allowing the Commission to modify the monetary
11 liability of such defendant(s). If the Court finds that any
12 defendant(s) failed to disclose any material asset, materially
13 misrepresented the value of any asset, or made any other material
14 misrepresentation or omission in the above-referenced financial
15 statements and information, the Court shall reinstate the
16 suspended judgment against such defendant(s), in favor of the
17 Commission, in the amount of EIGHT HUNDRED THOUSAND DOLLARS
18 (\$800,000), as set forth in Paragraph IV of this Order.
19 Provided, however, that in all other respects this Order shall
20 remain in full force and effect unless otherwise ordered by the
21 Court. Any proceedings instituted under this Paragraph shall be
22 in addition to and not in lieu of any other proceedings the
23 Commission may initiate to enforce this Order. Solely for the
24 purposes of reopening or enforcing this Paragraph, defendants
25 waive any right to contest any of the allegations set forth in
26 the Complaint filed in this matter.

27
28

1 by personal service or otherwise, whether acting directly or
2 through any corporation, subsidiary, division or other device, in
3 connection with any business where such defendant is the majority
4 owner of the business or directly or indirectly manages or
5 controls the business, are hereby restrained and enjoined from
6 failing to create, and from failing to retain for a period of
7 three (3) years following the date of such creation, unless
8 otherwise specified:

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

13 B. Records accurately reflecting: the name, address, and
14 telephone number of each person employed in any capacity by
15 such business, including as an independent contractor; that
16 person's job title or position; the date upon which the
17 person commenced work; and the date and reason for the
18 person's termination, if applicable. The businesses subject
19 to this Paragraph shall retain such records for any
20 terminated employee for a period of three (3) years
21 following the date of termination;

22 C. Records containing the names, addresses, phone numbers,
23 dollar amounts paid, quantity of items or services
24 purchased, and description of items or services purchased,
25 for all consumers to whom such business has sold, invoiced
26 or shipped any goods or services, or from whom such business
27 accepted money or other items of value;

28 D. Records that reflect, for every consumer complaint or refund

1 request, whether received directly or indirectly or through
2 any third party:

3 (1) the consumer's name, address, telephone number and the
4 dollar amount paid by the consumer;

5 (2) the written complaint or refund request, if any, and
6 the date of the complaint or refund request;

7 (3) the basis of the complaint, including the name of any
8 salesperson complained against, and the nature and
9 result of any investigation conducted concerning any
10 complaint;

11 (4) each response and the date of the response;

12 (5) any final resolution and the date of the resolution;
13 and

14 (6) in the event of a denial of a refund request, the
15 reason for the denial; and

16 E. Copies of all sales scripts, training materials,
17 advertisements, or other marketing materials utilized;
18 *provided* that copies of all sales scripts, training
19 materials, advertisements, or other marketing materials
20 utilized shall be retained for three (3) years after the
21 last date of dissemination of any such materials.

22
23 **VIII. DISTRIBUTION OF ORDER BY DEFENDANTS**

24 **IT IS FURTHER ORDERED** that, for a period of five (5) years
25 from the date of entry of this Order, defendants Global Network
26 Enterprises, Inc., Republic Enterprises, Inc., Cecilia M.
27 Castillo, and Ian Anthony Suite shall each:

28 A. Provide a copy of this Order to, and obtain a signed and

1 dated acknowledgment of receipt of same from, each officer
2 or director, each individual serving in a management
3 capacity, all personnel involved in responding to consumer
4 complaints or inquiries, and all sales personnel, whether
5 designated as employees, consultants, independent
6 contractors or otherwise, immediately upon employing or
7 retaining any such persons, for any business where such
8 defendant is the majority owner of the business or directly
9 or indirectly manages or controls the business.

10 B. Maintain for a period of three (3) years after creation, and
11 upon reasonable notice, make available to representatives of
12 the Commission, the original signed and dated
13 acknowledgments of the receipt of copies of this Order, as
14 required in Section A of this Paragraph.

15
16 **IX. COMPLIANCE REPORTING BY DEFENDANTS**

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

19 A. For a period of five (5) years from the date of entry of
20 this Order, defendants Global Network Enterprises, Inc.,
21 Republic Enterprises, Inc., Cecilia M. Castillo, and Ian
22 Anthony Suite shall each notify the Commission of the
23 following:

- 24 (1) Any changes in such defendant's residence, mailing
25 addresses, and telephone numbers, within ten (10) days
26 of the date of such change;
- 27 (2) Any changes in such defendant's employment status
28 (including self-employment) within ten (10) days of

1 such change. Such notice shall include the name and
2 address of each business that defendant is affiliated
3 with or employed by, a statement of the nature of the
4 business, and a statement of defendant's duties and
5 responsibilities in connection with the business or
6 employment; and

7 (3) Any proposed change in the structure of such corporate
8 defendant or any proposed change in the structure of
9 any business entity owned or controlled by such
10 individual defendant such as creation, incorporation,
11 organization, dissolution, assignment, sale, merger,
12 creation, dissolution of subsidiaries, proposed filing
13 of a bankruptcy petition, or change in name or address,
14 or any other change that may affect compliance
15 obligations arising out of this Order, thirty (30) days
16 prior to the effective date of any proposed change;
17 provided, however, that, with respect to any proposed
18 change in the corporation or limited liability company
19 about which such defendant learns less than thirty (30)
20 days prior to the date such action is to take place,
21 such defendant shall notify the Commission as soon as
22 is practicable after learning of such proposed change;

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

1 (1) Defendants' then current residence addresses and
2 telephone numbers;

3 (2) Individual defendants' then current employment,
4 business addresses and telephone numbers, a description
5 of the business activities of each such employer, and
6 individual defendants' title and responsibilities for
7 each employer;

8 (3) A copy of each acknowledgment of receipt of this Order
9 obtained by defendants pursuant to Paragraph VIII;

10 (4) A statement describing the manner in which defendants
11 have complied and are complying with the

12 (a) Injunctive provisions in Paragraph I of the
13 Order; and

14 (b) Monetary relief provisions in Paragraph IV of the
15 Order;

16 C. Upon written request by a representative of the Commission,
17 defendants shall submit additional written reports (under
18 oath, if requested) and produce documents on fifteen (15)
19 days' notice with respect to any conduct subject to this
20 Order;

21 D. For the purposes of this Order, defendants shall, unless
22 otherwise directed by the Commission's authorized
23 representatives, mail all written notifications to the
24 Commission to:

25 Regional Director
26 Southwest Region
27 Federal Trade Commission
28 Suite 2150, 1999 Bryan Street
Dallas, Texas 75201

Re: *FTC v. Global Network Enterprises, Inc., et al., SACV-*
00-625GLT (ANX)

- 1 E. For the purposes of this Paragraph, "employment" includes
2 the performance of services as an employee, consultant, or
3 independent contractor; and "employers" includes any
4 individual or entity for whom defendants perform services as
5 an employee, consultant, or independent contractor; and
6 F. For purposes of the compliance reporting required by this
7 Paragraph, the Commission is authorized to communicate
8 directly with defendants.

9
10 **X. COMMISSION'S AUTHORITY TO MONITOR COMPLIANCE**

11 **IT IS FURTHER ORDERED** that the Commission is authorized to
12 monitor defendants' compliance with this Order by all lawful
13 means, including but not limited to, the following means:

- 14 A. The Commission is authorized, without further leave of
15 court, to obtain discovery from any person in the manner
16 provided by Chapter V of the Federal Rules of Civil
17 Procedure, Fed. R. Civ. P. 26-37, including the use of
18 compulsory process pursuant to Fed. R. Civ. P. 45, for the
19 purpose of monitoring and investigating defendants'
20 compliance with any provision of this Order;
21 B. The Commission is authorized to use representatives posing
22 as consumers and suppliers to defendants, defendants'
23 employees, or any other entity managed or controlled in
24 whole or in part by defendants, without the necessity of
25 identification or prior notice; and
26 C. Nothing in this Order shall limit the Commission's lawful
27 use of compulsory process, pursuant to Sections 9 and 20 of
28 the FTC Act, 15 U.S.C. §§ 49 and 57b-1, to investigate

1 whether defendants have violated any provision of this Order
2 or Section 5 of the FTC Act, 15 U.S.C. § 45.
3

4 **XI. ACCESS TO BUSINESS PREMISES**

5 **IT IS FURTHER ORDERED** that, for a period of five (5) years
6 from the date of entry of this Order, for the purpose of further
7 determining compliance with this Order, defendants Global Network
8 Enterprises, Inc., Republic Enterprises, Inc., Cecilia M.
9 Castillo, and Ian Anthony Suite shall permit representatives of
10 the Commission, within three (3) business days of receipt of
11 written notice from the Commission:

12 A. Access during normal business hours to any office, or
13 facility storing documents, of any business where such
14 defendant is the majority owner of the business or directly
15 or indirectly manages or controls the business. In
16 providing such access, such defendant shall permit
17 representatives of the Commission to inspect and copy all
18 documents relevant to any matter contained in this Order;
19 and shall permit Commission representatives to remove
20 documents relevant to any matter contained in this Order for
21 a period not to exceed five (5) business days so that the
22 documents may be inspected, inventoried, and copied; and

23 B. To interview the officers, directors, and employees,
24 including all personnel involved in responding to consumer
25 complaints or inquiries, and all sales personnel, whether
26 designated as employees, consultants, independent
27 contractors or otherwise, of any business to which Section
28 A of this Paragraph applies, concerning matters relating to

1 compliance with the terms of this Order. The person
2 interviewed may have counsel present.

3 *Provided that, upon application of the Commission and for good*
4 *cause shown, the Court may enter an ex parte order granting*
5 *immediate access to defendants' business premises for the*
6 *purposes of inspecting and copying all documents relevant to any*
7 *matter contained in this Order.*

8
9 **XII. ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANTS**

10 **IT IS FURTHER ORDERED** that, within five (5) business days
11 after receipt by defendants Global Network Enterprises, Inc.,
12 Republic Enterprises, Inc., Cecilia M. Castillo, and Ian Anthony
13 Suite of this Order as entered by the Court, each defendant shall
14 submit to the Commission a truthful sworn statement, in the form
15 shown on Appendix A hereto, that shall acknowledge receipt of
16 this Order.

17
18 **XIII. LIFT OF ASSET FREEZE**

19 **IT IS FURTHER ORDERED** that the freeze of the defendants'
20 assets, imposed in the Preliminary Injunction entered in this
21 proceeding, shall be lifted upon the entry of this Final
22 Judgment.


23
24 **XIV. RETENTION OF JURISDICTION**

25 **IT IS FURTHER ORDERED** that the Court shall retain
26 jurisdiction of this matter for the purpose of enabling the
27 parties to apply to the Court at any time for such further orders
28 and directions as may be necessary or appropriate for the

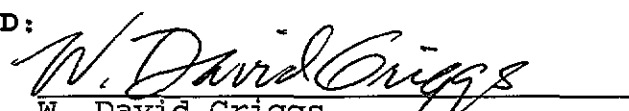
1 interpretation, modification or enforcement of this Order, or for
2 the punishment of violations thereof.

3 The parties hereby consent to the terms and conditions of
4 the Stipulated Final Judgment and Order for Permanent Injunction
5 and Monetary Relief as set forth above and consent to entry
6 thereof.

7 IT IS SO ORDERED, this 1st day of February, 2008.


8
9
10 
11 Gary L. Taylor
United States District Judge

12 IT IS SO STIPULATED:

13 
14 W. David Griggs
15 Thomas B. Carter
ATTORNEYS FOR PLAINTIFF
Federal Trade Commission

16
17 
18 Cecilia M. Castillo
DEFENDANT

19
20 
21 Ian Anthony Suite
DEFENDANT

22
23 
24 Global Network Enterprises, Inc.
25 by Cecilia M. Castillo, President
DEFENDANT

26
27 
28 Republic Enterprises, Inc.
by Cecilia M. Castillo, President
DEFENDANT

1
2 UNITED STATES DISTRICT COURT
3 CENTRAL DISTRICT OF CALIFORNIA
4 SOUTHERN DIVISION

5 FEDERAL TRADE COMMISSION,

6 Plaintiff,

7 v.

8 GLOBAL NETWORK ENTERPRISES,
9 INC.,

10 REPUBLIC ENTERPRISES, INC.,

11 CECILIA M. CASTILLO, and

12 IAN ANTHONY SUITE,

13 Defendants.

SACV 00-625GLT (ANX)

AFFIDAVIT OF
[NAME OF DEFENDANT]

[APPENDIX A]

14 AFFIDAVIT OF [NAME OF DEFENDANT]

15 [Name of defendant], being duly sworn, hereby states and
16 affirms as follows:

17 1. My name is [_____]. My social security
18 number is [_____]. My current residence address
19 is [_____]. I am a citizen of the United
20 States and am over the age of eighteen. I have personal
21 knowledge of the facts set forth in this Affidavit.

22 2. I am a defendant in *FTC v. Global Network Enterprises,*
23 *Inc., et al., SACV-00-625GLT (ANX)* in the United States District
24 Court for the Central District of California, Southern Division.

25 3. On _____, 2001, I received a copy of the
26 Stipulated Final Judgment and Order for Permanent Injunction and
27 Monetary Relief, which was signed by the Honorable Gary L. Taylor
28 and entered by the Court on _____, 2001. A true and

1 correct copy of the Order I received is attached to this
2 Affidavit.

3 I declare under penalty of perjury under the laws of the United
4 States that the foregoing is true and correct. Executed on
5 _____, 2001, at _____.

6

7

8

Name of Defendant

9

10

11

12 State of _____, City of _____

13

14

Subscribed and sworn to before me

15

this _____ day of _____, 2001.

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17

Notary Public

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My Commission Expires:

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