

FILED APR 16 2003

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

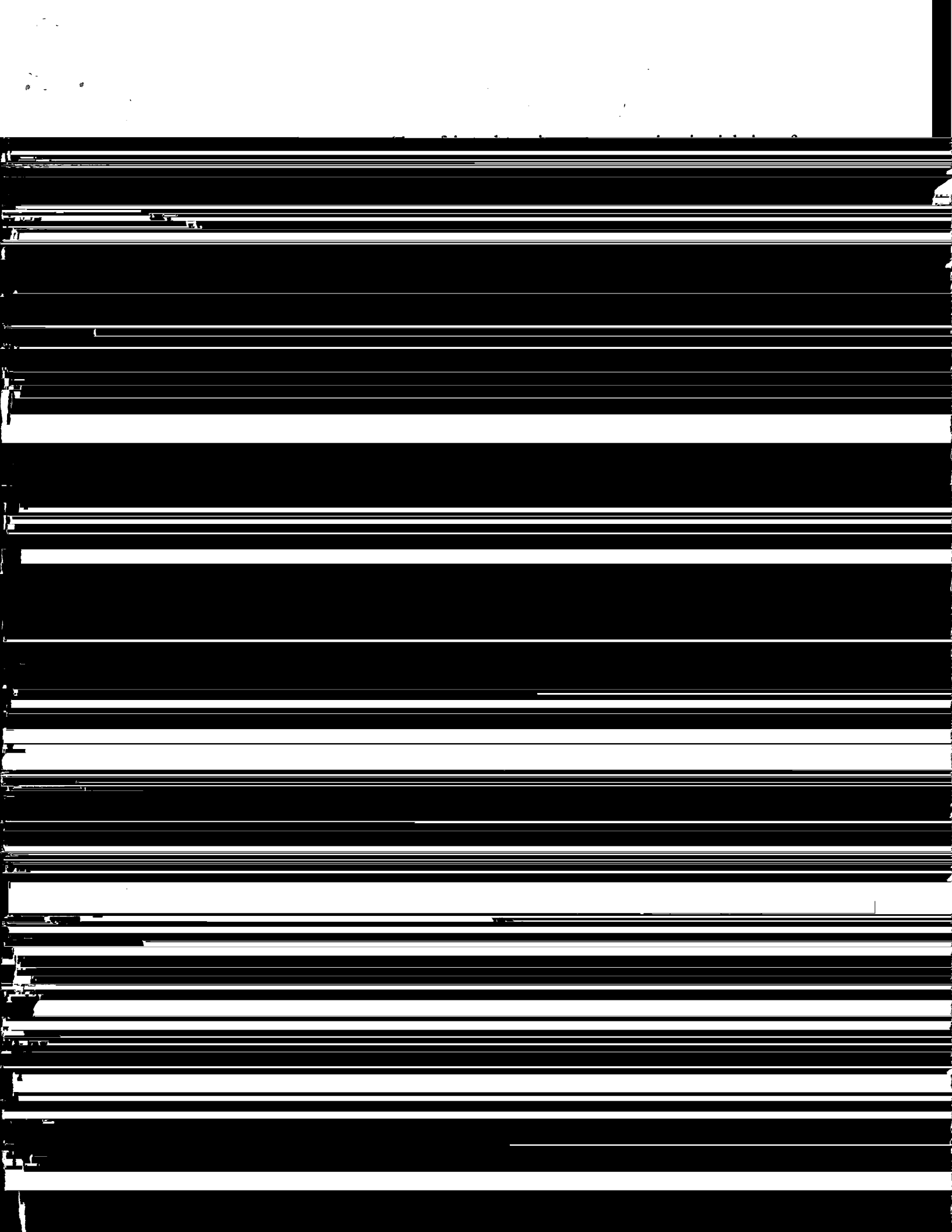
vs.

MORRONE'S WATER ICE, INC.,  
a Pennsylvania corporation;  
FRANCHISE CONSULTANTS CORPORATION,  
a Pennsylvania corporation, d/b/a  
FRANCHISE CONSULTANTS GROUP;  
ICE AMERICA CORPORATION,  
a Pennsylvania corporation;

CIVIL ACTION

No. 02-3720

RECEIVED



5- [REDACTED] LD-C-1 [REDACTED] through their counsel have agreed that the entry

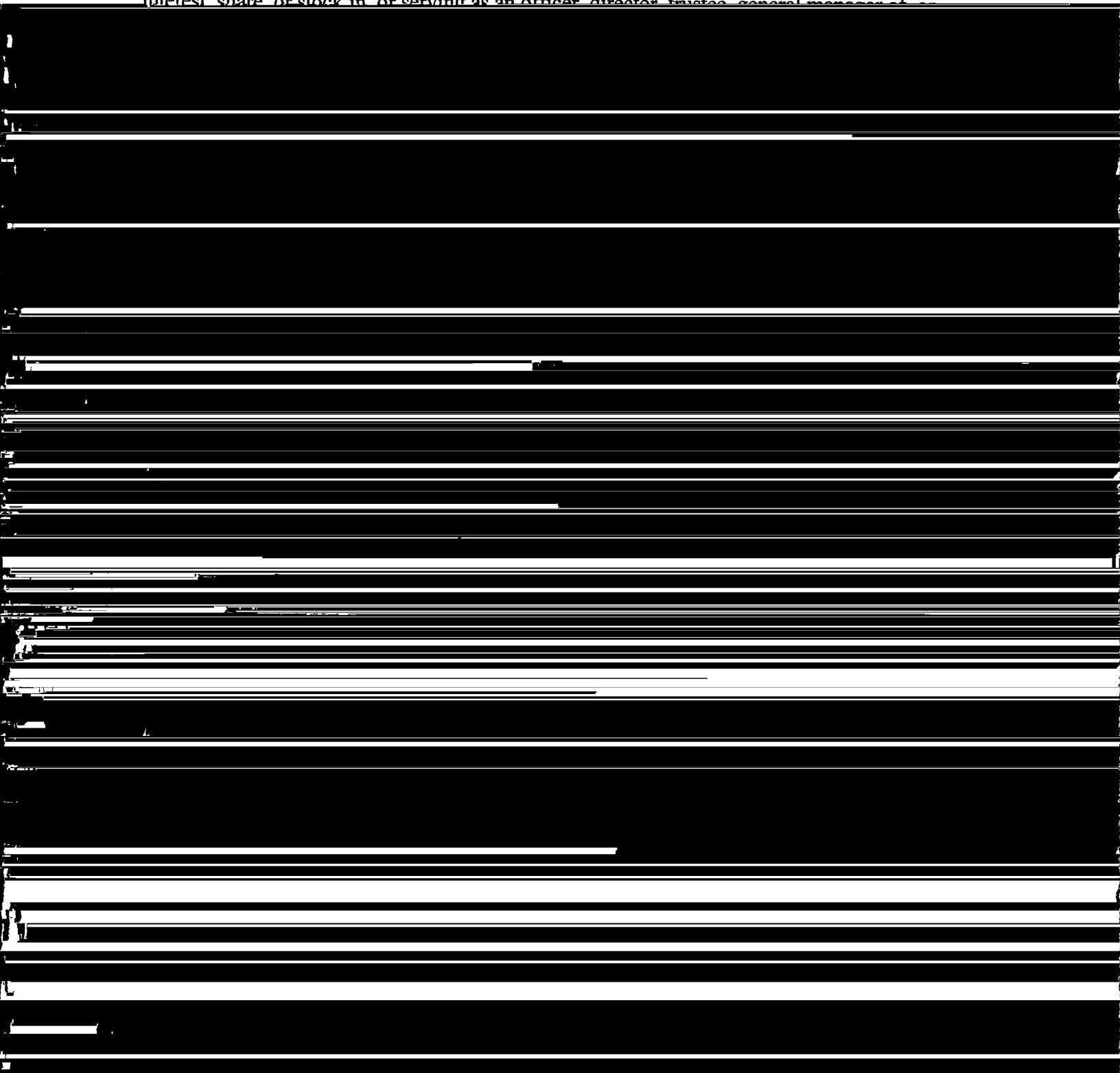
[REDACTED]

b. More than nominal assistance to any person or entity in connection with or

or the entry by an existing business into a new line or type of business.

A. Advertising, marketing, promoting, offering for sale, or selling any business venture, whether directly, indirectly, in concert with others, or through any intermediary, business entity, or other device; and

B. Receiving any remuneration of any kind whatsoever from holding any ownership interest share or stock in or serving as an officer, director, trustee, general manager of an



pending a final ruling by the court or arbitrator, and disburse the funds only as directed by the court or arbitrator.

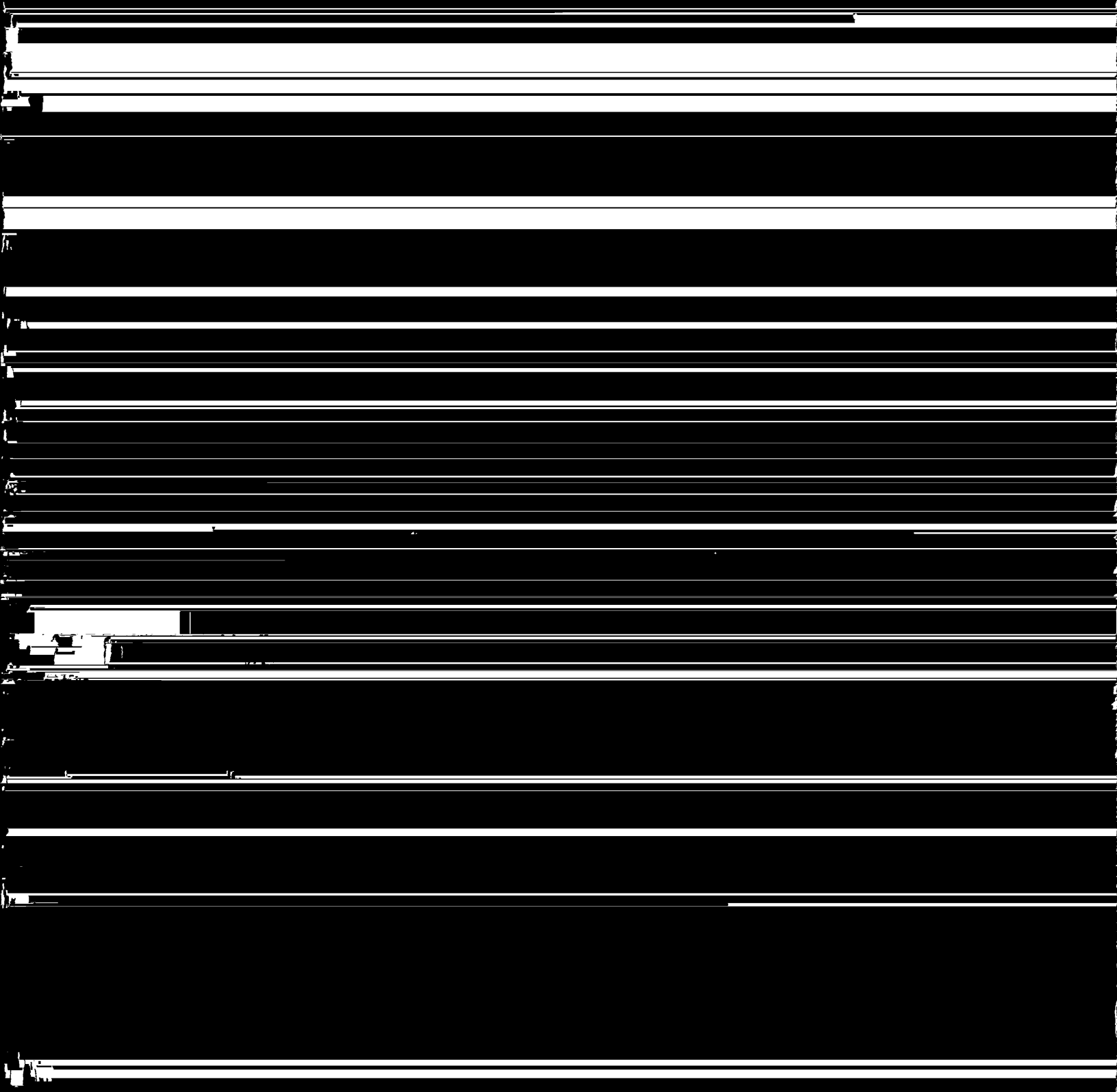
**III. VIOLATIONS OF SECTION 5 OF THE FTC ACT PROHIBITED**

~~IT IS FURTHER ORDERED that in connection with these advertising practices, Section~~



B. Failing to provide a prospective purchaser with an earnings claim document as required by the Franchise Rule, 16 C.F.R. § 436.1(b)-(e);

C. Failing to have a reasonable basis for any earnings claim at the time of the sale;



and delivered to the Commission, or by wire transfer in accord with directions provided by the Commission.

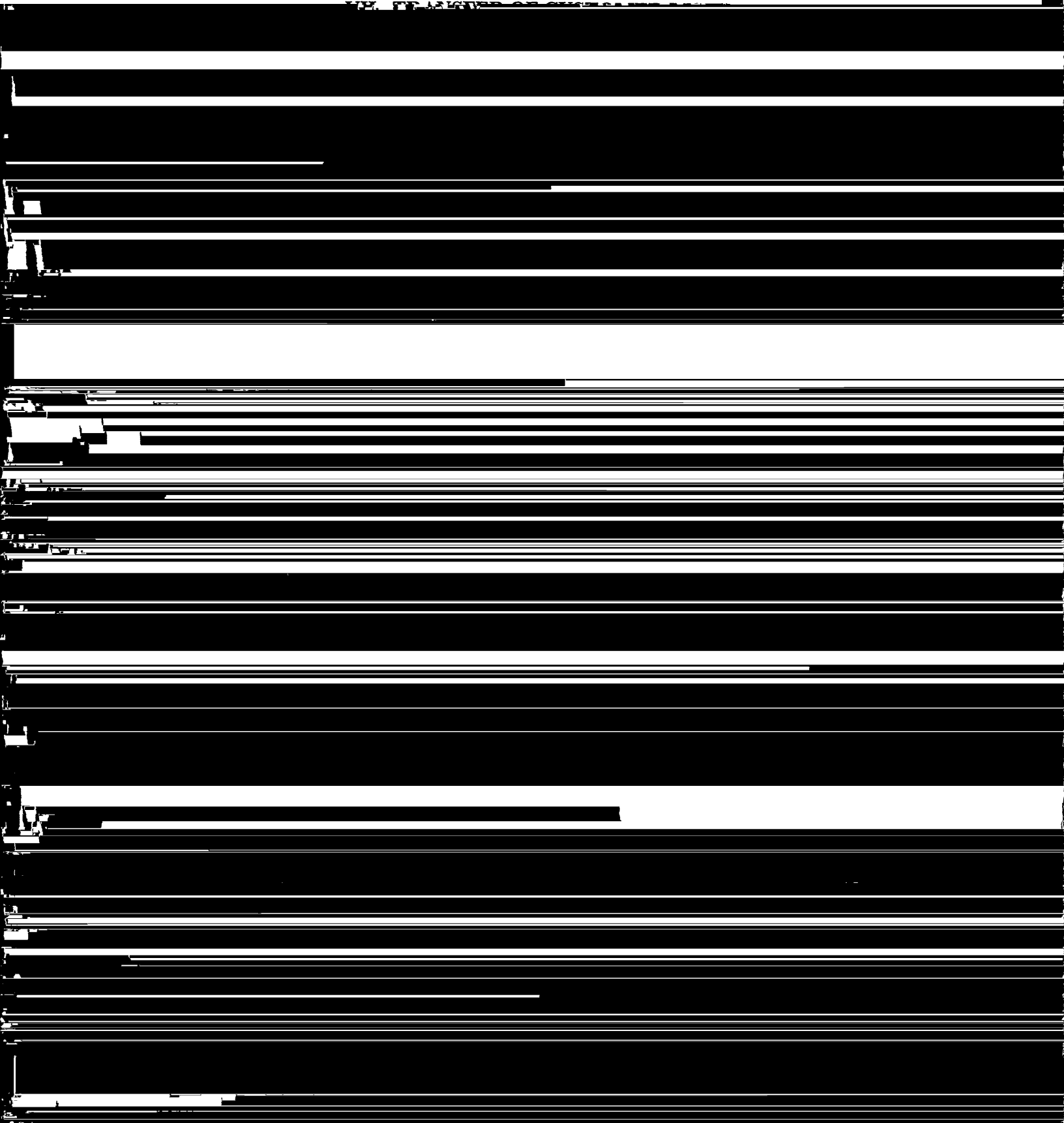
B. All funds paid pursuant to this Paragraph shall be deposited into a fund administered by the Commission or its agent to be used for equitable relief, including but not limited to consumer redress and any attendant expenses for the administration of any redress fund. In the event that redress to purchasers is wholly or partially impracticable, or any funds remain after redress is completed, the Commission may apply any remaining funds for such other

equitable relief (including consumer information remedies) as it determines to be reasonable.



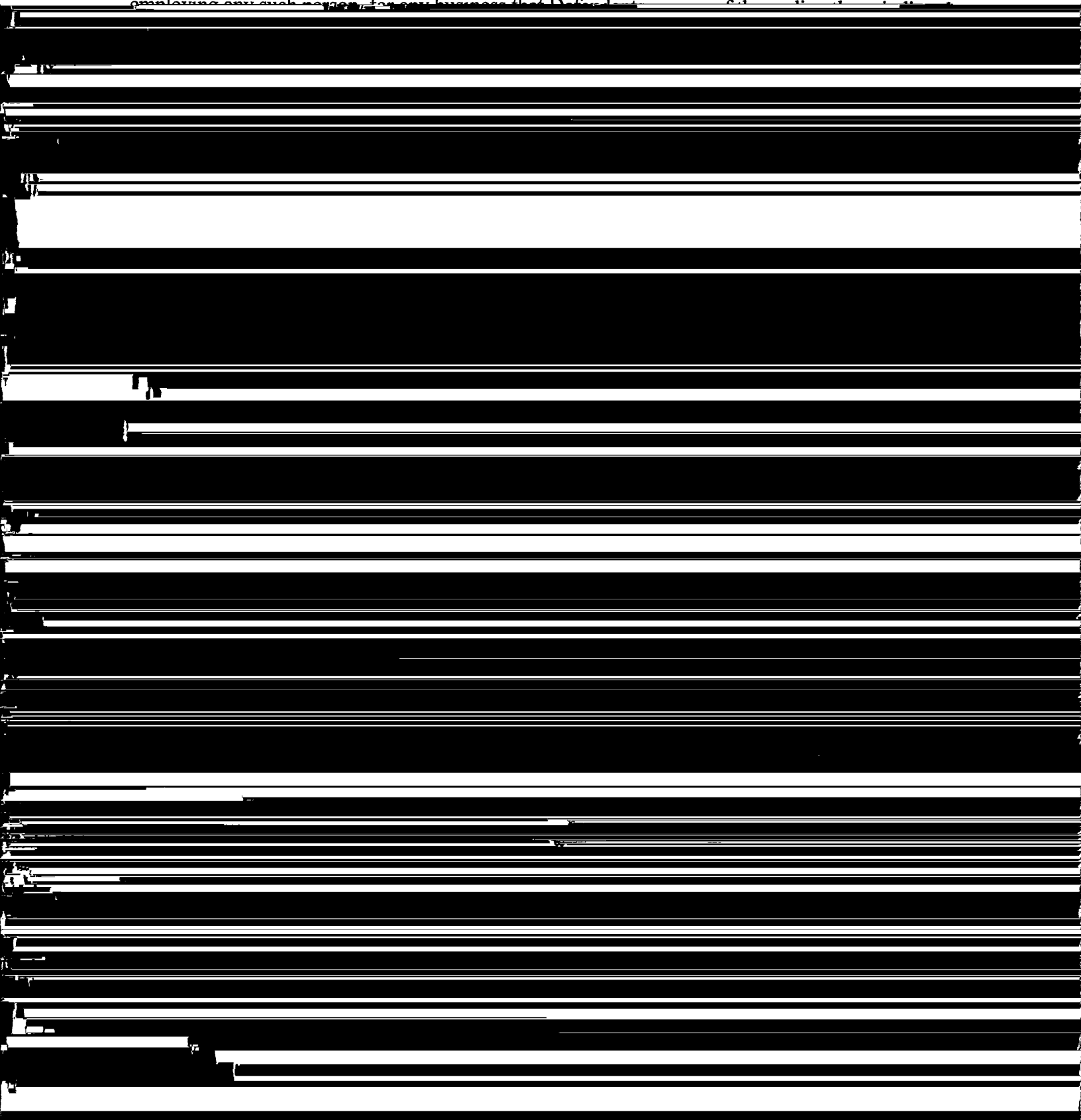
which the parties stipulate is the amount of the judgment to which the Commission is entitled in

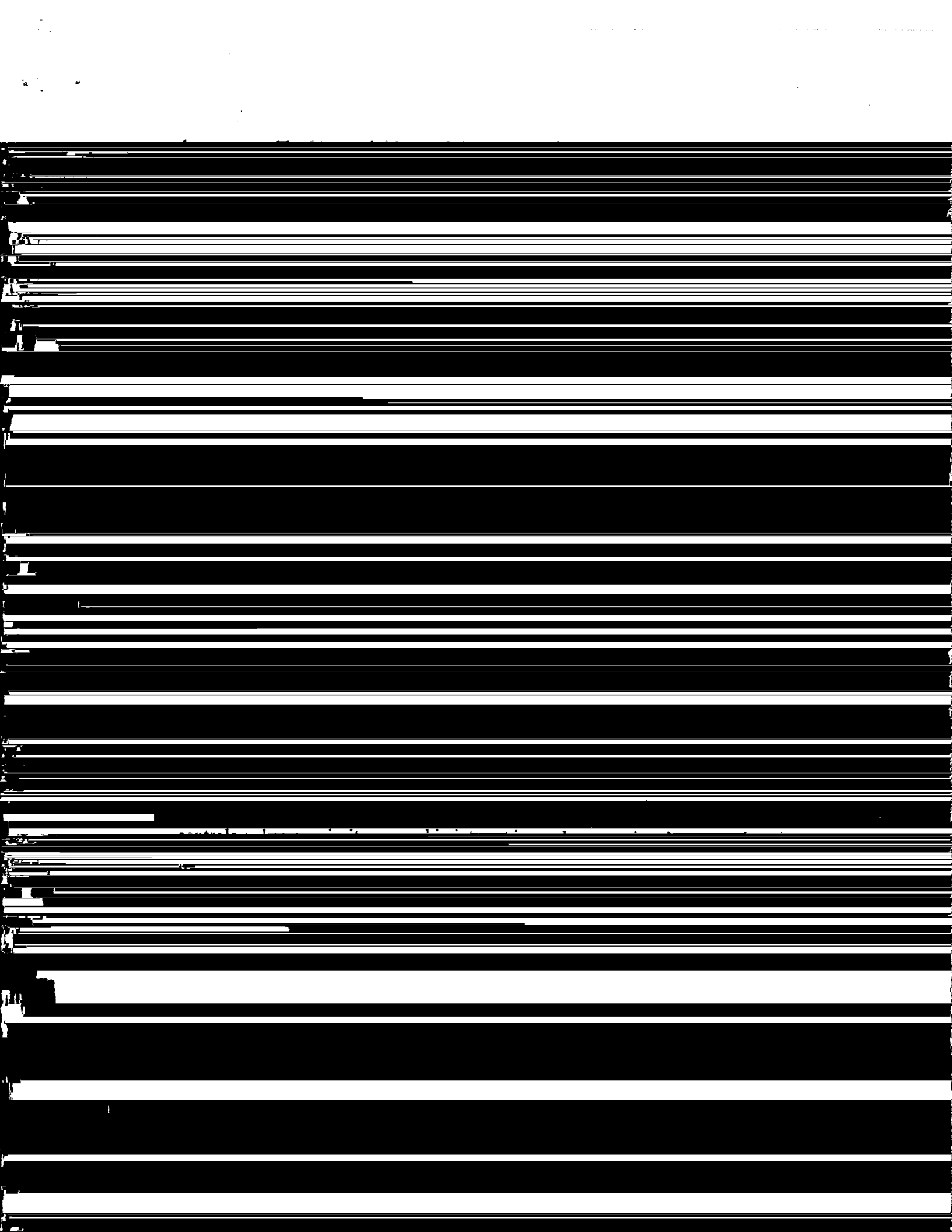
elects to void his or her contract shall be eligible to receive redress from the funds provided by Paragraph IV of this Order.



within five (5) business days after receipt of this Order, and thereafter immediately upon

~~employing any such person for any business that De Facto~~

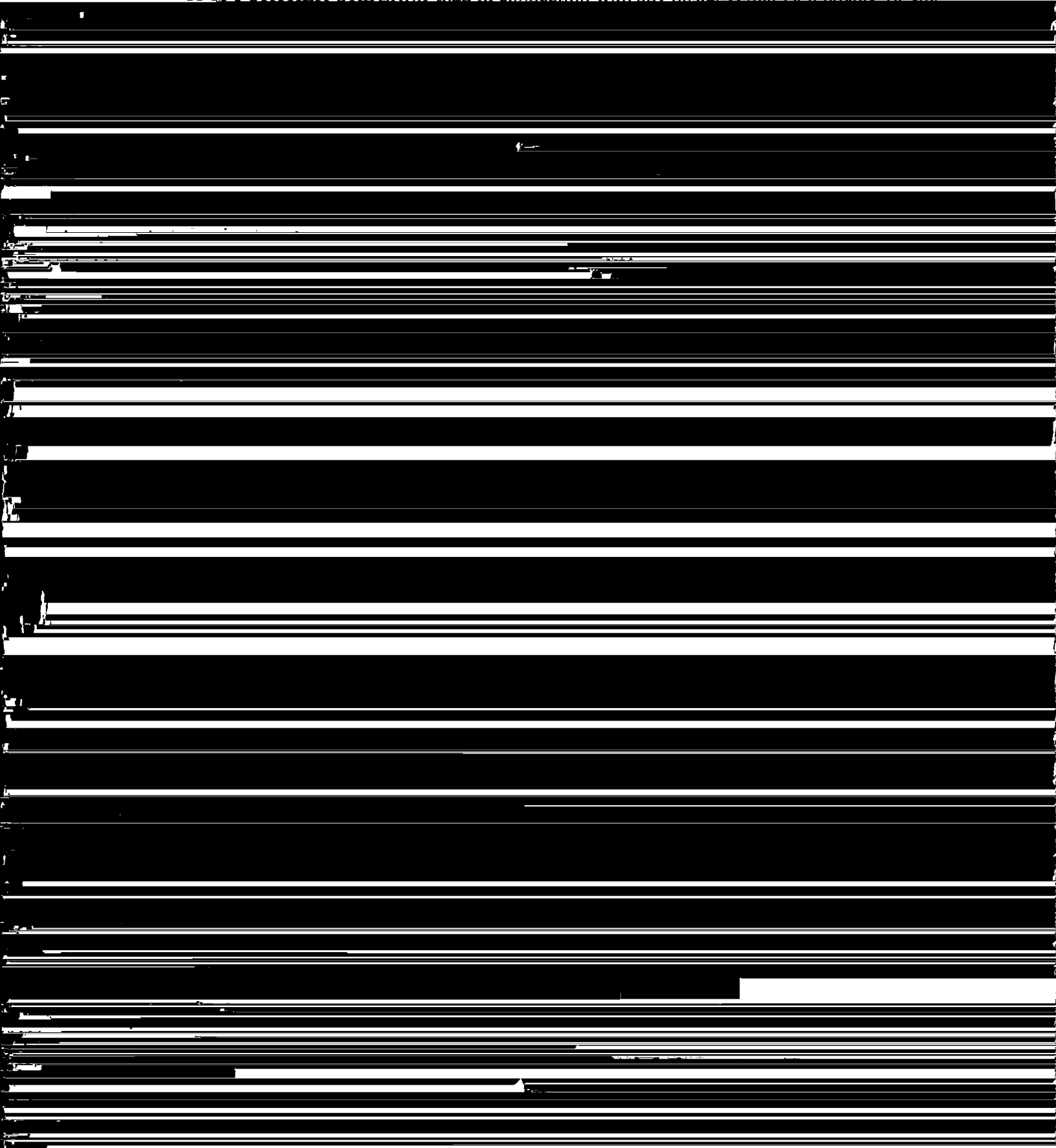


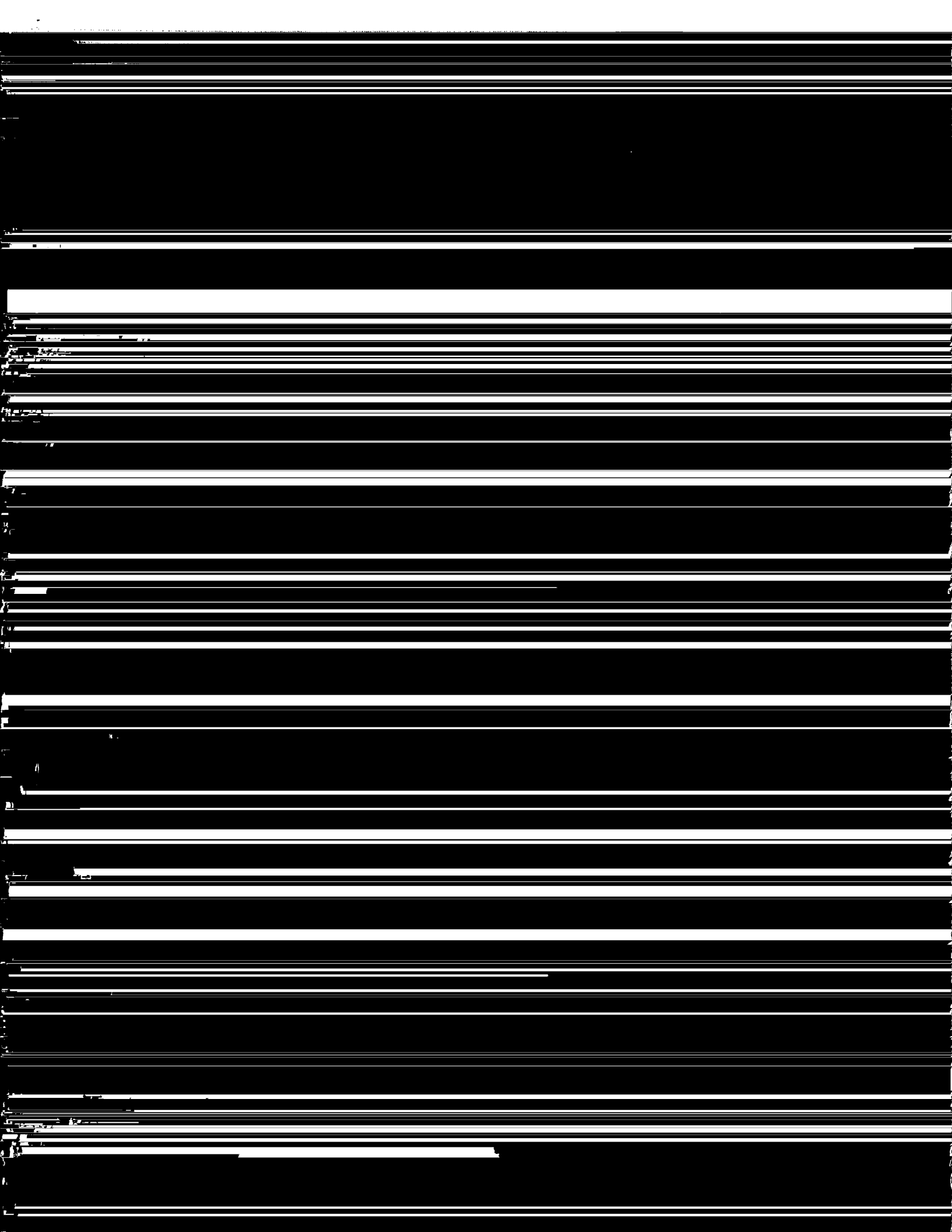


[REDACTED]

**XI. MONITORING COMPLIANCE OF SALES PERSONNEL**

IT IS FURTHER ORDERED that, in connection with any business that Defendants or any





**XIII. ACCESS TO BUSINESS PREMISES**

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*Provided however that...*

FTC Act, 15 U.S.C. § 45, or any applicable rule or regulation promulgated and enforced by the Commission.

#### **XV. EFFECT OF ORDER**

IT IS FURTHER ORDERED that the rights and remedies provided by this Order shall be in addition to, and not in lieu of, any other rights and remedies that may be provided by applicable law.

#### **XVI. FEES AND COSTS**

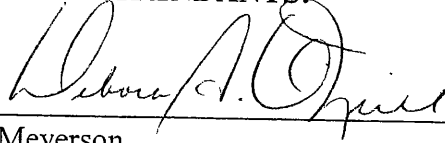
IT IS FURTHER ORDERED that each party to this Order have a reasonable opportunity to be heard.

**FOR THE PLAINTIFF:**

William E. Kovacic  
General Counsel

Tara M. Flynn

**FOR THE DEFENDANTS:**



Jack Meyerson  
Debora A. O'Neill

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FEDERAL TRADE COMMISSION,

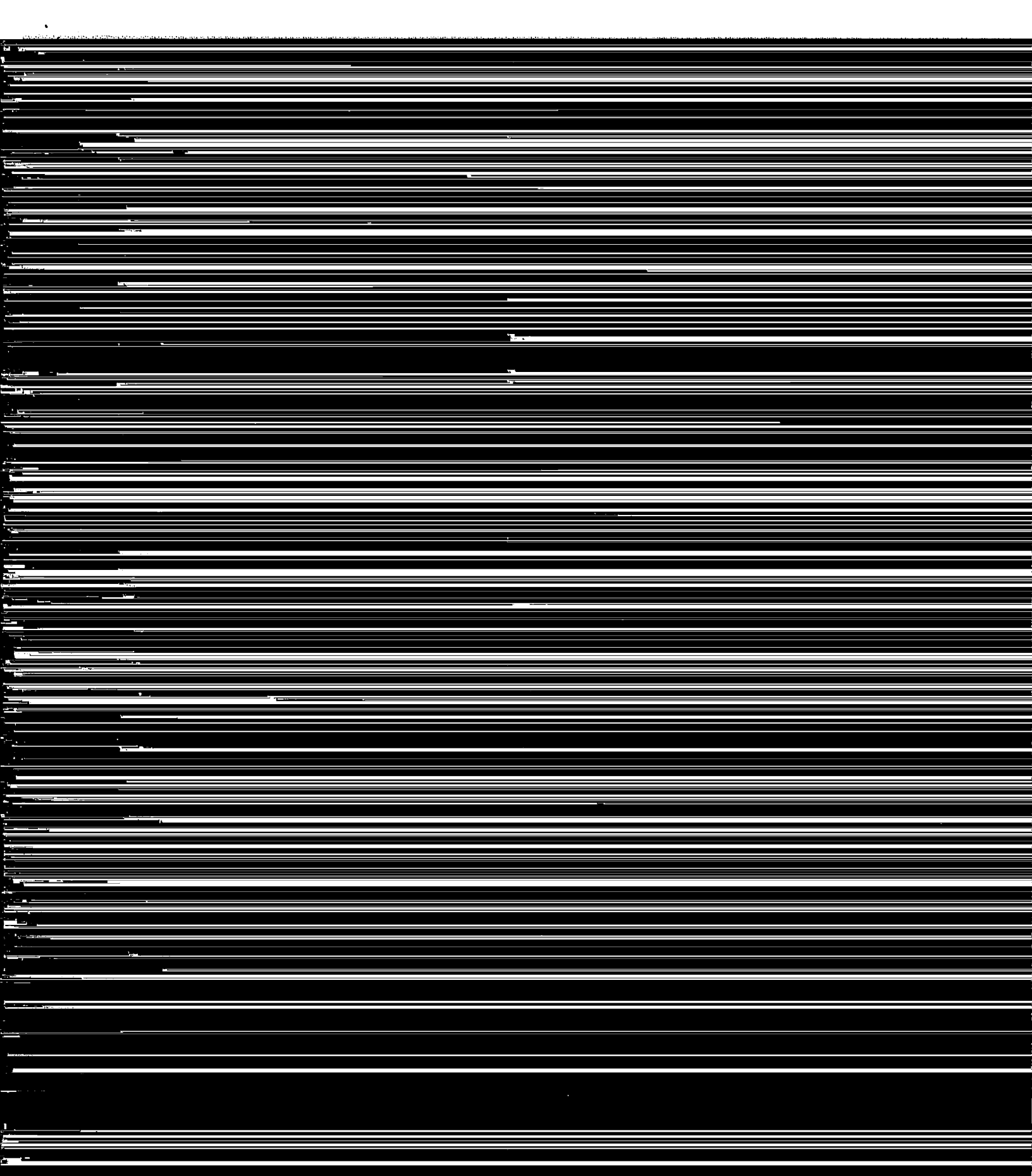
Plaintiff,

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a Pennsylvania corporation;  
FRANCHISE CONSULTANTS CORPORATION,  
a Pennsylvania corporation 1/1/76

CIVIL ACTION

NO. 02-3720



2. [Illegible text]

Certification of Service by Federal Express Mail

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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