

Ventures (the "Franchise Rule"), 16 C.F.R. Part 436, and that the Commission is therefore likely to prevail on the merits of this action;

3. There is good cause to believe that irreparable harm will result from UCC's and Raz's alleged violations of Section 5 of the FTC Act and the Franchise Rule, 16 C.F.R. Part 436.

are restrained and enjoined by Order of this Court;

4. There is good cause to believe that irreparable damage to the Court's ability to grant effective final relief for consumers in the form of monetary restitution will occur from the

the right of persons to offer and distribute securities.

- advertising, or other commercial symbol); and
- b. more than nominal assistance to any person or entity in connection with or incident to the establishment, maintenance, or operation of a new business or the entry by an existing business into a new line or type of business;

2 "Corporate Defendants" means AFD, AFD II, IFSB, and IFCO, and their

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III. ASSET FREEZE

IT IS FURTHER ORDERED that Defendants are hereby enjoined from:

1. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, disseminating, disbursing, assigning, spending, withdrawing, creating a lien or security

interest or other interest in, or otherwise disposing of any funds, real or personal property, accounts, contracts, consumer lists, shares of stock, or other assets, or any interest therein, wherever located, that are: (1) owned or controlled by UCC or Paz, in whole or in part, for the benefit of UCC or Paz (2) in the actual possession, custody, or control of UCC or Paz

2. Deny Defendants access to any safe deposit box that is titled in the name, individually or jointly or otherwise subject to access by UCC or Paz;

3. Provide the Commission's counsel and the Receiver, within five (5) business days

a. the identification number of each such account or asset titled in the name, individually or jointly or otherwise subject to access by UCC or Paz;

b. the balance of each such account, or a description of the nature and value

~~PAID BY THE BANK~~

and maintain documents that, in reasonable detail, accurately, fairly, and completely reflect the

incomes, disbursements, transactions, and use of money of or by UCC or Paz.

or jointly of UCC or Paz; or (2) held by any person or entity, for the benefit of UCC or Paz; or (3) under UCC's or Paz's direct or indirect control, whether jointly or singly,

3. Provide the Commission access to all records of accounts or assets of UCC and Paz held by financial institutions located outside the territorial United States by signing the

Consent to Release of Financial Records attached to this Order as Attachment C

IX. INTERFERENCE WITH REPATRIATION

the Receivership Defendant, including any Individual Defendant, from control of, management of or participation in the affairs of the Receivership Defendant.

2. Take exclusive custody, control and possession of all assets and documents of or

in the possession, custody, or under the control of, the Receivership Defendant, wherever situated. The Receiver shall have full power to divert mail and to sue for collect receive take in

possession, hold, and manage all assets and documents of the Receivership Defendant and other persons or entities whose interests are now under the direction, possession, custody, or control of, the Receivership Defendant. The Receiver shall

4. Conserve, hold, and manage all assets of the Receivership Defendant, and perform all acts necessary or advisable to preserve the value of those assets in order to prevent any irreparable loss, damage, or injury to consumers or creditors of the Receivership Defendant, including, but not limited to, obtaining an accounting of the assets and preventing the unauthorized transfer, withdrawal, or misapplication of assets;

mandate under this Order, including but not limited to, actions challenging fraudulent or voidable transfers;

12. ~~Define the scope of the Receiver's mandate under this Order.~~

proceedings instituted in the past or in the future against the Receiver in his role as Receiver, or against the Receivership Defendant, as the Receiver deems necessary and advisable to preserve the assets of the Receivership Defendant or as the Receiver deems necessary and advisable to

carry out the Receiver's mandate under this Order;

13. Issue subpoenas to obtain documents and records pertaining to the receivership, and conduct discovery in this action on behalf of the receivership estate.

including franchises; (4) any substantiation for such earnings claims; (5) the number of purchasers of Defendants' business ventures, including franchises, and the amount they paid for

to the Court.

VII TRANSFER OF REGISTERED SERVICE

XIII. PROVISION OF INFORMATION TO RECEIVER

~~IT IS FURTHER ORDERED THAT~~

~~immediately on receipt of the~~

1. A list of all assets and property, including accounts, of the Receivership

Defendant that are held in any name other than the name of the Receivership Defendant, or by any person or entity other than a Receivership Defendant; and

2. A list of all agents, employees, officers, servants or those persons in active concert

of, the assets or documents subject to this receivership;

2. Transacting any of the business of the Receivership Defendant:

Provided that, this Order does not stay: (i) the commencement or continuation of a criminal action or proceeding; (ii) the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or (iii) the enforcement of a judgment, other than a money judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory

copying materials relevant to this action. The Receiver shall have the discretion to determine the

time, manner, and reasonable conditions of such access

[REDACTED]

IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 26(d), discovery may commence at any time after the entry of this Order.

XX SERVICE BY ELECTRONIC MEANS

[REDACTED]

IT IS FURTHER ORDERED that copies of this Order may be served by any means,

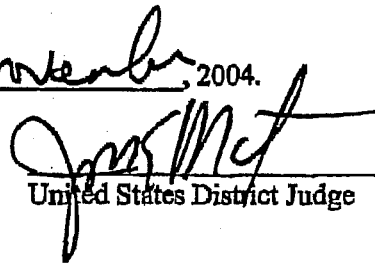
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commercial carrier for delivery at this address.

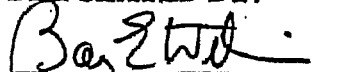
XXIV. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

SO ORDERED, this 24 day of November, 2004.


United States District Judge

STIPULATED BY:


Barry E. Witlin, Esq.


Deborah Matties