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CLERK, U.S. DISTRICT COURT

OCT - 7 2005

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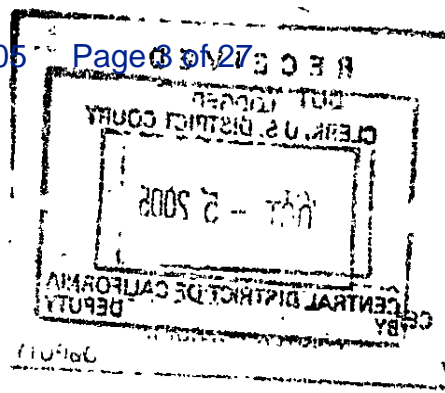
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UNITED STATES DISTRICT COURT

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1 consumer redress for Defendants' alleged deceptive acts or
2 practices in connection with the marketing and sale of
3 instructional programs.

4 2. The FTC has the authority pursuant to Section 13(b) and
5 19 of the FTC Act to seek the relief it has requested and the

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DEFINITIONS

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

ANNEX

1 however, that the term "telemarketing" shall not include (a)
2 transactions that are not completed until after a face-to-face
3 contact between the seller or solicitor and the consumers
4 solicited, and the consumer is not required to pay or authorize
5 payment until after such a presentation; or (b) the solicitation
6 of sales through the mailing of a catalog which contains a
7 written description or illustration of the goods or services
8 offered for sale. Includes the business address of the seller.

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1 arranges for others to provide goods or services to the customer

2 in exchange for consideration whether or not such person is under (b)

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

6 B. The performance bond required pursuant to this Section

7 shall be in the form of an insurance agreement providing surety

1 without also disclosing clearly and prominently, at the same

[REDACTED]

[REDACTED]

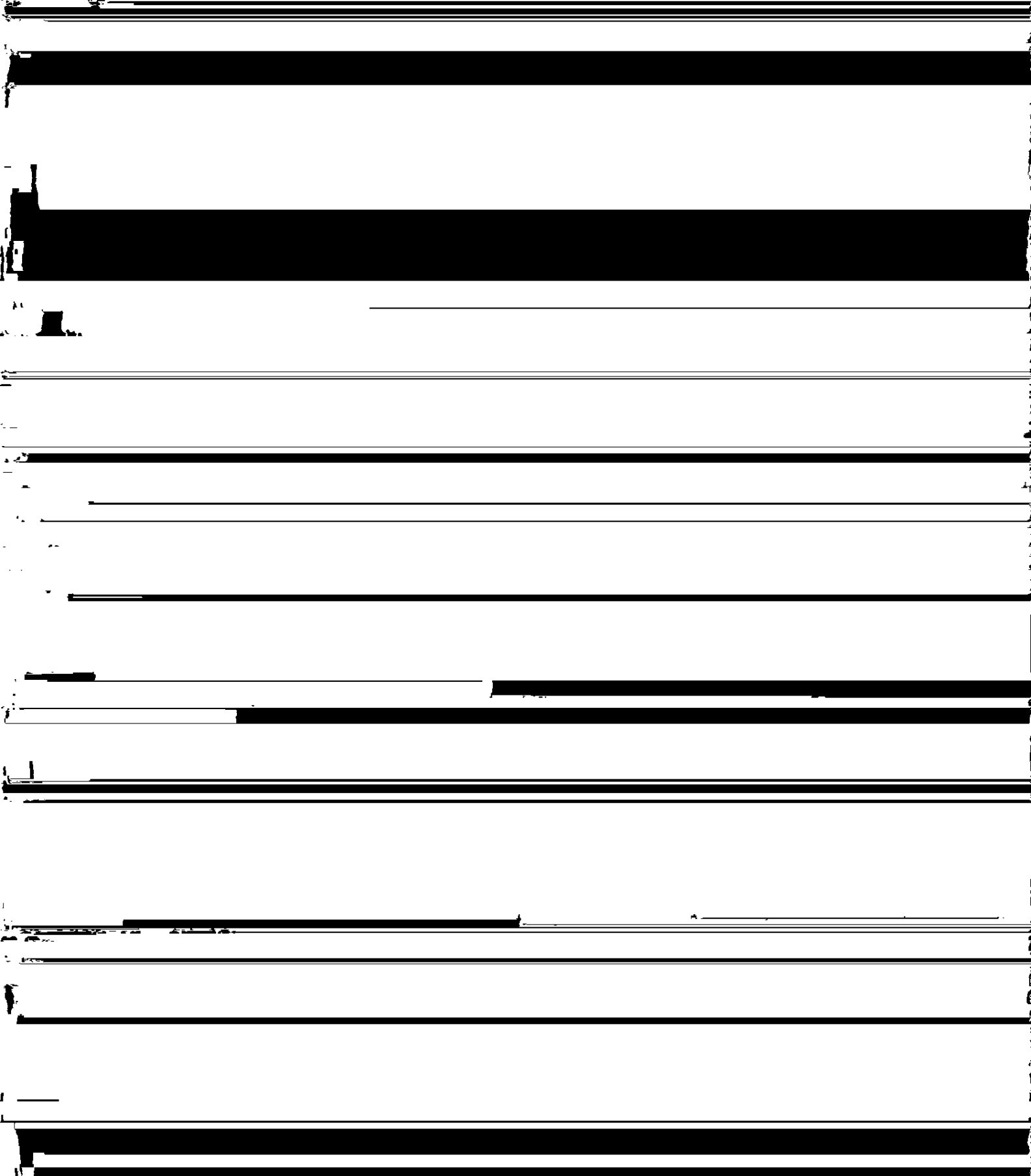
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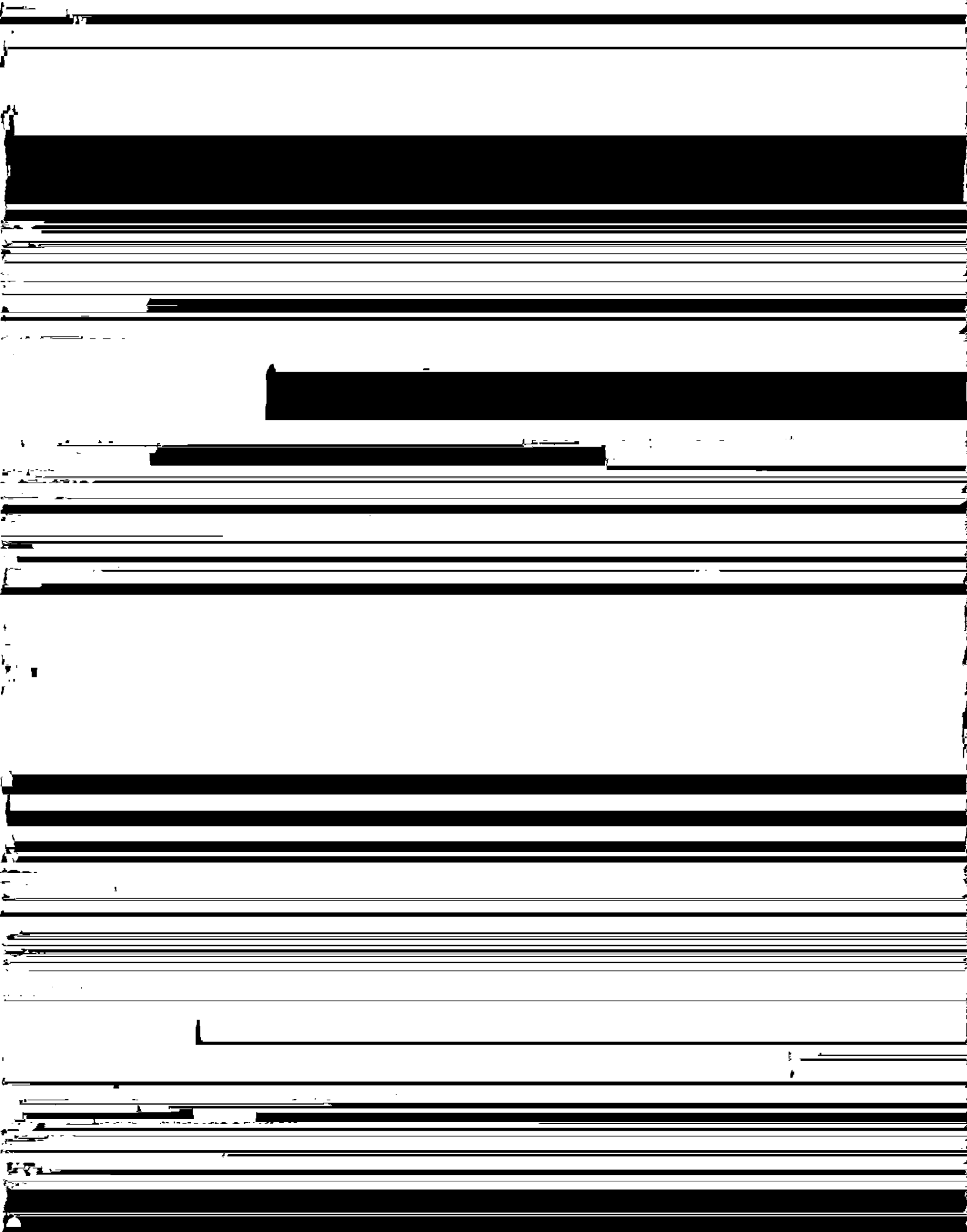
1 any good or service, are hereby permanently restrained and
2 enjoined from:

3 A. Misrepresenting or assisting others in misrepresenting,

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1 affirmatively act in order to avoid charges or additional charges



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1 1. The total costs to purchase, receive, or use, and
2 the quantity of, any instructional program or other good or
3 service;

4 2. All material restrictions, limitations, or
5 conditions to purchase, receive, or use any instructional program
6 or other good or service;

7 3. All material terms and conditions of any refund or
8 cancellation policy, or, if there is no refund or
9 cancellation policy, a statement of that fact; and

10 4. If the offer includes a negative option feature,
11 all material terms and conditions of the negative option feature,
12 including, but not limited to, the fact that the customer's
13 account will be charged unless the customer takes an affirmative
14 action to avoid the charge(s), the date(s) the charge(s) will be
15 submitted for payment, and the specific steps the customer must
16 take to avoid the charge(s);

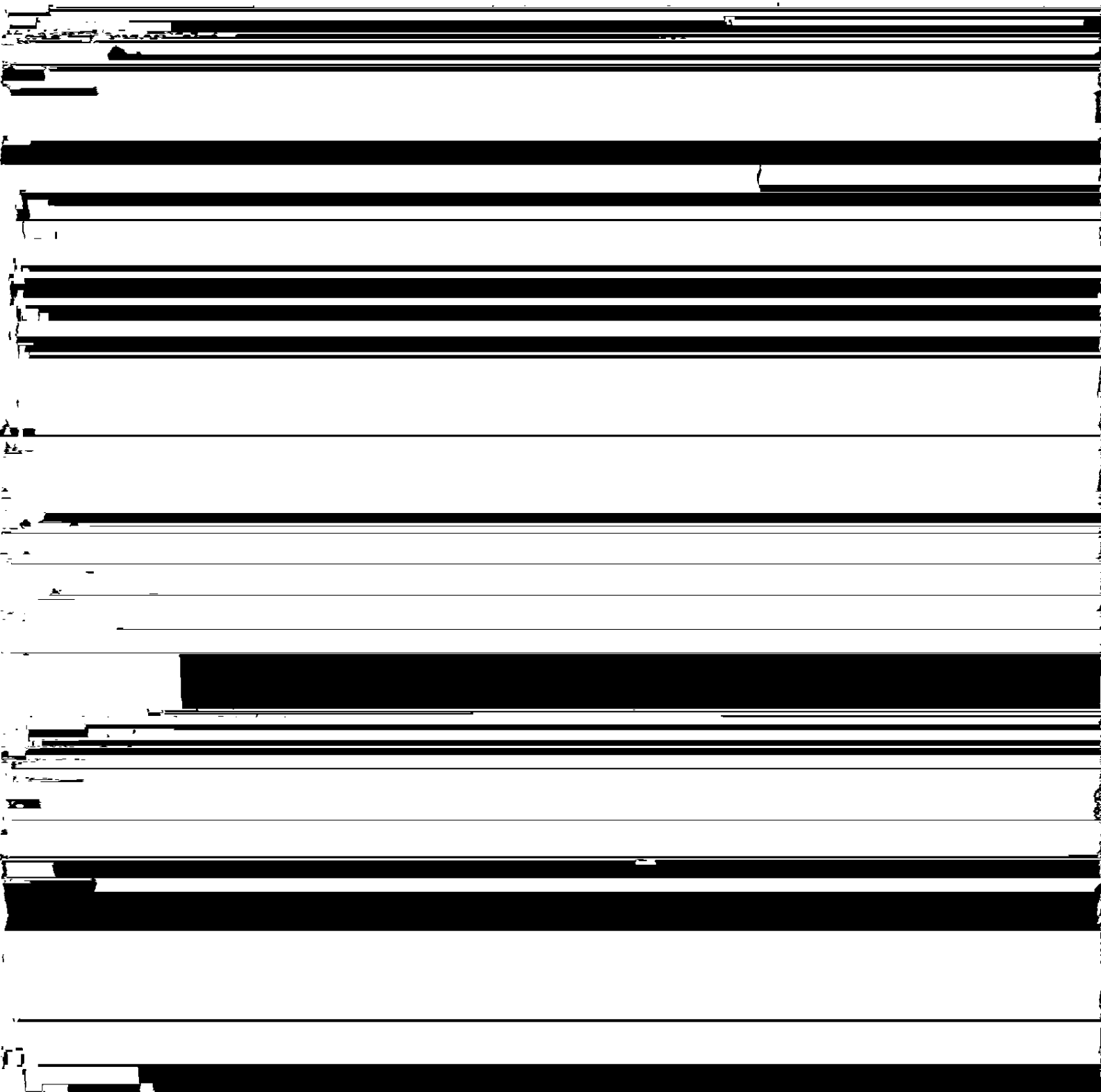
charge) only if Defendants have disclosed such terms and

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1 may be placed to that person, and shall include the telephone
2 number to which the calls may be placed and the signature of that
3 person; or

4 2. the seller has an established business

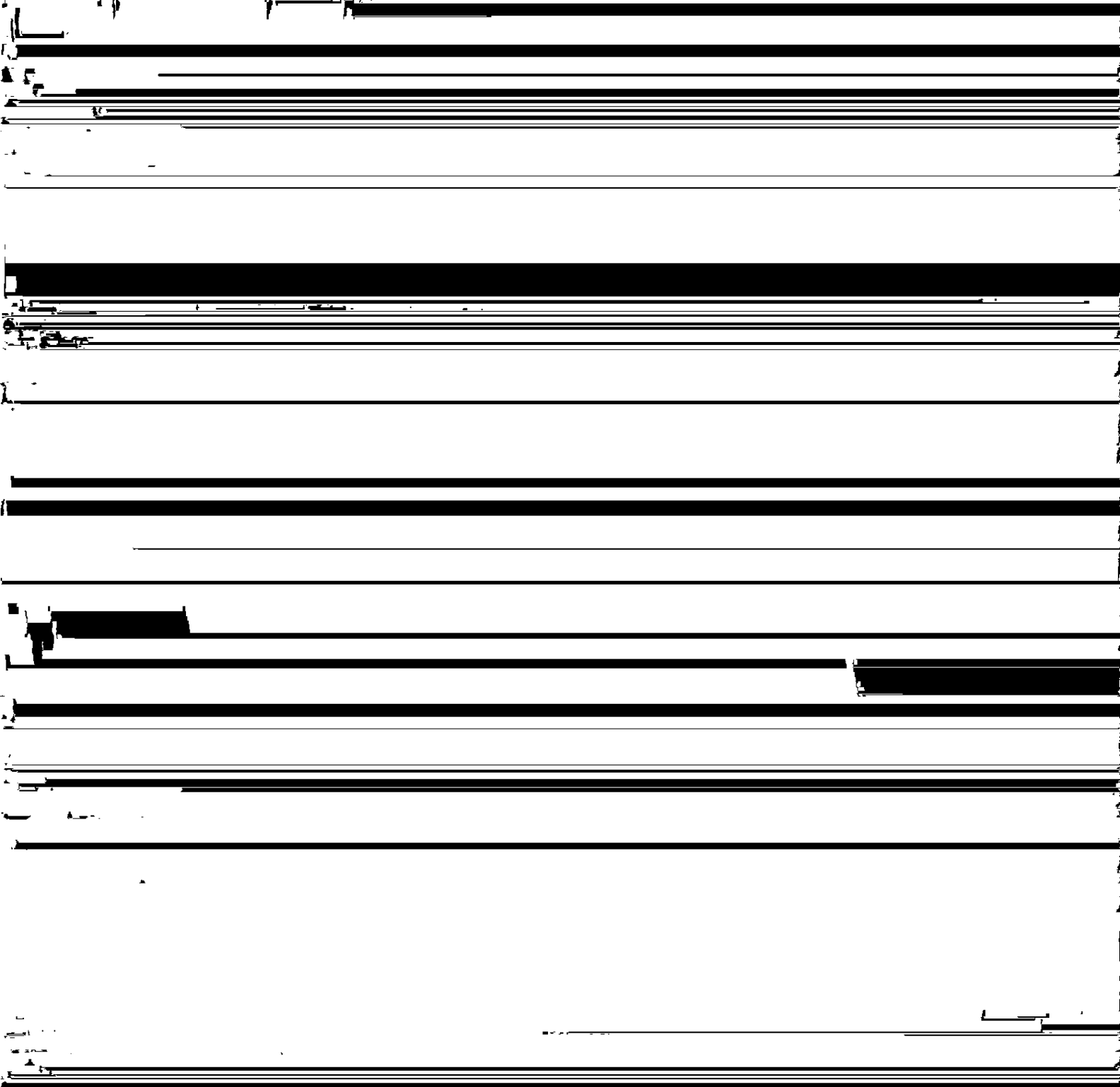
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1 3. Whenever a representative is not available to
2 speak with the person answering the call within two seconds after
3 the person's completed greeting, the seller or telemarketer
4 promptly plays a recorded message that states the name and
5 telephone number of the seller on whose behalf the call was
6 placed; and

7 4. Defendants retain records in accordance with 16



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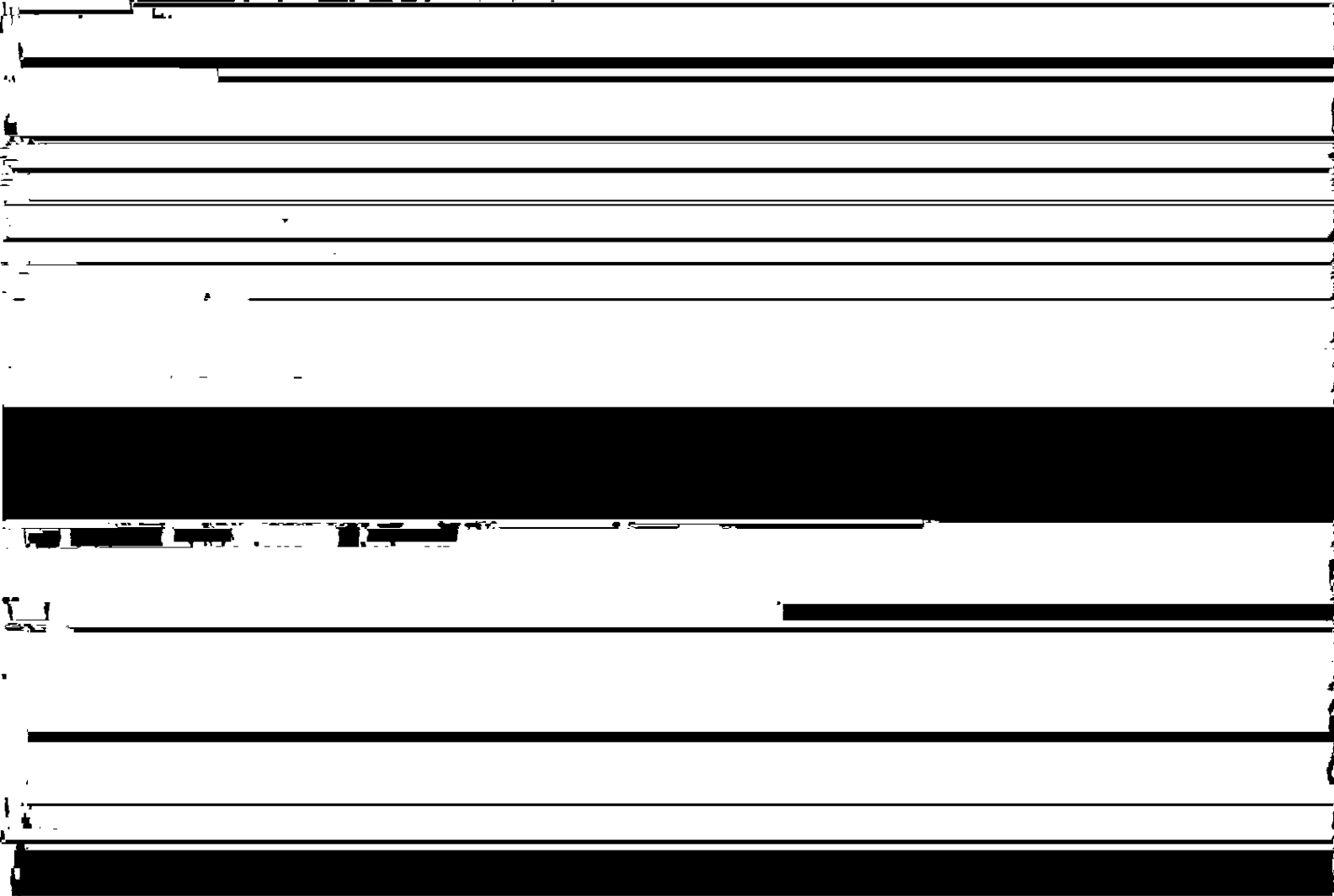
1 that enables any person to access another person's account, such
2 as a credit card, checking, savings, share or similar account,
3 utility bill, mortgage loan account, or debit card), e-mail
4 address, or other identifying information of any person who
5 submitted such information to any Defendant, at any time prior to
6 entry of this Order, in connection with the purchase of any
7 instructional program.

8 C. Provided, however, that Defendants may disclose such
9 identifying information (i) with the express written consent of
10 the person whose information is disclosed, (ii) to a law
11 enforcement agency, or (iii) as required or authorized by any
12 law, regulation, or court order.

13 **MONETARY RELIEF**

14 **V. IT IS FURTHER ORDERED** that:

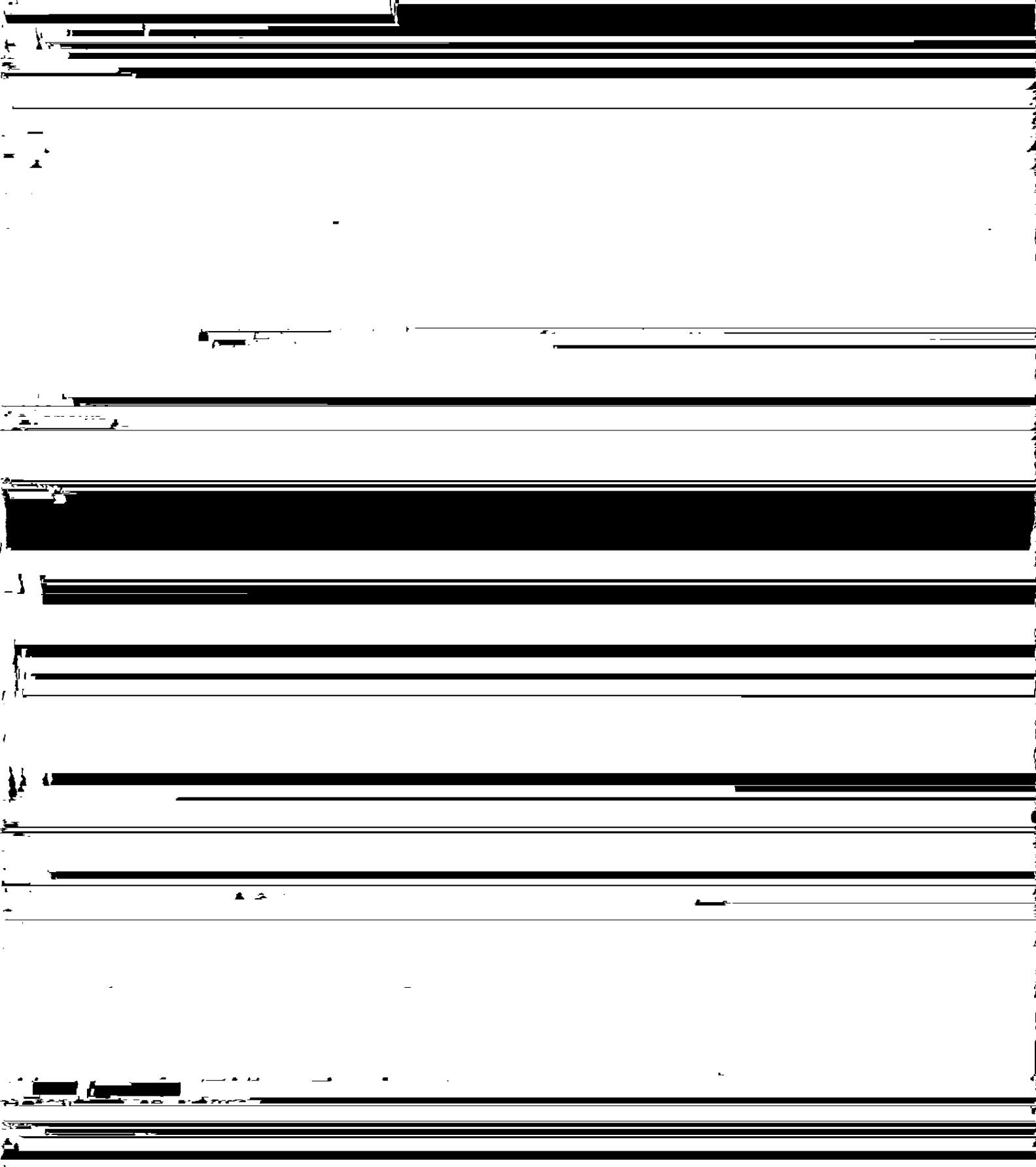
15 Judgment is hereby entered against Defendants jointly.



1 received by any Defendant for the payment or purchase of any
2 instructional program; and

3 c. Defendants shall (1) within twelve (12)
4 months of the date of entry of this Order transfer to the FTC or

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1 remaining funds for such other equitable relief (including
2 consumer information remedies) as it determines to be reasonably
3 related to Defendants' practices alleged in the Complaint. Any
4 funds not used for such equitable relief shall be deposited to
5 the U.S. Treasury as equitable disgorgement. Defendants shall

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VI. IT IS FURTHER ORDERED that, upon entry¹ of this Order and payment of the amount set forth in Section V.A.1.a. and b., the

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1 this Order to all principals, officers, directors, and managers,
2 and all employees, agents, and representatives who engage in
3 conduct related to the subject matter of the Order.

4 B. Defendants Jhonny Rojas and Wilson Rojas, in connection
5 with any business where (1) he controls, directly or indirectly,
6 the business or has a majority ownership interest, and (2) the

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RECORD-KEEPING PROVISIONS

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2 **IX. IT IS FURTHER ORDERED** that, for a period of eight (8) years
3 from the date of entry of this Order, each Defendant, in
4 connection with any business where (1) such Defendant is the
5 majority owner or otherwise controls, directly or indirectly, the
6 business and (2) the business is engaged in or assists others
7 engaged in telemarketing or the advertising, promoting,
8 marketing, offering for sale, sale, or distribution of any
9 instructional program, and their agents, employees, officers,
10 corporations, successors, and assigns, and those persons in
11 active concert or participation with them who receive actual
12 notice of this Order by personal service or otherwise, are hereby

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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D. Complaint and refund requests (whether received

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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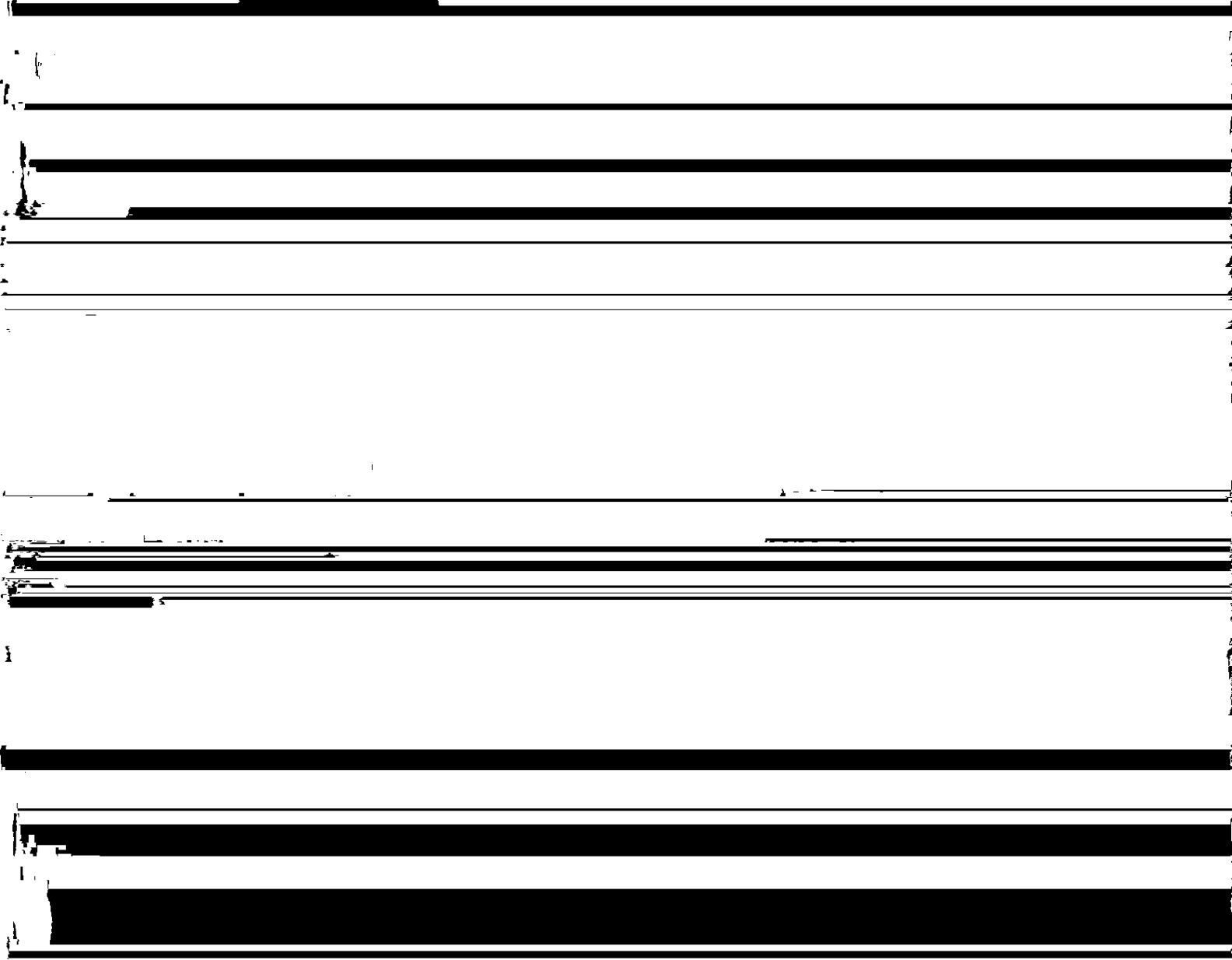
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1 of his duties and responsibilities in
2 connection with the business;
3 (c) Any changes in his name or use of any aliases
4 or fictitious names; and

5 2. Defendants FGH International Corp., FGH
6 International S.R.L., and Inti California, Inc. and their
7 successors and assigns each shall notify the FTC of the
8 following:

9 (a) Any changes in its mailing address,
10 registered address, principal place of
11 business, or any other address at which it
12 conducts business in whole or in part and



1 (20) days prior to the date such action is to take place

[REDACTED]

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1 additional written reports, sworn to under penalty of perjury;
2 produce documents for inspection and copying; appear for
3 deposition; and/or provide entry during normal business hours to
4 any business location in such Defendant's possession or direct or
5 indirect control to inspect the business operation;

6 B. In addition, the FTC is authorized to monitor
7 compliance with this Order by all other lawful means, including
8 but not limited to the following:

9 1. obtaining discovery from any person, without

10 ~~1. obtaining discovery from any person, without~~

EXHIBIT DOCUMENT OF DEPARTMENT OF JUSTICE

[REDACTED]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 4, 2005, a true and correct copy of STIPULATED FINAL ORDER FOR PERMANENT

FILED

overnight courier on Eliel Chemerinski, Esq., 1875 Century Park East, Suite 1000, Los Angeles, California 90067

FILED