

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

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CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CASE NO. 8:00-CV-2114-T-17TBM

PARA-LINK INTERNATIONAL, INC.,  
et al.

Defendants.

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

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~~[PROPOSED]~~ **STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT  
INJUNCTION AND OTHER EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), filed a Complaint for a permanent injunction and other equitable relief in this matter pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b). The FTC charged defendants Para-Link International, Inc., AAA Family Centers, Inc., Liberty Group of America, Inc., Deborah R. Dolen, Judy Graves, and Matthew See with engaging in deceptive acts or practices in connection with the marketing and sale of work-at-home paralegal opportunities, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45. The parties, by and through their respective attorneys, have agreed to settle this action without adjudication of any issue of fact or law, and without any admission of liability. Accordingly, it is hereby **ORDERED, ADJUDGED, AND DECREED:**

**FINDINGS**

1. This Court has jurisdiction of the subject matter of this case and the parties hereto. Venue is proper as to all parties in the Middle District of Florida.
2. The alleged activities of Defendants (as "Defendants" are defined below) are in or affecting commerce, as defined in the FTC Act. 15 U.S.C. § 44.
3. The Complaint states a claim upon which relief may be granted against Defendants under Sections 5(a) and 13(b) of the FTC Act. 15 U.S.C. §§ 45(a), 53(b).

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4. Defendants waive all rights to seek judicial review or otherwise challenge or contest the validity of this Order. Defendants further waive any claim that may arise under the Equal Access to Justice Act, 28 U.S.C. § 2412, and any claims they may have against the Commission, its employees, representatives, or agents.

5. Defendants enter into this Order freely and without coercion and acknowledge that they understand the provisions of this Order and are prepared to abide by them.

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

7. Entry of this Order is in the public interest.

8. Except as provided in Section VII below, this Order supersedes and replaces in its entirety the Preliminary Injunction dated April 30, 2001.

#### DEFINITIONS

For purposes of this Order:

1. "**Business Venture**" means any written or oral business arrangement, however denominated, whether or not covered by the Franchise Rule, 16 C.F.R. Part 436, which consists of the payment of any consideration for:

(a) the right or means to offer, sell or distribute goods or services (whether or not identified by a trademark, service mark, trade name, advertising, or other commercial symbol); and

(b) 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. "**Work-at-home opportunity**" means any program, plan, product, or service that purports to enable a participant or purchaser to earn money while working from home.

3. "**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 is a separate document within the meaning of the term.

4. "**Defendants**" means Para-Link International, Inc., AAA Family Centers, Inc., Liberty Group of America, Inc., Deborah R. Dolen, Judy Graves a/k/a Judith M. Graves, and Matthew See.

5. "**Individual Defendants**" means Deborah R. Dolen, Judy Graves a/k/a Judith M. Graves, and Matthew See.

6. "**Receivership Defendants**" means Para-Link International, Inc., AAA Family Centers, Inc., and Liberty Group of America, Inc..

7. "**Consumer**" means any person, including any individual, group, unincorporated association, limited or general partnership, corporation or other business entity.

8. The terms "**and**" and "**or**" have both conjunctive and disjunctive meanings.

## ORDER

### I.

#### PERMANENT BAN

**IT IS THEREFORE ORDERED** that Defendants, and their successors, assigns, agents, servants, employees, officers, and all persons or entities directly or indirectly under their control, 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, and each such person, whether acting directly or through any corporation, limited liability company, subsidiary, division, or other device, are hereby permanently restrained and enjoined from:

A. Advertising, marketing, promoting, offering for sale, or selling any business venture or work-at-home opportunity; 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, or consultant or advisor to, any business entity engaged in the advertising, marketing, promoting, offering for sale, or sale of any business venture or work-at-home opportunity.

## II.

### PROHIBITED REPRESENTATIONS

**IT IS FURTHER ORDERED** that in connection with the advertising, marketing, promoting, offering for sale, or sale of any good or service, Defendants, and their successors, assigns, agents, servants, employees, officers, and all persons or entities directly or indirectly under their control, 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, and each such person, whether acting directly or through any corporation, limited liability company, subsidiary, division, or other device, are hereby permanently restrained and enjoined from misrepresenting, expressly or by implication, any fact material to a consumer's decision to buy or accept the good or service.

## III.

### RECEIVERSHIP PROVISIONS

**IT IS FURTHER ORDERED** that:

A. The Receiver, Gwynne A. Young of Carlton, Fields, Post Office Box 3239, Tampa, Florida, 33601-3239, shall wind down the affairs and marshal the records and assets of the Receivership Defendants. Within 90 days after entry of this Order, the Receiver shall file a final report to this Court describing the wind-down of the business of the Receivership Defendants and the scope of the Receiver's activities. Upon the Court's approval of the final report, the receivership shall be terminated.

B. The Receiver and all personnel hired by the Receiver as authorized by the Court, including counsel to the Receiver, shall be entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the assets now held by or in the possession or control of, or which may be received by, the Receivership Defendants. Within 90 days after entry of this Order, the Receiver shall file with the Court, and serve on the parties, a final accounting and request for the payment of such reasonable compensation.

#### IV.

#### MONETARY RELIEF

**IT IS FURTHER ORDERED** that:

A. Judgment is entered against defendants Deborah R. Dolen and Judith M. Graves, jointly and severally, in the amount of Forty Thousand Dollars (\$40,000).

B. Dolen and Graves shall pay the sum of Forty Thousand Dollars (\$40,000) to the Commission by cashier's or certified check, within 45 days after the Court enters this Order, or 90 days of the date that they sign this Order, whichever is later.

C. In the event that Dolen and Graves default on their obligations under Sections IV.B above, the FTC shall be entitled to a judgment against Deborah R. Dolen and Judith M. Graves, jointly and severally, in the amount of One Million Six Hundred Fifty Thousand Dollars (\$1,650,000.00), which the parties stipulate is the amount of consumer injury caused by Defendants. The judgment, less any amounts paid to the Commission under Section IV.B, shall become immediately due and payable, together with interest computed at the rate prescribed under 28 U.S.C. § 1961, as amended.

D. All monies paid pursuant to this Section 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, and payment of any Court-approved fees and expenses of the Receiver. 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 remedies) as it determines to be reasonably related to 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 Section.

#### V.

#### RIGHT TO REOPEN

**IT IS FURTHER ORDERED** that:

A. The Commission's agreement to, and the Court's approval of, this Order is expressly premised upon the truthfulness, accuracy, and completeness of Deborah Dolen's financial statement dated February 6, 2002, Judith M. Graves' financial statement dated February 6, 2002, Matthew See's financial statement dated June 1, 2001, and related information submitted by defendants to the Commission, which contain material information relied upon by the Commission in negotiating and agreeing to the terms of this Order.

B. If, upon motion by the Commission, this Court should find that Deborah R. Dolen, Judith M. Graves, or Matthew See made a material misrepresentation or omitted material information concerning their respective financial condition, then the Court shall enter a modified judgment holding that any such defendant is liable to the Commission in the amount of One Million Six Hundred Fifty Thousand Dollars (\$1,650,000.00), which the parties stipulate is the amount of consumer injury caused by Defendants. The judgment, less any amounts paid to the Commission pursuant to Section IV above, shall become immediately due and payable by any such defendant, together with interest computed at the rate prescribed under 28 U.S.C. § 1961, as amended.

C. Defendants agree that the facts as alleged in the Complaint filed in this action shall be taken as true in any subsequent litigation filed by the Commission to enforce its rights pursuant to this Order, including, but not limited to, a nondischargeability complaint filed in any bankruptcy proceeding.

D. Any proceedings instituted under this Section are in addition to, and not in lieu of, any other civil or criminal remedies as may be provided by law, including any other proceedings that the FTC may initiate to enforce this Order.

## VI.

### LIFTING OF ASSET FREEZE

**IT IS FURTHER ORDERED** that the freeze against the assets of defendants Deborah R. Dolen and Judith M. Graves under Section II of the Preliminary Injunction entered by this Court on April 30, 2001, shall remain in full force and effect until the judgment set forth in Section IV of this Order is paid in full. Upon satisfaction of the judgment, the asset freeze shall be lifted.

VII.

**CUSTOMER LISTS**

**IT IS FURTHER ORDERED** that Defendants and their successors, assigns, agents, servants, employees, officers, and all persons or entities directly or indirectly under their control, 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, and each such person, whether acting directly or through any corporation, subsidiary, division, or other device, are 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 who paid money to any of the Defendants for purchase of a work-at-home opportunity; *provided* that Defendants may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

VIII.

**DISTRIBUTION OF ORDER BY INDIVIDUAL DEFENDANTS**

**IT IS FURTHER ORDERED** that, for a period of five (5) years from the date of entry of this Order, Individual Defendants Deborah R. Dolen, Judith M. Graves, and Matthew See shall each:

A. Provide a copy of this Order to, and obtain a signed and dated acknowledgment of receipt of same from, each officer or director, each individual serving in a management capacity, all personnel involved in responding to consumer complaints or inquiries, and all sales personnel, whether designated as employees, consultants, independent contractors, or otherwise, immediately upon employing or retaining any such persons, for any business where such defendant is the majority owner of the business or directly or indirectly manages or controls the business; and

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

IX.

**RECORD KEEPING PROVISIONS**

**IT IS FURTHER ORDERED** that, for a period of eight (8) years from the date of entry of this Order, Individual 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, in connection with any business where an Individual Defendant is the majority owner of the business or directly or indirectly manages or controls the business, are hereby restrained and enjoined from failing to create, and from failing to 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 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. Complaint and refund requests (whether received directly, indirectly or through any third party) and any responses to those complaints or requests; and

E. Copies of all sales scripts, training materials, advertisements, or other marketing materials.

X.

**COMPLIANCE REPORTING BY INDIVIDUAL DEFENDANTS**

**IT IS FURTHER ORDERED** that, in order that compliance with the provisions of this Order may be monitored, Individual Defendants shall each:

A. For a period of five (5) years from the date of entry of this Order, notify the Commission of the following:

1. Any changes in their residence address, mailing address, and telephone number, within ten (10) days of the date of such change;

2. Any changes in their employment status (including self-employment) within ten (10) days of such change. The notice shall include the name and address of each business with which such defendant is affiliated or employed, a statement of the nature of the business, and a statement of his or her duties and responsibilities in connection with the business or employment; and

3. Any proposed change in the structure of any business entity owned or controlled by such defendant, such as creation, incorporation, dissolution, assignment, sale, merger, creation or dissolution of subsidiaries, proposed filing of a bankruptcy petition, or change in the corporate name or address, or any other change that may affect compliance obligations arising out of this Order, thirty (30) days prior to the effective date of any proposed change; *provided, however,* with respect to any such proposed change about which an Individual Defendant learns less than thirty (30) days prior to the date such action is to take place, such defendant shall notify the Commission as soon as practicable after learning of the proposed change;

B. One hundred eighty (180) days after the date of entry of this Order, Individual Defendants shall each 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. Such defendant's then current residence and mailing addresses and telephone number;

2. Such defendant's then current employment, business address, and telephone number, a description of the business activities of each such employer, and defendant's title and responsibilities for each employer;

3. A copy of each acknowledgment of receipt of this Order obtained by such defendant pursuant to this Order; and

4. A statement describing the manner in which such defendant has complied and is complying with the injunctive provisions in Sections I and II of this Order.

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

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

Associate Director  
Division of Marketing Practices  
Federal Trade Commission, Room 238  
6<sup>th</sup> Street and Pennsylvania Avenue, NW  
Washington, D.C. 20580

Re: FTC v. Para-Link, Inc. et al  
00-CV-2114 (M.D. Fla.)

E. For the purposes of this Section, "employment" includes the performance of services as an employee, consultant, or independent contractor; and "employers" includes any individual or entity for whom defendant performs services as an employee, consultant, or independent contractor.

F. For purposes of the compliance reporting required by this Section, the Commission is authorized to communicate directly with any of the Individual Defendants.

## XI.

### COMMISSION'S AUTHORITY TO MONITOR COMPLIANCE

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

A. The Commission is authorized, without further leave of court, to obtain discovery from any person in the manner provided by Chapter V of the Federal Rules of Civil Procedure, Fed. R. Civ. P. 26-37, including the use of compulsory process pursuant to Fed. R. Civ. P. 45, for the purpose of monitoring and investigating their compliance with any provision of this Order;

B. The Commission is authorized to use representatives posing as consumers and suppliers to Individual Defendants, their employees, or any other entity managed or controlled in whole or in part by them, without the necessity of identification or prior notice;

C. 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 and 57b-1, to investigate whether Individual Defendants have violated any provision of this Order or Section 5 of the FTC Act, 15 U.S.C. § 45; and

D. For purposes of the compliance monitoring authorized by this Section, the Commission, and its agents, are authorized to communicate directly with any of the Individual Defendants.

## XII.

### ACCESS TO BUSINESS PREMISES

**IT IS FURTHER ORDERED** that, for a period of five (5) years from the date of entry of this Order, for the purpose of further determining compliance with this Order, Individual Defendants shall, within three (3) business days of receipt of written notice from the Commission, permit representatives of the Commission:

A. Access during normal business hours to any office, or facility storing documents, of any business where any such defendant is the majority owner of the business or directly or indirectly manage or control the business. In providing such access, Individual Defendants shall permit representatives of the Commission to inspect and copy all documents relevant to any matter contained in this Order, and shall permit Commission representatives to remove documents relevant to any matter contained in this Order for a period not to exceed five (5) business days so that the documents may be inspected, inventoried, and copied;

B. To interview the officers, directors, and employees, including all personnel involved in responding to consumer complaints or inquiries, and all sales personnel, whether designated as employees, consultants, independent contractors, or otherwise, of any business to which Paragraph A of this Section applies, concerning matters relating to compliance with the terms of this Order. The person interviewed may have counsel present;

C. For purposes of the access request permitted by this Section, the Commission is authorized to communicate directly with any of the Individual Defendants.

D. *Provided that*, upon application of the Commission and for good cause shown, the Court may enter an *ex parte* order granting immediate access to the premises of any business to which Paragraph A of this Section applies, for the purposes of inspecting and copying all documents relevant to any matter contained in this Order.

### **XIII.**

#### **ACKNOWLEDGMENT OF RECEIPT OF ORDER BY INDIVIDUAL DEFENDANTS**

**IT IS FURTHER ORDERED** that, within five (5) business days after receipt of this Order as entered by the Court, defendants Deborah R. Dolen, Judith M. Graves, and Matthew See shall each submit to the Commission a truthful sworn and notarized statement, in the form attached to this Order as Appendix A, acknowledging receipt of this Order as entered by this Court.

### **XIV.**

#### **COSTS AND ATTORNEYS FEES**

**IT IS FURTHER ORDERED** that each party to this Order bear its own costs and attorneys fees incurred in connection with this action.

### **XV.**

#### **CONTINUED JURISDICTION**

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

XVI.

INDEPENDENCE OF OBLIGATIONS

IT IS FURTHER ORDERED that the expiration of any requirements imposed by this Order shall not affect any other obligation under this Order.

SO STIPULATED:

Michael P. Mora  
Counsel for Plaintiff Federal Trade Commission

Dated: \_\_\_\_\_, 2002

Edmund S. Whitson, III  
Carlton Fields, P.A.  
Counsel for Receiver Gwynne A. Young

Dated: \_\_\_\_\_, 2002

Defendant Judith M. Graves

Dated: 2/6, 2002

John D. Goldsmith  
Trenam Kemker  
Counsel for defendants Deborah R. Dolen  
and Judith M. Graves

Dated: 2/6, 2002

Defendant Deborah R. Dolen

Dated: 2/6, 2002

Defendant Matthew See

Dated: \_\_\_\_\_, 2002

IT IS SO ORDERED.

Dated: MAY 23rd 2002

Elizabeth A. Kovachevick  
CHIEF UNITED STATES DISTRICT JUDGE

CLERK OF DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

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XVI.

INDEPENDENCE OF OBLIGATIONS

IT IS FURTHER ORDERED that the expiration of any requirements imposed by this Order shall not affect any other obligation under this Order.

SO STIPULATED:

\_\_\_\_\_  
Michael P. Mora  
Counsel for Plaintiff Federal Trade Commission

Dated: \_\_\_\_\_, 2002



Edmund S. Whitson, III  
Carlton Fields, P.A.  
Counsel for Receiver Gwynne A. Young

Dated: February 11, 2002

\_\_\_\_\_  
Defendant Judith M. Graves

Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
John D. Goldsmith  
Trenam Kemker  
Counsel for defendants Deborah R. Dolen  
and Judith M. Graves

Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
Defendant Deborah R. Dolen

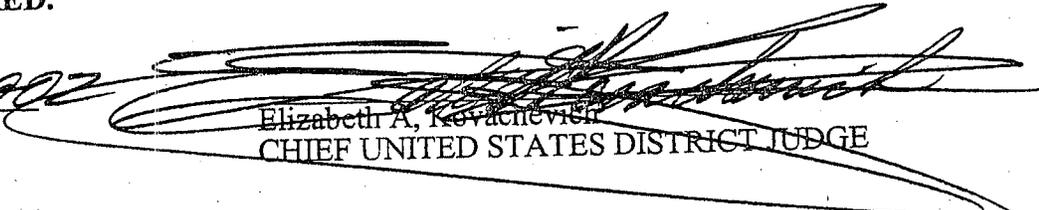
Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
Defendant Matthew See

Dated: \_\_\_\_\_, 2002

IT IS SO ORDERED.

Dated: MAY 23, 2002

  
Elizabeth A. Kovachevich  
CHIEF UNITED STATES DISTRICT JUDGE

XVI.

INDEPENDENCE OF OBLIGATIONS

IT IS FURTHER ORDERED that the expiration of any requirements imposed by this Order shall not affect any other obligation under this Order.

SO STIPULATED:

\_\_\_\_\_  
Michael P. Mora  
Counsel for Plaintiff Federal Trade Commission

Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
John D. Goldsmith  
Trenam Kemker  
Counsel for defendants Deborah R. Dolen  
and Judith M. Graves

Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
Edmund S. Whitson, III  
Carlton Fields, P.A.  
Counsel for Receiver Gwynne A. Young

Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
Defendant Deborah R. Dolen

Dated: \_\_\_\_\_, 2002

\_\_\_\_\_  
Defendant Judith M. Graves

Dated: \_\_\_\_\_, 2002

*Matthew A. See*  
\_\_\_\_\_  
Defendant Matthew See

Dated: 2/15/ \_\_\_\_\_, 2002

IT IS SO ORDERED.

Dated: MAY 23 2007

*Elizabeth A. Kovachévich*  
\_\_\_\_\_  
Elizabeth A. Kovachévich  
CHIEF UNITED STATES DISTRICT JUDGE

XVI.

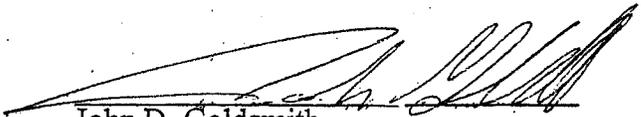
INDEPENDENCE OF OBLIGATIONS

IT IS FURTHER ORDERED that the expiration of any requirements imposed by this Order shall not affect any other obligation under this Order.

SO STIPULATED:

Michael P. Mora  
Counsel for Plaintiff Federal Trade Commission

Dated: \_\_\_\_\_, 2002



John D. Goldsmith  
Trenam Kemker  
Counsel for defendants Deborah R. Dolen,  
Judith M. Graves, Para-Link International,  
Inc., AAA Family Centers, Inc., and The  
Liberty Group of America, Inc.

Dated: April 3, 2002

Edmund S. Whitson, III  
Carlton Fields, P.A.  
Counsel for Receiver Gwynne A. Young

Dated: \_\_\_\_\_, 2002

Defendant Deborah R. Dolen

Dated: \_\_\_\_\_, 2002

Defendant Judith M. Graves

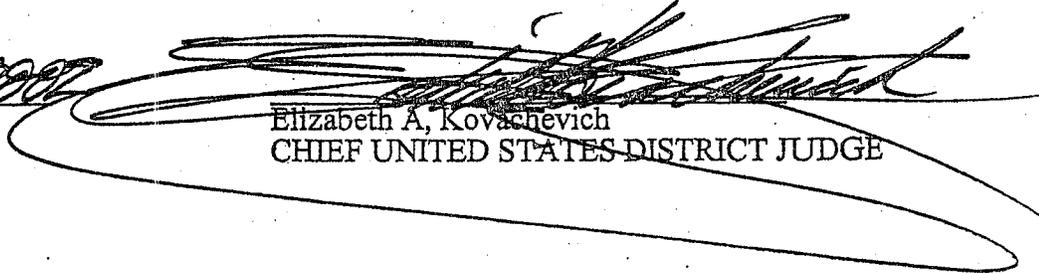
Dated: \_\_\_\_\_, 2002

Defendant Matthew See

Dated: \_\_\_\_\_, 2002

IT IS SO ORDERED.

Dated: MAY 23, 2002



Elizabeth A. Kovachevich  
CHIEF UNITED STATES DISTRICT JUDGE

XVI.

INDEPENDENCE OF OBLIGATIONS

IT IS FURTHER ORDERED that the expiration of any requirements imposed by this Order shall not affect any other obligation under this Order.

SO STIPULATED:

Michael P. Mora  
Michael P. Mora  
Counsel for Plaintiff Federal Trade Commission

Dated: May 3, 2002

John D. Goldsmith  
John D. Goldsmith  
Trenam Kemker  
Counsel for defendants Deborah R. Dolen,  
Judith M. Graves, Para-Link International,  
Inc., AAA Family Centers, Inc., and The  
Liberty Group of America, Inc.

Dated: \_\_\_\_\_, 2002

Edmund S. Whitson, III  
Edmund S. Whitson, III  
Carlton Fields, P.A.  
Counsel for Receiver Gwynne A. Young

Dated: \_\_\_\_\_, 2002

Defendant Deborah R. Dolen  
Defendant Deborah R. Dolen  
Dated: \_\_\_\_\_, 2002

Defendant Judith M. Graves  
Defendant Judith M. Graves  
Dated: \_\_\_\_\_, 2002

Defendant Matthew See  
Defendant Matthew See  
Dated: \_\_\_\_\_, 2002

IT IS SO ORDERED.

Dated: May 23, 2002  
Elizabeth A. Kovachevich  
Elizabeth A. Kovachevich  
CHIEF UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CASE NO. 8:00-CV-2114-T-17TBM

PARA-LINK INTERNATIONAL, INC.,  
et al.

Defendants.

**AFFIDAVIT OF RECEIPT OF STIPULATED FINAL JUDGMENT AND ORDER FOR  
PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

I, \_\_\_\_\_, hereby declare as follows:

1. I am a defendant in the action FTC v. Para-Link International, Inc. et al. My current residence address is \_\_\_\_\_.

I am a citizen of the United States and over the age of eighteen. I have personal knowledge of the facts set forth in this Affidavit.

2. I agreed to entry of a Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief ("Stipulated Order") to settle the charges in the Commission's Complaint. I read the provisions of the Stipulated Order before signing it. I understand all the provisions of the Stipulated Order. By signing the Stipulated Order I agreed to be bound by those provisions.

3. On \_\_\_\_\_, 20\_\_\_, I received a copy of the Stipulated Order which was signed by the Honorable Elizabeth A. Kovachevich and entered by the Court on \_\_\_\_\_, 20\_\_\_. A true and correct copy of the Stipulated Order that I received is appended to this Affidavit. The Stipulated Order was \_\_\_\_\_ pages in length. I reviewed the document and confirmed it was the document I had previously signed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_, Florida.

\_\_\_\_\_

State of \_\_\_\_\_, City of \_\_\_\_\_

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public  
My Commission Expires: