

REASONS FOR SETTLEMENT

This statement accompanies the final order executed by defendants Central Florida Investments, Inc., Westgate Resorts, Ltd., and CFI Sales & Marketing, L.L.C. The final order enjoins defendants from violating the Telemarketing Sales Rule (“Rule”), 16 C.F.R. Part 310, including the National Do Not Call Registry provisions. It also enters a civil penalty judgment against the defendants in the amount of \$900,000.

Pursuant to Section 5(m)(3) of the Federal Trade Commission Act, as amended, 15 U.S.C. § 45(m)(3), the Commission hereby sets forth its reasons for settlement by entry of a Stipulated Judgment and Order for Permanent Injunction (“final order”):

On the basis of the allegations contained in the complaint, the Commission believes that a civil penalty of \$900,000 constitutes the appropriate amount on which to base the settlement. The provisions enjoining defendants from failing to comply with the Rule should assure their future compliance with the law. With the entry of the final order, the time and expense of litigation will be avoided.

For the foregoing reasons, the Commission believes that the settlement by the entry of the attached final order is justified and well within the public interest.