

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 07-61152-CIV-HUCK/O'SULLIVAN

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FEDERAL TRADE COMMISSION,)
)
Plaintiff,)
)
v.)
)
INTEGRITY MARKETING TEAM, INC.,)
a Florida Corporation doing)
business as Home Business System;)
)
BYRON PETERSON, an individual doing)
business as Home Business System;)
and)
)
MIN SUNG KIM, an individual doing business)
as Home Business System, and as an)
officer of Integrity Marketing Team, Inc.;)
)
Defendants.)
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**STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT
INJUNCTION AND OTHER EQUITABLE RELIEF AGAINST DEFENDANT BYRON
PETERSON**

This matter comes before the Court on stipulation of Plaintiff, Federal Trade Commission ("FTC or Commission"), and Defendant Byron Peterson ("Defendant Peterson"). On August 14, 2007, the 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 Defendant Peterson with engaging in deceptive acts or practices in connection with the marketing and sale of work-at-home envelope stuffing opportunities, in violation of Section 5 of the FTC Act, 15 U.S.C. §45. On August 15, 2007, the Court entered a

Temporary Restraining Order and asset freeze against Defendant Peterson. On October 10, 2007, the Court entered a Stipulated Preliminary Injunction against Defendant Peterson.

The Commission and Defendant Peterson hereby stipulate to the entry of, and request the Court to enter, this Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief Against Defendant Byron Peterson ("Final Order" or "Order").

It is therefore ORDERED, ADJUDGED, AND DECREED:

FINDINGS

1. The Court has jurisdiction of the subject matter of this case and the parties hereto.
2. Venue in the United States District Court for the Southern District of Florida is proper under 28 U.S.C. § 1391(b) and (c) and 15 U.S.C. § 53(b).
3. The activities of Defendant Peterson are in or affecting commerce, as defined in the FTC Act, 15 U.S.C. §44.
4. The Complaint states a claim upon which relief may be granted against Defendant Peterson.
5. Defendant Peterson waives all rights to seek judicial review or otherwise challenge or contest the validity of this Order. Defendant Peterson further waives any claim under the Equal Access to Justice Act, 28 U.S.C. §2412, *amended by* Pub. L. 104-121, 110 Stat. 847, 863-64 (1996).
6. Defendant Peterson waives and releases any claim he may have against the Commission and its employees, representatives or agents.
7. Defendant Peterson enters into this Order freely and without coercion and acknowledge that he has read, understands, and is prepared to abide by the

provisions of this Order.

8. This Order is in addition to, and not in lieu of, any other civil or criminal remedies that may be provided by law.
9. Entry of this Order is in the public interest.

DEFINITIONS

1. **“Assisting Others”** means knowingly providing any of the following goods or services to another business venture: (A) performing customer service functions, including, but not limited to, receiving or responding to consumer complaints; (B) formulating or providing, or arranging for the formulation or provision of, any marketing material; (C) providing names of, or assisting in the generation of, potential customers; (D) hiring, recruiting or training personnel; (E) advising or acting as a consultant to others on the commencement or management of a business venture; or (F) performing marketing services of any kind.

2. **“Business Venture”** means any written or oral business arrangement, however denominated, that is covered by the Franchise Rule or the Business Opportunity Rule, or that consists of the payment of any consideration in exchange for:

- A. the right or means to offer, sell, or distribute goods or services (regardless of whether identified by a trademark, service mark, trade name, 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.

3. **“Defendant”** means Defendant Byron Peterson.