

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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<b>FEDERAL TRADE COMMISSION,</b>		)	
		)	
	<b>Plaintiff,</b>	)	<b>Case No. 4:96CV2225 SNL</b>
	<b>v.</b>	)	<b>(4:07CV1148)</b>
		)	
<b>ASSET PROTECTION GROUP, INC.,</b>		)	<b>Judge Limbaugh</b>
<b>and WILLIAM S. REED,</b>		)	
		)	
	<b>Defendants.</b>	)	
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**STIPULATED ORDER FOR PERMANENT INJUNCTION AND OTHER EQUITABLE  
RELIEF AGAINST WILLIAM S. REED AND ASSET PROTECTION GROUP, INC.**

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), has filed a Complaint seeking permanent injunctive relief, disgorgement, and other equitable relief pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), charging defendants with deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

Having fully considered the record and the applicable law, the Court now issues this Order for Permanent Injunction and Other Equitable Relief.

**FINDINGS**

1. This Court has jurisdiction over the subject matter of this case and the parties hereto pursuant to 15 U.S.C. §§ 45(a) and 53(b), and 28 U.S.C. §§ 1331, 1337(a), and 1345.
2. Venue in this district is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b)-(c).

3. The activities of the defendants are in or affecting “commerce,” as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

4. This Court has held the defendants in civil contempt after finding by clear and convincing evidence that they violated a Permanent Injunction by engaging in material misrepresentations and by failing to disclose material facts to consumers in connection with the advertising, promotion, marketing, offering for sale, or sale of a training and business opportunity program. *FTC v. Neiswonger et al.*, 4:96CV2225 SNL (Apr. 23, 2007).

5. The Commission and Defendants stipulate and agree to this Permanent Injunction without the defendants admitting liability for any of the violations of the FTC Act alleged in the Complaint in this action. Defendants acknowledge that they have read the provisions of this Order and agree to abide by them. Defendants consent freely and without coercion to entry of this Permanent Injunction. Defendant Reed does not object to the Receiver signing this Order on behalf of defendant Asset Protection Group, Inc.

6. This action and the relief ordered herein are in addition to, and not in lieu of, the relief ordered in the civil contempt action brought by the Commission against the defendants in *FTC v. Neiswonger, et al.*, No. 4:96CV2225 (E.D. Mo.).

7. This action and the relief ordered herein are in addition to, and not in lieu of, other civil or criminal remedies as may be provided by law, including any other proceedings the Commission may initiate to enforce this Order.

8. The parties agree that this Stipulation shall be submitted to the Court once fully executed, and shall be binding upon approval by this Court.

9. Defendants waive all rights to seek judicial review of, or otherwise challenge or

contest the validity of, this Order. Defendants waive and release any claim they may have against the FTC and their employees, representatives, or agents.

10. Entry of this Order is in the public interest. There being no just reason for delay, the Clerk is directed to enter this Order immediately.

### DEFINITIONS

For the purposes of this Permanent Injunction, the following definitions apply:

A. "Asset protection services" means any products, services, or techniques promoted or used to conceal or protect any assets from potential or actual litigants or creditors, law enforcement and government organizations, courts, or other third parties.

B. "Business Venture" means any written or oral business arrangement, however denominated, regardless of whether covered by the Franchise Rule or Business Opportunity Rule, which consists of the payment of any consideration for:

1. 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
2. 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.

C. "Defendants" means Asset Protection Group, Inc. ("APGI") and William S. Reed ("Reed"), and each of them, individually and jointly.

D. "Document" is equal in scope and synonymous in meaning to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, charts, graphs,

