

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION**

**Case No. 9:06-CV-1899-PMD**

<b>FEDERAL TRADE COMMISSION,</b>	)
	)
<b>Plaintiff,</b>	)
	)
<b>v.</b>	)
	)
<b>CORNERSTONE MARKETING LLC,</b>	)
<b>a South Carolina limited liability company,</b>	)
	)
<b>SIDNEY PUTNAM,</b>	)
<b>individually and d/b/a Prime Time Marketing,</b>	)
<b>Prestige Marketing, Metropolitan Placement</b>	)
<b>Services, and Best Locations,</b>	)
	)
<b>CAROL PUTNAM,</b>	)
<b>individually and d/b/a Prestige Marketing and</b>	)
<b>Best Locations,</b>	)
	)
<b>CHRISTOPHER PUTNAM,</b>	)
<b>individually and as a member, organizer, or</b>	)
<b>manager of Cornerstone Marketing LLC, and</b>	)
	)
<b>MELANIE PUTNAM,</b>	)
<b>individually and d/b/a Prestige Marketing and</b>	)
<b>Best Locations,</b>	)
	)
<b>Defendants.</b>	)
	)

**STIPULATED PERMANENT INJUNCTION AND FINAL ORDER**

This matter comes before the Court on Complaint of Plaintiff, Federal Trade Commission (“FTC” or “Commission”), against Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam. On June 28, 2006, the Commission

filed a Complaint for a permanent injunction and other equitable relief in this matter pursuant to Sections 5(a) and 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a) and 53(b). The FTC charged Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam with engaging in deceptive acts or practices in connection with the marketing and sale of location services to purchasers of business ventures, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45. The Commission and Defendants have agreed to settle all matters of dispute between them without adjudication. 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 pursuant to 28 U.S.C. §§ 1331, 1337(a), 1345, and 1355, and 15 U.S.C. §§ 45(a) and 53(b).
2. Venue in the District of South Carolina is proper as to all parties.
3. The activities of Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam 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 Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).
5. This Final Order is for settlement purposes only and does not constitute and shall not be interpreted to constitute an admission by Defendants that they engaged in violations of any law or regulation, or that the facts alleged in the complaint, other than jurisdictional facts, are

true.

6. Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam waive all rights to seek judicial review or otherwise challenge or contest the validity of this Final Order.

7. Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam further waive any claim, including any claim for attorneys' fees, 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.

8. Defendants Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam enter into this Final Order freely and without coercion and acknowledge that they have read, understand, and are prepared to abide by the provisions of this Final Order.

9. This Final Order is in addition to, and not in lieu of, any other civil or criminal remedies that may be provided by law.

10. Entry of this Final Order is in the public interest.

### **DEFINITIONS**

For the purpose of this Final Order, the following definitions shall apply:

1. "Defendants" mean Cornerstone Marketing LLC, Sidney Putnam, Carol Putnam, Christopher Putnam, and Melanie Putnam.

2. "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

