

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

FEDERAL TRADE COMMISSION, )  
)  
Plaintiff, )  
)  
v. ) Civil No. 2:01-CV-320  
)  
ICON AMERICA, INC., a Florida )  
corporation, )  
)  
9066-3451 QUEBEC, INC., d/b/a ) STIPULATED FINAL JUDGMENT AND  
SIERRA ENTERPRISES, a ) ORDER FOR PERMANENT INJUNCTION  
Quebec corporation, )  
)  
METE SUATAC, individually and doing )  
business as ICON AMERICA, INC., )  
and )  
)  
JONATHAN PARKINSON, a/k/a )  
JONATHAN PARKS, individually and )  
doing business as ICON AMERICA, INC., )  
)  
Defendants. )

Plaintiff, the Federal Trade Commission ("Commission") filed an Amended Complaint for Permanent Injunction and other equitable relief, charging defendants Icon America, Inc. ("Icon"), 9066-3451 Quebec, Inc., d/b/a Sierra Enterprises ("Sierra"), Mete Suatac, and Jonathan Parkinson ("defendants") with violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the FTC's Trade Regulation Rule entitled "Telemarketing Sales Rule," 16 C.F.R. Part 310. On March 4, 2002, the Court entered a Stipulation and Order for Preliminary Injunction and Asset Freeze.

Plaintiff and defendants now enter into this Stipulated Final Judgment and Order for Permanent Injunction.

### **FINDINGS**

By stipulation of the parties, the Court makes the following findings:

1. This Court has jurisdiction of the subject matter of this case and of the parties consenting hereto;
2. Venue is proper as to all parties in the District of Vermont;
3. The activities of the defendants are in or affecting commerce, as defined in the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 44;
4. The Amended Complaint states a claim upon which relief may be granted against Defendants under Sections 5(a), 13(b), and 19 of the FTC Act, 15 U.S.C. §§ 45(a), 53(b), and 57b, and the Telemarketing Sales Rule ("TSR"), 16 C.F.R. Part 310;
5. The Commission and defendants stipulate and agree to entry of the Final Judgment and Order for Permanent Injunction Against Icon, Sierra, Mete Suatac, and Jonathan Parkinson freely and without trial or final adjudication of any issue of fact or law, to settle and resolve all matters in dispute between the parties. By entering this stipulation, defendants acknowledge that each understands the provisions of the Order and is prepared to abide by them;

6. This action and the relief ordered herein are in addition to, and not in lieu of, other remedies as may be provided by law, including both civil and criminal remedies.
7. The parties agree that this Order shall be construed as solely remedial in nature, and shall not be construed as the payment of any fine, penalty, punitive assessment, or forfeiture.
8. The defendants have waived all rights that may arise under the Equal Access to Justice Act, 28 U.S.C. § 2412, amended by Pub. L. 104-121, 110 Stat. 847, 863-64 (1996);
9. The defendants have also waived all rights to seek appellate review or otherwise challenge or contest the validity of this Order, and have further waived and released any claim they may have against the Commission, its employees, and agents;
10. The entry of this Order shall not be construed as an admission of liability by any of the defendants; and
11. Entry of this Order is in the public interest.

## **DEFINITIONS**

1. "Defendants" means Icon America, Inc. ("Icon"), 9066-3451 Quebec, Inc., d/b/a Sierra Enterprises ("Sierra"), Mete Suatac, individually and doing business as Icon, and as an officer and director of Icon and of Sierra; and Jonathan Parkinson, individually and doing business as Icon, as general manager of Icon, and as customer service manager of Sierra; and each of them and their officers, agents, servants, directors, employees, salespersons, independent contractors, subsidiaries, affiliates, divisions, sales entities, related entities, successors, assigns

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, whether acting directly or through any trust, corporation, subsidiary, division or other device.

2. “Plaintiff” means the Federal Trade Commission.

3. “Consumer” means a purchaser, customer, subscriber, or natural person.

4. “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, into reasonably usable form through detection devices. A draft or non-identical copy is a separate document within the meaning of the term.

5. “Telemarketing,” and “assisting” are defined in Section 310.2 of the TSR, 16 C.F.R. § 310.2.

6. “Credit Card Loss Protection” means the advertisement, promotion, offering for sale, or sale of any product or service represented to register credit or debit accounts, including credit card accounts, or protect, indemnify, or reimburse the holder of a credit or debit account against unauthorized use or charges.

**I.**

**PROHIBITED BUSINESS PRACTICES**

**IT IS THEREFORE ORDERED** that, in connection with the telemarketing, advertising, promotion, offering for sale or sale of credit card loss protection, or other goods or services, defendants are hereby permanently restrained and enjoined from:

A. Making or assisting others in making, expressly or by implication, orally or in writing, any misrepresentation of material fact, including, but not limited to the following:

1. That defendant(s) is affiliated with, or calling from, or on behalf of, a consumer's credit card company or issuer, financial institution, or any other third party;
2. That any consumer is liable for unauthorized charges on his or her credit card accounts in excess of the \$50 limit set forth in 15 U.S.C. § 1643 and 12 C.F.R. § 226.12(b);
3. That if consumers do not purchase defendants' services, consumers can be held fully liable for any unauthorized charges made to their credit card accounts;
4. That defendants will refund the purchase price if for any reason a consumer seeks a refund within a stated time period;
5. That consumers have given authorization for their credit card or bank accounts to be charged for defendants' services;

B. Misrepresenting any other fact material to a consumer's decision to purchase defendants' credit card loss protection service or any other goods or services that are the subject of the sales offer; and

C. Violating the TSR, 16 C.F. R., Part 310, as attached hereto as **Appendix A**, or as it may be subsequently amended.

## II.

**IT IS FURTHER ORDERED** that, in connection with the telemarketing, advertising, promotion, offering for sale or sale of credit card loss protection, or other goods or services, defendants are hereby permanently restrained and enjoined from debiting or charging, or assisting others in debiting or charging, consumers' bank or credit card accounts without their prior authorization.

## III.

### **PROHIBITION AGAINST DISTRIBUTION OF CUSTOMER LISTS**

**IT IS FURTHER ORDERED** that defendants are hereby 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 any money to any defendant, at any time, in connection with telemarketing or the advertising, promotion, offering for sale or sale of credit card loss protection or related programs, goods or services. *Provided, however,* that any defendant may disclose such identifying information to defendant's counsel as may be needed to defend a civil or criminal action,

a law enforcement agency or as required by any law, regulation or court order, and shall disclose such identifying information to the plaintiff pursuant to this order.

#### IV.

#### MONETARY JUDGMENT

##### **IT IS FURTHER ORDERED** that

A. Judgment in the amount of one million five hundred three thousand five hundred seventy dollars (\$1,503,570.00) in U.S. currency is hereby entered against defendants Icon, Sierra, Mete Suatac, and Jonathan Parkinson, jointly and severally. *Provided, however*, that all of this amount except for the amount held in escrow by defendants' counsel, currently estimated at twenty-five thousand dollars (\$25,000) in U.S. currency, shall be suspended until further order of the Court, and *provided further* that this judgment and its suspension shall be subject to the conditions set forth in Section V. below. Defendants Icon, Sierra, Mete Suatac, and Jonathan Parkinson shall make the required payment of all such amounts held in escrow by defendants' counsel by certified or cashier's check payable to the Commission no later than ten (10) business days after entry of this Order.

B. All funds paid pursuant to this Paragraph 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. 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 the 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 Paragraph.

C. Defendants expressly waive their rights to litigate the issue of disgorgement;

D. In accordance with 31 U.S.C. § 7701, defendants are each hereby required to furnish to the Commission their respective taxpayer identifying numbers (social security number, social insurance number, employer identification number, or Revenue Canada identification number), which shall be used for purposes of collecting and reporting on any delinquent amount arising out of defendants' relationship with the government; and

E. Defendants acknowledge and agree that all money paid pursuant to this Order is irrevocably paid to the Commission for purposes of settlement between plaintiff and defendants of the claims in this action.

## V.

### COMMISSION'S RIGHT TO REOPEN

**IT IS FURTHER ORDERED** that the Commission's agreement to this Order is expressly premised upon the truthfulness, accuracy and completeness of defendants' financial condition as represented in sworn financial statements submitted to the Commission on January 3, 2002. Each defendant's sworn financial statement contains material information upon which the Commission has relied in negotiating and agreeing to the terms of this Order. If, upon motion by

the Commission, the Court finds that defendant Icon, Sierra, Mete Suatac, or Jonathan Parkinson failed to disclose any material asset with a value exceeding one thousand dollars (\$1,000) in U.S. Currency, or materially misrepresented the value of any asset, or made any other material misrepresentation in or omission from their financial statements, the Court shall enter judgment against defendants, in favor of the Commission, in the amount of one million five hundred three thousand five hundred seventy dollars (\$1,503,570.00) representing the approximate amount of consumer injury, and which will become immediately due and payable, less any payment already made. Defendants authorize the Commission to verify all information provided on defendants' corporate and individual financial statements with all appropriate third parties, including, but not limited to, financial institutions and credit reporting bureaus. For purposes of this Section and any subsequent proceedings to enforce payment, including but not limited to a non-dischargeability complaint filed in a bankruptcy proceeding, defendants waive any right to contest any of the allegations in the Commission's Amended Complaint.

## **VI.**

### **ASSET FREEZE**

**IT IS FURTHER ORDERED** that, upon entry of this Order and payment to the Commission of the amount due under Section IV hereof, the freeze of defendants' assets set forth in the Stipulation and Order for Preliminary Injunction shall be dissolved.

## VII.

### MONITORING COMPLIANCE OF SALES PERSONNEL

**IT IS FURTHER ORDERED** that defendants, in connection with any business where:(1) any defendant is the majority owner of the business or directly or indirectly controls the business and where (2) the business is engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection, or assisting others engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection, are hereby permanently restrained and enjoined from:

A. Failing to take reasonable steps sufficient to monitor and ensure that all employees and independent contractors engaged in sales or other customer service functions comply with Sections I , II, and III of this Order. Such steps shall include adequate monitoring of sales presentations or other calls with customers, and shall also include, at a minimum, the following:

1. Listening to oral representations made by persons engaged in sales or other customer service functions;
2. Establishing a procedure for receiving and responding to consumer complaints;
3. Ascertaining the number and nature of consumer complaints regarding transactions in which each employee or independent contractor is involved;

B. Failing promptly to fully investigate any consumer complaint received by any business to which this Section applies; and

C. Failing to take corrective action with respect to any sales person whom defendants determine is not complying with this Order, which may include training, disciplining, or terminating such sales person.

## VIII.

### RECORD KEEPING PROVISIONS

**IT IS FURTHER ORDERED** that, for a period of eight (8) years from the date of entry of this Order, defendants, in connection with any business where (1) any defendant is the majority owner of the business or directly or indirectly controls the business and where (2) the business is engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection, or assisting others engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection, are hereby permanently restrained and enjoined from failing to create and 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 accurately reflecting: the name, address, and telephone number of each person employed in any capacity by such business, including as an independent contractor;

the person's job 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, to the extent such information is obtained in the ordinary course of business;

D. Complaint and refund requests (whether received directly or 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.

## **IX.**

### **COMPLIANCE REPORTING BY DEFENDANTS**

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

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

1. Any changes in each defendant's residence mailing addresses, and telephone numbers within ten (10) days of such change;
2. Any changes in each defendant's employment status (including self-employment) in connection with telemarketing, or with the advertising,

promotion, offering for sale or sale of credit-related goods or services, within ten (10) days of such change. Such notice shall include the name and address of each business the defendant is affiliated with or employed by, a statement of the nature of the business, and a statement of such defendant's duties and responsibilities in connection with the business or employment; and

3. Any proposed change in the corporate structure of defendants Icon or Sierra, or any proposed change in the structure of any business entity owned or controlled by any defendant, such as creation, incorporation, dissolution, assignment, sale, merger, creation or dissolution of subsidiaries, 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;

B. One hundred eighty (180) days after the date of entry of this Order, each defendant shall provide a written report to the Commission, sworn to under penalty of perjury, setting forth in detail the manner and form in which each defendant has complied and is complying with this Order.

This report shall include but not be limited to:

1. Each defendant's then current residence address and telephone number;
2. Each defendant's then current employment, business addresses and telephone numbers, a description of the business activities of each such employers, and such defendant's title and responsibilities for each employer;

3. A copy of each acknowledgment of receipt of this Order obtained by defendants pursuant to Section XIII; and

4. A statement describing the manner in which each defendant has complied and is complying with (a) the injunctive provisions of this Order (Sections I, II, III), and (b) the consumer redress provisions of this Order (Section IV);

C. Upon written request by a representative of the Commission, each defendant 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, each defendant shall, unless otherwise directed by the Commission's authorized representatives, mail all written notifications to the Commission to:

Regional Director  
Federal Trade Commission  
One Bowling Green, Suite 318,  
New York, New York 10004

Re: *FTC v. Icon America, Inc.*

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

**X.**

**COMMISSION'S AUTHORITY TO MONITOR COMPLIANCE**

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

A. The Commission is authorized, without further leave of the 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 defendants' compliance with any provision of this Order;

B. The Commission is authorized to use representatives posing as consumers or suppliers to any defendant(s), any defendant's employees, or any other entity owned or controlled in whole or in part by any defendant, without the necessity of identification or prior notice; and

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, 57b-1, to investigate whether either defendant has violated any provision of this Order, the FTC Act, 15 U.S.C. § 45, or the TSR, 16 C.F.R. Part 310.

## **XI.**

### **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, defendants shall permit representatives of the Commission, within three (3) business days of receipt of written notice from the Commission:

A. Access during normal business hours to any office, or facility storing documents, of any business where (1) any defendant is the majority owner of the business or directly or indirectly controls the business, and where (2) the business is engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection, or assisting others engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection.

In providing such access, 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 subsection A of this Section applies, concerning matters relating to compliance with the terms of this Order. The person interviewed may have counsel present.

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

## **XII.**

### **DISTRIBUTION OF ORDER BY DEFENDANTS**

**IT IS FURTHER ORDERED** that, for a period of five (5) years from the date of entry of this Order, defendants shall:

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 (1) any defendant is the majority owner of the business or directly or indirectly controls the business, and where (2) the business is engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection, or assisting others engaged in telemarketing, or in the advertising, promotion, offering for sale or sale of credit card loss protection; 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 subsection A of this Section.

### **XIII.**

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

**IT IS FURTHER ORDERED** that within five (5) business days after receipt by defendants Mete Suatac and Jonathan Parkinson of this Order as entered by the Court, defendants Mete Suatac and Jonathan Parkinson shall each submit to the Commission a truthful sworn and notarized statement, in the form shown on **Appendix B**, that shall acknowledge receipt of this Final Order.

### **XIV.**

#### **RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court will retain jurisdiction of this matter for the purpose of enabling any of the parties to this Order to apply to the Court at any time for such further orders or directives as may be necessary or appropriate for the interpretation or modification of this Order, for the enforcement of compliance therewith or the punishment of violations thereof.

Defendants and the Commission, through their respective counsel, hereby consent to the terms and conditions of this Stipulation as set forth above and consent to the entry of an Order with the same terms.

FOR THE FEDERAL TRADE COMMISSION:

WILLIAM E. KOVACIC  
GENERAL COUNSEL

BARBARA ANTHONY  
REGIONAL DIRECTOR

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ROBIN E. EICHEN  
Senior Attorney

FOR THE DEFENDANTS:

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ANDREW COVE, ESQ.  
Cove & Associates, PA  
Attorneys for Defendants

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ICON AMERICA, INC.  
By:

---

9066-3451 QUEBEC, INC.,  
d/b/a SIERRA  
ENTERPRISES  
By:

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METE SUATAC  
individually, and as an officer  
of Icon America, Inc. and  
9066-3451 Quebec, Inc. d/b/a  
Sierra Enterprises

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JONATHAN PARKINSON  
individually, and as general  
manager of Icon America, Inc.  
and as customer service  
manager of 9066-3451  
Quebec, Inc., d/b/a Sierra  
Enterprises

**SO ORDERED**, this \_\_\_\_\_ day of \_\_\_\_\_, 2002, at \_\_\_\_\_

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WILLIAM K. SESSIONS, III  
UNITED STATES DISTRICT JUDGE

**Appendix A**

**Copy of Telemarketing Sales Rule**

**Appendix B**

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 2:01-CV-320
	)	
ICON AMERICA, INC., a Florida	)	
corporation,	)	
	)	
9066-3451 QUEBEC, INC., d/b/a	)	
SIERRA ENTERPRISES, a	)	
Quebec corporation,	)	
	)	
METE SUATAC, individually and doing	)	AFFIDAVIT OF DEFENDANT
business as ICON AMERICA, INC.,	)	METE SUATAC
and	)	
	)	
JONATHAN PARKINSON, a/k/a	)	
JONATHAN PARKS, individually and	)	
doing business as ICON AMERICA, INC.,	)	
	)	
Defendants.	)	

Mete Suatac, being duly sworn, hereby states and affirms as follows:

1. My name is Mete Suatac. My current residence address is

\_\_\_\_\_. I am a citizen of \_\_\_\_\_

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

2. I am a defendant in *FTC v. Icon America Inc., et al.* (United States District Court for the District of Vermont).

3. On \_\_\_\_\_, I received a copy of the Stipulated Final Judgment and Order for Permanent Injunction, which was signed by the Honorable William K. Sessions, III and entered by the Court on \_\_\_\_\_. A true and correct copy of the Order I received is appended to this Affidavit.

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

\_\_\_\_\_  
Metu Suatac

State of \_\_\_\_\_  
City of \_\_\_\_\_  
County of \_\_\_\_\_  
Country of \_\_\_\_\_

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

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

**Appendix B**

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 2:01-CV-320
	)	
ICON AMERICA, INC., a Florida	)	
corporation,	)	
	)	
9066-3451 QUEBEC, INC., d/b/a	)	
SIERRA ENTERPRISES, a	)	
Quebec corporation,	)	
	)	
METE SUATAC, individually and doing	)	AFFIDAVIT OF DEFENDANT
business as ICON AMERICA, INC.,	)	JONATHAN PARKINSON
and	)	
	)	
JONATHAN PARKINSON, a/k/a	)	
JONATHAN PARKS, individually and	)	
doing business as ICON AMERICA, INC.,	)	
	)	
Defendants.	)	

Jonathan Parkinson, being duly sworn, hereby states and affirms as follows:

1. My name is Jonathan Parkinson. My current residence address is \_\_\_\_\_  
\_\_\_\_\_. I am a citizen of \_\_\_\_\_

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

2. I am a defendant in *FTC v. Icon America Inc., et al.* (United States District Court for the District of Vermont).

3. On \_\_\_\_\_, I received a copy of the Stipulated Final Judgment and Order for Permanent Injunction, which was signed by the Honorable William K. Sessions, III and entered by the Court on \_\_\_\_\_. A true and correct copy of the Order I received is appended to this Affidavit.

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

---

Jonathan Parkinson

State of \_\_\_\_\_

City of \_\_\_\_\_

County of \_\_\_\_\_

Country of \_\_\_\_\_

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

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Notary Public

My Commission Expires:

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