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CLERK, U.S. DISTRICT COURT
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CENTRAL DISTRICT OF CALIFORNIA
DEPUTY

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA
[WESTERN DIVISION]**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**WORLD TRADERS
ASSOCIATION, INC., et al.**

Defendants.

Case No. CV-05-591 (AHM)(Ctx)

**STIPULATED JUDGMENT AND
ORDER FOR PERMANENT
INJUNCTION AS TO
DEFENDANTS SHELDON
FIDLER; WORLD TRADERS
ASSOCIATION, INC.; UNITED
TRADERS ASSOCIATION, INC.;
INTERNATIONAL
MERCHANDISE GROUP, INC.;
TRANS-GLOBAL
CONNECTION, INC.;
MUSKETEER PARTNERS, INC.;
FULFILLMENT OPTIONS, INC.;
INTERNATIONAL
ASSOCIATES WORLDWIDE,
INC.; MAGNA DELTA, LLC;
AND OFFICE OPTIONS, LLC**

THIS MATTER comes before the Court upon the stipulation of Plaintiff Federal Trade Commission ("Commission" or "FTC") and Defendants Sheldon Fidler; World Traders Association, Inc.; United Traders Association, Inc.; International Merchandise Group, Inc.; Trans-Global Connection, Inc.; Musketeer Partners, Inc.; Fulfillment Options, Inc.; International Associates Worldwide, Inc.; Magna Delta, LLC; and Office Options, LLC (collectively, "Defendants").

On January 25, 2005, the FTC filed a Complaint for a Permanent Injunction and Other Relief, including redress to consumers, pursuant to Sections 13(b) and

1 19(a) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 53(b) and
2 57b(a), and applied *ex parte* for a Temporary Restraining Order pursuant to Rule
3 65 of the Federal Rules of Civil Procedure. The Commission charged that
4 Defendants engaged with other named defendants in deceptive acts or practices in
5 violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a), and the Commission’s
6 Rule entitled Disclosure Requirements and Prohibitions Concerning Franchise and
7 Business Opportunity Ventures (the “Franchise Rule”), 16 C.F.R. Part 436 (2004),
8 in the marketing and sale of an alleged business opportunity to become an affiliate
9 in a network of brokers selling surplus goods. On January 25, 2005 — the same
10 day the Complaint was filed — the Court issued a Temporary Restraining Order
11 with an asset freeze, appointment of a Receiver, and other ancillary equitable relief
12 (“TRO”). On February 22, 2005, upon stipulation of the parties, the Court entered
13 a preliminary injunction. In addition to continuing the relief in the TRO, the
14 preliminary injunction contained a ban against Defendants’ involvement with
15 business ventures involving the sale or purchase of discounted or surplus goods.
16 On April 6, 2005, the FTC filed an Amended Complaint adding additional
17 defendants.
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22 The Commission and Defendants hereby stipulate to the entry of, and
23 request the Court to enter, this Stipulated Judgment and Order for Permanent
24 Injunction (“Final Order”) to resolve all matters of dispute between them in this
25 action, without trial or adjudication of any issue of fact or law.
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1 **IT IS THEREFORE STIPULATED, AGREED, AND ORDERED** as
2 follows:

3 1. This Court has jurisdiction of the subject matter of this case and
4 jurisdiction over the Defendants.

5 2. Venue in this District is proper under 15 U.S.C. § 53(b) and 28 U.S.C.
6 § 1391(b) and (c).

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

9 4. The Amended Complaint states a claim upon which relief may be
10 granted against Defendants under Sections 5(a), 13(b), and 19 of the FTC Act, 15
11 U.S.C. §§ 45(a), 53(b), and 57b, and the Franchise Rule, 16 C.F.R. Part 436
12 (2004).

13 5. Defendants have entered into this Final Order freely and without
14 coercion. Defendants further acknowledge that they have read the provisions of
15 this Final Order and are prepared to abide by them.

16 6. The Plaintiff and Defendants have agreed that the entry of this Final
17 Order resolves all matters of dispute between them arising from the Amended
18 Complaint in this action, up to the date of entry of this Final Order.

19 7. Defendants waive all rights to seek appellate review or otherwise
20 challenge or contest the validity of this Final Order. Defendants further waive and
21 release any claims they may have against the Commission, its employees,
22 representatives, or agents.

1 8. Defendants agree that this Final Order does not entitle Defendants to
2 seek or to obtain attorneys' fees as a prevailing party under the Equal Access to
3 Justice Act, 28 U.S.C. § 2412, as amended by Pub. L. 104-121, 110 Stat. 847, 863-
4 864 (1996), and Defendants further waive any rights to attorneys' fees that may
5 arise under said provision of law.
6

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

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

11 11. This Final Order is for settlement purposes only, and does not
12 constitute an admission by Defendants that the law has been violated as alleged in
13 the Amended Complaint, or that the facts as alleged in the Amended Complaint,
14 other than jurisdictional facts, are true. However, for the purposes of bankruptcy
15 proceedings, this Final Order is governed by Paragraph III.H.
16

17 DEFINITIONS

18 1. "Assets" means any legal or equitable interest in, right to, or claim to,
19 any real and personal property, including, but not limited to, chattel, goods,
20 instruments, equipment, fixtures, general intangibles, inventory, checks, notes,
21 leaseholds, effects, contracts, mail or other deliveries, shares of stock, lists of
22 consumer names, accounts, credits, premises, receivables, funds, and cash,
23 wherever located, whether in the United States or abroad;
24

25 2. "Business Venture" means any written or oral business arrangement,
26 however denominated, regardless of whether covered by the Franchise Rule or
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28

1 Business Opportunity Rule, which consists of the payment of any consideration in
2 exchange for:

- 3 a. the right or means to offer, sell, or distribute goods or services
4 (regardless of whether identified by a trademark, service mark,
5 trade name, advertising, or other commercial symbol); and
6
7 b. more than nominal assistance to any person or entity in
8 connection with or incident to the establishment, maintenance,
9 or operation of a new business or the entry by an existing
10 business into a new line or type of business;
11

12 3. "Franchise Rule" means the FTC Trade Regulation Rule titled
13 "Disclosure Requirements and Prohibitions Concerning Franchising," codified at
14 16 C.F.R. Part 436, or as it may be amended;
15

16 4. "Business Opportunity Rule" means the FTC Trade Regulation Rule
17 titled "Disclosure Requirements and Prohibitions Concerning Business
18 Opportunities," codified at 16 C.F.R. Part 437, or as it may be amended;
19

20 5. "Individual Defendant" means Sheldon Fidler;

21 6. "Corporate Defendants" means World Traders Association, Inc.;
22 United Traders Association, Inc.; International Merchandise Group, Inc.; Trans-
23 Global Connection, Inc.; Musketeer Partners, Inc.; Fulfillment Options, Inc.;
24 International Associates Worldwide, Inc.; Magna Delta, LLC; and Office Options,
25 LLC; individually, collectively, or in any combination;
26

27 7. "Defendants" means the Individual and Corporate Defendants as
28

1 defined herein, individually, collectively, or in any combination;

2 8. "Document" is synonymous in meaning and equal in scope to the
3 usage of the term in Fed. R. Civ. P. 34(a), and includes writings, drawings, graphs,
4 charts, photographs, audio and video recordings, computer records, and other data
5 compilations from which information can be obtained and translated, if necessary,
6 through detection devices into reasonably usable form. A draft or non-identical
7 copy is a separate document within the meaning of the term;

8
9 9. "Receiver" shall mean Robb Evans and Associates, the Receiver
10 appointed by the Court in this matter over Receivership Defendants; and

11
12 10. "Receivership Defendants" shall mean the Corporate Defendants.

13 **ORDER**

14 **I. BAN AGAINST ANY INVOLVEMENT BY DEFENDANTS IN THE**
15 **OFFER OR SALE OF A BUSINESS VENTURE**

16
17 **IT IS THEREFORE ORDERED** that Defendants are hereby permanently
18 restrained and enjoined from:

19 A. Advertising, marketing, promoting, offering for sale, or selling any
20 business venture to any person;

21 B. Receiving any remuneration or other consideration of any kind
22 whatsoever from any business entity engaged in or assisting in the advertising,
23 marketing, promoting, offering for sale, or sale of any business venture;

24 C. Holding any ownership interest, share, or stock in any business entity
25 engaged in or assisting in the advertising, marketing, promoting, offering for sale,
26 or sale of any business venture;
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1 D. Serving as an employee, officer, director, trustee, general manager of,
2 or consultant or advisor to, any business entity engaged in or assisting in the
3 advertising, marketing, promoting, offering for sale, or sale of any business
4 venture;

5
6 *Provided, however,* nothing in this Section I shall prohibit Defendants from selling
7 any good or service that is not a Business Venture.

8 **II. PROHIBITION AGAINST VIOLATION OF SECTION 5**
9 **OF THE FEDERAL TRADE COMMISSION ACT**

10 **IT IS FURTHER ORDERED** that, in connection with the offering for sale
11 or sale of any good or service, Defendants and their agents, employees, officers,
12 corporations, successors, assigns, and all those persons in active participation with
13 them who receive actual notice of this Order by personal service or otherwise, are
14 hereby permanently restrained and enjoined from:
15

16 A. Misrepresenting, directly or by implication, to any potential purchaser
17 of goods or services, any material fact, including, but not limited to:
18

19 1. The total cost to purchase, receive, or use, and the quantity of,
20 any goods or services that are subject to the sales offer;

21 2. Any material restrictions, limitations, or conditions to purchase,
22 receive, or use the goods or services;

23 3. Any material aspect of the nature or terms of a refund,
24 cancellation, exchange or repurchase policy for the goods or services; or
25

26 4. The income, profits, or sales volume likely to be achieved from
27 the purchase of any goods or services; and
28

1 B. Providing substantial assistance to any third party to make any
2 material misrepresentation, including, but not limited to, those misrepresentations
3 prohibited by Paragraph II.A, above.
4

5 **III. MONETARY JUDGMENT**

6 **IT IS FURTHER ORDERED** that:

7 A. Defendants are jointly and severally liable to the Commission for
8 Thirty Million Seven Hundred Seven Thousand Dollars (\$30,707,000), which the
9 FTC alleges is the amount of injury suffered by consumers, and the FTC is
10 awarded a monetary judgment in this amount; *provided, however*, that payment of
11 this judgment shall be suspended subject to the conditions set forth in Paragraph IV
12 of this Final Order; and *provided, further*, that the liability created by this judgment
13 shall be joint and several.
14

15
16 B. The judgment against the Defendants shall be satisfied by the transfer
17 to the Commission or Receiver of all dominion, title, and control to all assets
18 which previously have been frozen in this case, except that this transfer shall not
19 include the Individual Defendant's homestead located at 10923 Landale St., #5,
20 Toluca Lake, CA 91602. The Receiver's obligation to pay any expenses for the
21 Individual Defendant's homestead shall cease on the date of entry of this Final
22 Order.
23

24 C. Upon receipt by the Commission or Receiver of the assets required to
25 be transferred pursuant to Paragraph III.B, the freeze of the assets of the Individual
26 Defendants shall be lifted permanently and the Receiver shall release from the
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1 Receivership Estate the real property commonly known as 10923 Landale St., #5,
2 Toluca Lake, CA 91602.

3 D. Any and all funds paid pursuant to this Paragraph III or Paragraph IV
4 shall be deposited into a fund administered by the Commission or its agent to be
5 used for equitable relief, including, but not limited to, consumer redress and any
6 attendant expenses for the administration of any redress fund. In the event that
7 redress to purchasers is wholly or partially impracticable, or any funds remain after
8 redress is completed, the Commission may apply any remaining funds to such
9 other equitable relief (including consumer information remedies) as it determines
10 to be reasonably related to Defendants' practices alleged in the Amended
11 Complaint. Any funds not used for such equitable relief shall be deposited in the
12 United States Treasury as disgorgement. Defendants shall have no right to contest
13 the manner of distribution or other disposition of funds chosen by the Commission.
14 The Commission in its sole discretion may use a designated agent to administer
15 consumer redress.
16

17 F. In accordance with 31 U.S.C. § 7701, Defendants are hereby required,
18 unless they have done so already, to furnish to the Commission their taxpayer
19 identification numbers (Social Security numbers and employer identification
20 numbers), which shall be used for purposes of collecting and reporting on any
21 delinquent amount arising out of Defendants' relationship with the government.
22

23 G. The Individual Defendant is further required, unless he has done so
24 already, to provide the Commission with clear, legible and full-size photocopies of
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1 all valid driver's licenses he possesses, which will be used for reporting and
2 compliance purposes.

3 H. Defendants agree that the facts as alleged in the Amended Complaint
4 filed in this action shall be taken as true in any subsequent civil litigation pursued
5 by the Commission to enforce its rights pursuant to this Final Order, including, but
6 not limited to, a nondischargeability complaint in any bankruptcy proceeding.
7

8 IV. RIGHT TO REOPEN

9 A. The Commission's agreement to this Final Order is expressly
10 premised upon the financial condition of the Individual Defendant as represented
11 in his sworn financial statement dated January 31, 2005, and supporting documents
12 that he provided to the Commission, all of which include material information
13 upon which the Commission relied in negotiating and consenting to this Final
14 Order.
15

16 B. If, upon motion by the Commission, this Court finds that the
17 Individual Defendant made a material misrepresentation or omitted material
18 information concerning his financial condition, then the Court shall lift any
19 suspension of the judgment and direct the Clerk to enter judgment against the
20 Individual Defendant in favor of the Commission for the full amount of Thirty
21 Million Seven Hundred Seven Thousand Dollars (\$30,707,000). This amount shall
22 be immediately due and payable, together with interest computed at the rate
23 prescribed under 28 U.S.C. § 1961, as amended, less the sum of any payments
24 previously made by Defendants pursuant to this Final Order.
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1 C. Any proceedings instituted under this Paragraph IV are in addition to,
2 and not in lieu of, any other civil or criminal remedies as may be provided by law,
3 including any other proceedings that the FTC may initiate to enforce this Final
4 Order.
5

6 **V. ACKNOWLEDGMENT OF RECEIPT OF ORDER**

7 **IT IS FURTHER ORDERED** that, within five (5) business days of receipt
8 of this Final Order as entered by the Court, the Individual Defendant must submit
9 to the Commission a truthful sworn statement acknowledging receipt of this Final
10 Order.
11

12 **VI. DISTRIBUTION OF ORDER BY DEFENDANTS**

13 **IT IS FURTHER ORDERED** that, for a period of five (5) years from the
14 date of entry of this Final Order, each of the Defendants shall deliver copies of this
15 Final Order as directed below:
16

17 A. **Corporate Defendants:** Each Corporate Defendant must deliver a
18 copy of this Final Order to all of its principals, officers, directors, and managers.
19 Each Corporate Defendant also must deliver copies of this Final Order to all of its
20 employees, agents, and representatives who engage in conduct related to the
21 subject matter of the Final Order. For current personnel, delivery shall be within
22 five (5) days of service of this Final Order upon Defendant. For new personnel,
23 delivery shall occur prior to their assumption of their responsibilities;
24

25 B. **Individual Defendant as Control Persons:** For any business that the
26 Individual Defendant controls, directly or indirectly, or in which he has a majority
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1 ownership interest, the Individual Defendant must deliver a copy of this Final
2 Order to all principals, officers, directors and managers of that business. The
3 Individual Defendant must also deliver copies of this Final Order to all employees,
4 agents and representatives of the business who engage in the offer or sale of
5 opportunities, goods, or services for investment or income-production. For current
6 personnel, delivery shall be within five (5) days of service of this Final Order upon
7 the Individual Defendant. For new personnel, delivery shall occur prior to their
8 assumption of their responsibilities;
9

10
11 **C. Individual Defendant as Employee or Non-Control Person:** For
12 any business where the Individual Defendant is not a controlling person of the
13 business but otherwise engages in the offer or sale of opportunities, goods, or
14 services for investment or income-production, the Individual Defendant must
15 deliver a copy of this Final Order to all principals and managers of such business
16 before engaging in such conduct; and
17

18 **D.** The Individual Defendant must secure a signed and dated statement
19 acknowledging receipt of the Final Order within thirty (30) days of delivery, from
20 all persons receiving a copy of the Final Order pursuant to this Paragraph VI.
21

22 **VII. COMPLIANCE REPORTING BY DEFENDANTS**

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

25 **A.** For a period of five (5) years from the date of entry of this Final
26 Order:
27
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1 1. The Individual Defendant shall notify the Commission in
2 writing of the following:

3 a. Any changes in the Individual Defendant's residence,
4 mailing addresses, and telephone numbers, within ten (10) days of the date of such
5 change;

6 b. Any changes in the Individual Defendant's employment
7 status (including self-employment), and any change in the ownership of the
8 Individual Defendant in any business entity, within ten (10) days of such change.

9 Such notice shall include the name and address of each business that the Individual
10 Defendant is affiliated with, employed by, creates or forms, or performs services
11 for; a statement of the nature of the business; and a statement of the Individual
12 Defendant's duties and responsibilities in connection with the business or
13 employment; and
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17 c. Any changes in the Individual Defendant's name, and
18 any aliases or fictitious names adopted or used by the Individual Defendant.

19 2. The Individual and each Corporate Defendant shall notify the
20 Commission of any changes in the corporate structure of the Corporate Defendants
21 or any business entity that the Individual Defendant directly or indirectly controls,
22 or has a majority ownership interest in, that may affect compliance obligations
23 arising under this Final Order — including but not limited to a dissolution,
24 assignment, sale, merger, or other action that would result in the emergence of a
25 successor entity; the creation or dissolution of a subsidiary, parent, or affiliate that
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1 engages in any acts or practices subject to this Final Order; the filing of a
2 bankruptcy petition; or a change in the corporate name or address — at least 30
3 days prior to such change; provided that, with respect to any proposed change in
4 such a business entity about which the Defendant learns less than thirty (30) days
5 prior to the date such action is to take place, the Defendant shall notify the
6 Commission as soon as is practicable after obtaining such knowledge.
7

8 B. One hundred eighty (180) days after the date of entry of this Final
9 Order, and each year thereafter on the same date, through and including calendar
10 year 2012, the Corporate Defendants and the Individual Defendant shall each
11 provide a written report to the FTC, sworn to under penalty of perjury, setting forth
12 in detail the manner and form in which they have complied and are complying with
13 this Final Order. This report shall include, but not be limited to:
14

15 1. For the Individual Defendant:

16 a. The then-current residence address, mailing addresses,
17 and telephone numbers of the Individual Defendant;
18

19 b. The then-current employment and business addresses and
20 telephone numbers of the Individual Defendant, a description of the business
21 activities of each such employer or business, and the title and responsibilities of the
22 Individual Defendant, for each such employer or business; and
23

24 c. Any other changes required to be reported under
25 Paragraph VII.A of this Final Order.
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1 2. For all Defendants:

2 a. A copy of each acknowledgment of receipt of this Final
3 Order, obtained pursuant to Paragraph VI of this Final Order; and

4 b. Any other changes required to be reported under
5 Paragraph VII.A of this Final Order.

6
7 C. For the purposes of this Final Order, the Defendants shall, unless
8 otherwise directed by the Commission's authorized representatives, mail all written
9 notifications to the FTC to:

10
11 Associate Director for Enforcement
12 Federal Trade Commission
13 600 Pennsylvania Ave., NW
14 Washington, DC 20580
15 Re: *FTC v. World Traders Association, Inc.*,
16 Case No. CV 05-0591 (C.D. Cal.)

17 D. For the purposes of this Paragraph VII, "employment" includes the
18 performance of services as an employee, consultant, or independent contractor; and
19 "employers" include any individual or entity for whom a Defendant performs
20 services as an employee, consultant, or independent contractor.

21 E. For purposes of the compliance reporting and monitoring required by
22 this Final Order, the Commission is authorized to communicate directly with each
23 of the Defendants.

24 **VIII. RECORD-KEEPING PROVISIONS**

25 **IT IS FURTHER ORDERED** that, for a period of eight (8) years from the
26 date of entry of this Final Order, in connection with any business that the
27 Individual Defendant directly or indirectly manages, controls, or has a majority
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1 ownership interest in, the Individual Defendant is hereby permanently restrained
2 and enjoined from failing to create and retain the following records:

3 A. Accounting records that reflect the cost of goods or services sold,
4 revenues generated, and the disbursement of such revenues;

5 B. Personnel records accurately reflecting: the name, address, and
6 telephone number of each person employed in any capacity by such business,
7 including as an independent contractor; that person's job title or position; the date
8 upon which the person commenced work; and the date and reason for the person's
9 termination, if applicable;

10 C. Customer files containing the names, addresses, telephone numbers,
11 dollar amounts paid, quantity of items or services purchased, and a description of
12 the items or services purchased, to the extent such information is obtained in the
13 ordinary course of business;

14 D. Complaints and refund requests (whether received directly, indirectly
15 or through any third party) and any responses to those complaints or requests;

16 E. Copies of all sales scripts, training materials, advertisements, or other
17 marketing materials disseminated by the business or the Individual Defendant to
18 any person, including e-mail and Internet web sites or web pages, relating to any
19 good, service, company or web site of the business or the Individual Defendant;
20 and

21 F. All records and documents necessary to demonstrate fully the
22 Individual Defendant's compliance with each provision of this Final Order.
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IX. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring and investigating compliance with any provision of this Final Order,

A. Within ten (10) days of receipt of written notice from a representative of the Commission, the Individual Defendant shall submit additional written reports, sworn to under penalty of perjury; produce documents for inspection and copying; appear for deposition; and/or provide entry during normal business hours to any business location in the Individual Defendant's possession or direct or indirect control for inspection of the business operation;

B. In addition, the Commission is authorized to monitor compliance with this Final Order by all other lawful means, including but not limited to, the following:

1. Obtaining discovery from any person, without further leave of court, using the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45; and

2. Posing as consumers or suppliers to: Defendants, their employees, or any entity managed or controlled in whole or in part by Defendants, without the necessity of identification or prior notice; and

C. The Individual Defendant shall permit representatives of the Commission to interview any employer, consultant, independent contractor, representative, agent, or employee who has agreed to such an interview, relating in any way to any conduct subject to this Final Order. The person interviewed may

1 have counsel present.

2 *Provided, however,* that nothing in this Final Order shall limit the
3 Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of
4 the FTC Act, 15 U.S.C. §§ 49, 57b-1, to obtain any documentary material, tangible
5 things, testimony, or information relevant to unfair or deceptive acts or practices in
6 or affecting commerce (within the meaning of 15 U.S.C. § 45(a)(1)).
7

8 **X. PROHIBITIONS INVOLVING CONSUMER LISTS**

9 **IT IS FURTHER ORDERED** that each of the Defendants is hereby
10 permanently restrained and enjoined from selling, renting, leasing, transferring, or
11 otherwise disclosing the name, address, telephone number, credit card number,
12 bank account number, e-mail address, or other identifying information of any
13 person who paid any money to any defendant in this action, at any time prior to
14 entry of this Final Order, in connection with the advertising, promotion, marketing,
15 offering for sale, or sale of any good or service; *provided, however,* that
16 Defendants may disclose such identifying information to a law enforcement
17 agency, or as required by any law, regulation or court order.
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21 **XI. COOPERATION WITH RECEIVER**

22 **IT IS FURTHER ORDERED** that, so long as the Receivership remains in
23 effect, Defendants shall cooperate fully with the Receiver in: (a) pursuing any and
24 all claims by the Receivership against third parties; (b) assisting the Receiver in
25 defending any and all actions or claims brought against the Receivership by third
26 parties; and (c) executing any documents necessary to transfer assets or ownership
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1 interests to the Receiver pursuant to the terms of this Final Order.

2 **XII. PRIOR RECEIVERSHIP POWERS**

3 **IT IS FURTHER ORDERED** that, to the extent they are not inconsistent
4 with this Final Order, all powers granted to the Receiver pursuant to the Court's
5 Preliminary Injunction of February 22, 2005, shall remain in full force and effect.
6

7 **XIII. WINDING UP OF RECEIVERSHIP DEFENDANTS**

8 **IT IS FURTHER ORDERED** that the Receiver shall liquidate all assets of
9 the Receivership Defendants and the Receivership estate and wind up all activities
10 and operations of Receivership Defendants and their subsidiary and affiliated
11 entities. Upon approval of the Court, and the Court's issuance of an Order for
12 Final Payment, the Receiver shall transfer to the Commission or its agent all funds
13 in the Receivership estate, less fees and expenses as allowed by the Court, toward
14 satisfaction of the judgment entered herein.
15
16

17 **XIV. COMPENSATION OF RECEIVER**

18 **IT IS FURTHER ORDERED** that the Receiver and those he employs are
19 entitled to reasonable compensation for the performance of duties pursuant to this
20 Order and for the costs of actual out-of-pocket expenses incurred by them, said
21 compensation to come from Receivership assets held by or in the possession or
22 control of, or which may be received by, the Receiver or Receivership Defendants.
23

24 **XV. TERMINATION OF RECEIVERSHIP**

25 **IT IS FURTHER ORDERED**, that the Receiver shall, if he has not already
26 done so, file his final report and request for fees and expenses within 180 days of
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1 the execution of this Final Order, unless good cause is shown to extend the
2 Receivership beyond 180 days. The Receiver's final report and request for fees
3 and expenses shall be served upon the parties through counsel. Plaintiff may
4 object within 15 days of receipt, but Defendants shall have no right to object.
5 Upon submission of the Receiver's final report or upon this Court's Order for Final
6 Payment, whichever is later, and subject to the terms set forth in Section XIII
7 herein, the Receivership shall terminate.
8

9
10 **XVI. FEES AND COSTS**

11 **IT IS FURTHER ORDERED** that each party to this Final Order hereby
12 agrees to bear its own costs and attorneys' fees incurred in connection with this
13 action.
14

15 **XVII. RETENTION OF JURISDICTION**

16 **IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this
17 action for purposes of construction, modification and enforcement of this Final
18 Order.
19

20 **XVIII. ENTRY OF ORDER**


21 **IT IS FURTHER ORDERED** that there is no just reason for delay, and the
22 Clerk of Court is hereby directed to enter this Final Order immediately.
23

24 **XIX. COMPLETE SETTLEMENT**

25 The parties hereby consent to entry of this Final Order, which shall
26 constitute a final judgment and order in this matter. The parties further stipulate
27 and agree that the entry of this Final Order shall constitute a full, complete, and
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1 final settlement of this action.

2
3 SO ORDERED, this 4th day of April, 2008.

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5 
6 A. HOWARD MATZ
7 United States District Judge

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9
10 **STIPULATED BY:**

11 **FOR PLAINTIFF:**

12
13 Richard McKewen
14 Richard McKewen (DC Bar # 482969)
15 E-mail: rmckewen@ftc.gov
16 Federal Trade Commission
17 600 Pennsylvania Avenue, NW, H-286
18 Washington, DC 20580
19 Phone: (202) 326-3071
20 Fax: (202) 326-3395

21 Kenneth Abbe (CA Bar #172416)
22 E-mail: kabbe@ftc.gov
23 Federal Trade Commission
24 Western Region
25 10877 Wilshire Blvd., Ste. 700
26 Los Angeles, CA 90024
27 Phone: (310) 824-4318
28 Fax: (310) 824-4380

Date: 4/2/08

ATTORNEYS FOR PLAINTIFF

FOR DEFENDANTS:

Sheldon Fidler, pro se
Sheldon Fidler, *pro se*
Date: 2/29/08


[Signature]
[Name/Title]
World Traders Association, Inc.
Date: 2/29/08

[Signature]
[Name/Title]
United Traders Association, Inc.
Date: 2/29/08


[Signature]
[Name/Title]
International Merchandise Group, Inc.
Date: 2/29/08

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FOR DEFENDANTS (CONT'D):




[Name/Title]
Trans-Global Connection, Inc.
Date: 2/29/08




[Name/Title]
Musketeer Partners, Inc.
Date: 2/29/08




[Name/Title]
Fulfillment Options, Inc.
Date: 2/29/08



[Name/Title]
International Associates Worldwide, Inc.
Date: 2/29/08



[Name/Title]
Magna Delta, LLC
Date: 2/29/08



[Name, Title]
Office Options, LLC
Date: 2/29/08