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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

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STEPHEN J. WINTER, CLERK
U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF INDIANA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

OMNI ADVERTISING, INC.,
a corporation,

- and -

CHRISTOPHER EHRHORN, also d/b/a
FRI, INC.,
AMERICAN DEPUTY SHERIFFS' ASSOCIATION,
DISABLED FIREFIGHTERS,
individually and as an officer of the corporate defendant,

- and -

STACEY STANLEY, also d/b/a
FRI, INC.,
AMERICAN DEPUTY SHERIFFS' ASSOCIATION,
DISABLED FIREFIGHTERS,
individually and as an officer of the corporate defendant,

Defendants.

CIVIL NO: 1:98CV0301

JUDGE WILLIAM C. LEE

U.S. MAGISTRATE JUDGE
ROGER B. COSBEY

X9990001

STIPULATED FINAL JUDGMENT AND ORDER

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), filed its complaint pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), charging defendants with violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). On October 5, 1998, this Court granted, and on October 7, 1998, it amended, the FTC's motion for a

temporary restraining order with asset freeze, appointment of a temporary receiver and other equitable relief, and ordered defendants to show cause why a preliminary injunction should not issue against them. The parties subsequently agreed to entry of a stipulated preliminary injunction, which this Court granted on October 16, 1998.

NOW, the FTC, by and through its counsel, and defendants Omni Advertising, Inc., Christopher Ehrhorn, and Stacey Stanley, by and through their counsel, have agreed to the entry of this Stipulated Final Judgment and Order ("Order") by this Court, to resolve all matters of dispute between them in this action without trial or adjudication of any issue of law or fact. The said parties having requested the Court to enter this Order, it is therefore ORDERED, ADJUDGED AND DECREED as follows:

FINDINGS

1. This Court has jurisdiction over the subject matter of this case and has jurisdiction over the defendants. Venue in the Northern District of Indiana is proper.
2. The Complaint states a claim upon which relief may be granted under Sections 5(a) and 13(b) of the FTC Act, 15 U.S.C. §§ 45(a) and 53(b).
3. The Commission has the authority under Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), to seek the relief it has requested.
4. The activities of defendants are in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
5. Defendants Christopher Ehrhorn and Stacey Stanley are the owners of FRI, Inc., an unincorporated business located in Fort Wayne, Indiana. At all times material to this proceeding, individually or in concert with others, they have formulated, directed, controlled and participated in

the acts and practices of FRI, Inc. While operating under the name FRI, Inc., defendants also did business under the names American Deputy Sheriffs' Association, Foundation for Disabled Firefighters, and other names.

6. Defendants Christopher Ehrhorn and Stacey Stanley are the owners, officers, and operators of defendant Omni Advertising, Inc., an Indiana corporation. At all times material to this proceeding, individually or in concert with others, they have formulated, directed, controlled and participated in the acts and practices of defendant Omni Advertising, Inc. Defendant Omni Advertising, Inc. also did business under the names Fire Safety Handbook, Fire Prevention Coloring Book, Substance Abuse Activity Guide, Drug Prevention Activity Book, and other names.

7. By stipulating and consenting to the entry of this Order, defendants do not admit any of the allegations in the Complaint, except those contained in paragraphs 1 through 6 herein. Likewise, by executing this Order, plaintiff does not admit that any defense to the Complaint is valid.

8. This civil action and the relief awarded herein is in addition to, and not in lieu of, other remedies as may be provided by law, including both civil and criminal remedies.

9. Defendants enter into this Order freely and without coercion and acknowledge that they understand the provisions of this Order and are prepared to abide by its terms. At all times, defendants have been represented by counsel, including throughout the negotiations that led to this Order.

10. Defendants waive all rights to seek judicial review or otherwise challenge or contest the validity of this Order, and further waive and release any claims defendants may have against the Commission and the Commission's employees, agents, or representatives. Defendants also waive any claim they may have under the Equal Access to Justice Act.

11. Any voluntary bankruptcy petition filed by defendants does not automatically stay this action, which the Court finds is the “commencement or continuation of any action or proceeding by a governmental unit to enforce such governmental unit’s police or regulatory power” as set forth in 11 U.S.C. § 362(b)(4).

12. Any voluntary bankruptcy petition filed by any defendant does not divest this Court of jurisdiction to enter this final judgment against defendants.

13. Defendants expressly agree that they will not seek to have the judgment under this Order discharged by any proceeding under the U.S. Bankruptcy Code, 11 U.S.C. § 101 *et. seq.*, and defendants further agree that the judgment under this Order is not so dischargeable. This Order is without prejudice to the rights of the Commission to prove non-dischargeability of the liability under this Order in any bankruptcy proceeding filed by or against defendants.

14. Entry of this Order is in the public interest.

DEFINITIONS

For purposes of this Order, the following definitions shall apply:

1. “Defendants” means Omni Advertising, Inc., Christopher Ehrhorn, individually, as an officer of Omni Advertising, Inc., and doing business as, *inter alia*, FRI, Inc., and Stacey Stanley, individually, as an officer of Omni Advertising, Inc., and doing business as, *inter alia*, FRI, Inc., and each of them.

2. “Consumer” includes any individual, group, unincorporated association, limited or general partnership, corporation or other business entity.

3. “Contribution” means money or any item of value provided in response to a solicitation made on behalf of, or in the name of, any nonprofit organization including any payment

for advertising or any listing in any magazine, journal, or other publication produced by or on behalf of or in the name of any nonprofit organization. As used in this definition, "nonprofit organization" means any person that is, or is represented to be, a nonprofit entity or that has, or is represented to have, a charitable purpose, specifically including any entity that claims to benefit, either in whole or in part, purported law enforcement, firefighting, drug education or veterans' organizations, personnel, or programs.

4. "Person" means a natural person, organization or other legal entity, including a corporation, partnership, proprietorship, association, cooperative, government or governmental subdivision or agency, or any other group or combination acting as an entity.

5. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary, and to make the applicable phrase or sentence inclusive rather than exclusive.

ORDER

I

PERMANENT BAN

IT IS THEREFORE ORDERED that the defendants are hereby permanently restrained and enjoined from:

A. Engaging or participating — whether directly, in concert with others or through any business entity, investment or other device — in the offering for sale, sale, marketing or distribution of advertisements, listings, or sponsorships in any publication or program;

B. Engaging or participating — whether directly, in concert with others or through any business entity, investment or other device — in asking for or collecting contributions to any publication, program or organization; and

C. Using any aliases, pen names or pseudonyms, or otherwise misrepresenting their true identity in the course of business dealings or in publicly filed documents.

II

PROHIBITED BUSINESS ACTIVITIES

IT IS FURTHER ORDERED that, in connection with the offering for sale, sale, distribution, marketing or sponsorship of any advertisement, publication, program, product or service, and in connection with the collection of contributions to any publication, program, or organization, defendants and their agents, employees, officers, servants and attorneys, 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, are hereby permanently restrained and enjoined from:

A. Making any express or implied representation of material fact that is false or misleading, including, but not limited to, any misrepresentation concerning:

1. the distribution of any publication or program;
2. the printing or publishing of any publication;
3. agreement to approve, authorize or pay for advertising in any publication or program;
4. agreement to support or contribute to any publication, program, or organization;
5. prior approval of advertising or sponsorship of a publication or program by any person;
6. the printing of any advertisement or listing in reliance on prior authorization to do so;

7. any person's obligation to pay for any advertisement in or contribution to, any publication, program, or organization;
 8. the costs incurred in printing, publishing or distributing any advertisement, publication or program;
 9. any payment constituting a donation or contribution; and
 10. the use of contributions or donations.
- B. Using any alias, pen name, pseudonym or otherwise misrepresenting their true identity.

III

PROHIBITION AGAINST DISTRIBUTION OF CUSTOMER LISTS

IT IS FURTHER ORDERED that defendants and their agents, employees, officers, servants and attorneys, 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, are permanently restrained and enjoined from selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, credit card number, bank account number, or other identifying information of any person who paid any money to any defendant, at any time, in connection with the offering for sale, sale, distribution, or marketing of advertisements, listings, or sponsorships in, or contributions to, any publication, program or organization. *Provided, however,* that defendants may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

IV

JUDGMENT

IT IS FURTHER ORDERED that:

A. Judgment is entered against defendants in favor of the Commission in the amount of Eight Hundred Thousand Dollars (\$800,000) for equitable monetary relief, including but not limited to consumer redress. The Commission and the defendants agree that this sum represents the estimated loss to consumers arising from the activities described in the Commission's Complaint against defendants. Defendants are jointly and severally responsible for paying said judgment, less the amount transferred to the Commission pursuant to Sections IVB. and IVC., below, and Section V of this Order;

B. Defendant Ehrhorn shall pay said judgment within twenty (20) business days after the date of entry of this Order. Such payment shall be remitted to the Federal Trade Commission, Eaton Center—Suite 200, 1111 E. Superior Avenue, Cleveland, Ohio 44114, by certified or cashier's check. In partial satisfaction of this judgment against defendant Ehrhorn, Norwest Bank shall transfer, within ten (10) business days after entry of this Order, the following cash in the form of a certified cashiers' check to the Federal Trade Commission, Eaton Center—Suite 200, 1111 E. Superior Avenue, Cleveland, Ohio 44114:

1. all cash currently being held in account number 0085658846 in the name of Christopher Ehrhorn; and
2. all cash currently being held in an account of Christopher Ehrhorn's, account number 0086319456, in the name of Autoventures.

The defendants shall execute all documents necessary to effect the transfer of the funds in these accounts to the Commission;

C. In lieu of the foregoing monetary judgment against defendant Stanley, which shall be suspended subject to the conditions set forth in Section IVD., below, NBD Bank shall transfer, within ten (10) business days after entry of this Order, all cash currently being held in account number 715020405778 in the name of Stacey Stanley, in the form of a certified cashiers's check to the Federal Trade Commission, Eaton Center—Suite 200, 1111 E. Superior Avenue, Cleveland, Ohio 44114. Defendant Stanley shall execute all documents necessary to effect the transfer of the funds in this account to the Commission. After such transfer has been made to the Commission, the suspended judgment against defendant Stanley shall be extinguished, except as provided in Section IVD., below;

D. The Commission's agreement to suspend the judgment against defendant Stanley is expressly premised upon the truthfulness, accuracy, and completeness of the financial statement signed by defendant Stanley on November 28, 1999 and submitted to the FTC, and the deposition testimony of defendant Stanley regarding those statements given on January 14, 1999, both of which contain material information upon which the FTC has relied in negotiating and agreeing to the terms of this Order. If, upon motion by the Commission to the Court, the Court finds that defendant Stanley failed to disclose any material asset, or materially misrepresented the value of any asset, or made any other material misrepresentation in or omission from the financial statement or deposition testimony, the entire amount of the suspended judgment herein entered against defendant Stanley, less any amount defendants have paid, will be immediately due and payable, provided that the Commission will not seek an amount in excess of said judgment;

E. Within five (5) business days after entry of this Order, defendant Stanley shall submit to the Commission a truthful sworn statement, in the form that is Attachment A to this Order, that shall reaffirm and attest to the truth, accuracy, and completeness of the financial statement and

documentation described in Section IVD., above. The Commission is authorized to verify all information provided on the financial statement and other documentation with all appropriate third parties, including, but not limited to, financial institutions; and

F. The defendants shall cooperate fully with the Commission and its agents in all attempts to collect any amounts which become due pursuant to this Section. In such an event, the defendants agree to provide the Commission with their federal and state tax returns for the preceding three (3) years, and with full updated financial disclosures, in the form as was previously submitted by defendants as referenced and described in Section IVD., above, within ten (10) business days of receiving a request from the Commission to do so. The defendants further authorize the Commission to verify all information provided on their financial disclosure forms with all appropriate third parties, including but not limited to, financial institutions. The defendants are hereby required, in accordance with 31 U.S.C. § 7701, to furnish the FTC their respective taxpayer identifying numbers (social security numbers or employer identification numbers), which shall be used for purposes of collecting and reporting on any delinquent amount arising out of such persons' relationship with the government.

V

THE RECEIVERSHIP DEFENDANTS

IT IS FURTHER ORDERED that:

A. Any funds remaining after defendant Omni Advertising, Inc.'s and FRI, Inc.'s (hereafter collectively referred to as "receivership defendants") assets have been liquidated and the receiver — appointed by this Court pursuant to the Temporary Restraining Order entered October 5, 1998 and amended October 7, 1998, and continued by stipulation of the parties— has been

compensated, shall be transferred to the Commission, and subject to the conditions set forth in Section VI of this Order. Such payment shall be remitted to the Federal Trade Commission, Eaton Center—Suite 200, 1111 E. Superior Avenue, Cleveland, Ohio 44114, by certified or cashier's check;

B. Within thirty (30) business days upon entry of this Order, the receiver shall destroy, or turn over to plaintiff FTC, all records containing the types of customer information described in Section III of this Order;

C. Within thirty (30) business days upon entry of this Order, the receiver shall return all other records of the receivership defendants in the receiver's possession relating to the financial operation of the receivership defendants so that the defendants may prepare and file all necessary income tax returns; and

D. Within thirty (30) business days upon entry of this Order, the defendants shall file all necessary papers to legally dissolve defendant Omni Advertising, Inc., and shall concurrently mail to the Commission a copy of such papers accompanied by a sworn statement that such papers have been filed.

VI

CONSUMER REDRESS AND DISGORGEMENT

IT IS FURTHER ORDERED that:

A. Funds transferred to the Commission pursuant to Sections IV and V of this Order shall fully satisfy all monetary claims asserted by the Commission in the Complaint filed herein and shall be used to provide redress to defendants' victims and pay expenses of administering the redress fund;

B. If the Commission determines, in its sole discretion, that redress to purchasers is wholly or partially impracticable, any funds not so used shall be deposited into the United States

Treasury, or shall be used to educate consumers affected by the practices in the Commission's Complaint in this matter. Defendants shall have no right to contest the manner of distribution chosen by the Commission;

C. Defendants expressly waive any right to litigate the issue of disgorgement;

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

E. No portion of the money paid by defendants pursuant to this Order shall be deemed the payment of any fine, penalty, or punitive assessment.

VII

ASSET FREEZE LIFTED

IT IS FURTHER ORDERED that the freeze of defendant Ehrhorn's and defendant Stanley's assets, as ordered in Section II of the Temporary Restraining Order first entered in this matter on October 5, 1998, and continued by stipulation of the parties, shall be lifted upon: (i) entry of this Order; and (ii) defendants' payment to the FTC of the amount and in the manner set forth in numbers 1 and 2 of Section IVB., above, and Section IVC. of this Order.

VIII

RECORD KEEPING PROVISIONS

IT IS FURTHER ORDERED that for a period of five (5) years from the date of entry of this Order, each defendant, and such defendant's agents, employees, officers, servants and attorneys, 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, in connection with any business entity which such defendant is a majority owner, or which such defendant otherwise controls, shall create and maintain:

A. Records sufficient to demonstrate such defendant's compliance with the provisions of this Order;

B. Records containing the name, address, telephone number, and social security number of each person employed by such defendant in any capacity, that person's job title or position, the date upon which the employee commenced work, and the date and reason for the employee's termination;

C. Records containing the name and address of each person to whom such defendant sells, invoices, or ships any product for which the person pays Fifty Dollars (\$50.00) or more;

D. Records of every written or oral consumer complaint (including complaints referred from any third party, such as any office of the Better Business Bureau or any State Attorney General), and every refund request received by such defendant, which records shall include, to the extent that the information is available from the written complaint or the consumer is willing to provide the information:

1. The person's name, address, telephone number, and the dollar amount paid by the person;
2. The written complaint or refund request, if any, and the date of the complaint or refund request;
3. The basis of the complaint, including the name of any salesperson complained against, and the nature and result of any investigation conducted concerning any complaint;
4. Each response and the date of the response;

5. Any final resolution and date of resolution; and,
 6. In the event of a denial of a refund request, the reason for the denial, or if satisfied, the basis for determining that the complaint has been satisfied; and
- E. Copies of all sales scripts, training materials, advertisements, or other marketing materials that relate to any good or service offered for sale or sold by such defendant, or through agents of such defendant.

IX COMPLIANCE REPORTING

IT IS FURTHER ORDERED that in order that compliance with the provisions of this Order may be monitored, for a period of five (5) years commencing with the date of entry of this Order, each defendant shall notify the Commission of the following:

- A. Any change in residence, mailing addresses, and telephone numbers, within ten (10) business days of the date of such change;
- B. Any change of employment status (including self-employment), within ten (10) business days of such change. Such notice shall include the name and address of each business that the defendant is affiliated with or employed by, a statement of the nature of the business, and a statement of that defendant's duties and responsibilities in connection with the business; and
- C. Any proposed change in the structure of any business entity owned or controlled by either defendant, such as creation, incorporation, dissolution, assignment, sale, creation or dissolution of subsidiaries, or any other changes that may affect compliance obligations arising out of this Order, within thirty (30) days prior to the effective date of any proposed change; *provided, however*, that with respect to any proposed change in structure of such business about which either defendant learns

less than thirty (30) days prior to the date such action is to take place, such defendant shall notify the Commission as soon as practicable after learning of such proposed change.

X

ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that, within five (5) business days after receipt by the defendants of this Order as entered by the Court, each defendant shall submit to the Commission a truthful sworn statement, in the form that is Attachment B to this Order, that shall acknowledge receipt of this Order.

XI

THE FTC'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 means:

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 to defendants, their employees, or any other entity managed or controlled in whole or in part by defendants, without the necessity of 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 defendants have violated any provision of this Order or Section 5 of the FTC Act, 15 U.S.C. § 45.

XII

ORDER DISTRIBUTION

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

A. Immediately provide a copy of this Order to, and obtain a signed and dated acknowledgment of receipt of the same, from each officer, director, managing agent, employee, or independent contractor in any company or other business entity directly or indirectly owned, operated, or controlled by such defendant; and

B. Maintain, and upon reasonable notice make available to the FTC's representatives, the original and dated acknowledgments of the receipts required by this Section.

XIII

NOTICES

IT IS FURTHER ORDERED that for purposes of this Order, defendants shall, unless otherwise directed by the Commission's authorized representatives, mail all written notifications to the Commission to:

REGIONAL DIRECTOR
In Re: Omni Advertising, Inc., et al
Federal Trade Commission – Cleveland Regional Office
Eaton Center — Suite 200
1111 Superior Avenue, Cleveland, Ohio 44114

XIV

WAIVER OF CLAIMS

Defendants waive all claims under the Equal Access to Justice Act, 28 U.S.C. § 2412, as amended by Pub. L. No. 104-121, 110 Stat. 847, 863-64 (1996), and all rights to seek appellate review or otherwise challenge or contest the validity of this Order, or the temporary or preliminary orders entered in this proceeding, and further waive and release any claim they may have against the FTC, the receiver, or their employees, agents, or representatives.

XV

CONTINUED JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for the purpose of enabling the FTC and defendants 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.

SO ORDERED, this 13th day of AUGUST, 1999.



WILLIAM C. LEE
United States District Judge

STIPULATED TO:

FOR PLAINTIFF

The Federal Trade Commission

Dana C. Barragate
By: DANA C. BARRAGATE
Federal Trade Commission
Cleveland Regional Office
Eaton Center — Suite 200
1111 E. Superior Avenue
Cleveland, Ohio 44114

Date: August 12, 1999

FOR DEFENDANTS

Omni Advertising, Inc.
Christopher Ehrhorn
Stacey Stanley

J. L. Campbell
By: STANLEY L. CAMPBELL, ESQ.
Swanson, Campbell & Olivero
127 West Berry Street
Fort Wayne, Indiana 46802-2366

Date: 5-12-99.

Omni Advertising, Inc.:

OMNI ADVERTISING, INC., a corporation
By: [Signature]

Date: 5-13-99.

Christopher Ehrhorn:

[Signature]
By: CHRISTOPHER EHRHORN
Individually, as an officer of Omni Advertising,
Inc., and doing business as, *inter alia*, FRI, Inc.

Date: 5-12-99

Stacey Stanley:

Stacey Stanley
By: STACEY STANLEY
Individually, as an officer of Omni Advertising,
Inc., and doing business as, *inter alia*, FRI, Inc.

Date: 5-12-99.

ATTACHMENT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

OMNI ADVERTISING, INC.,
a corporation,

- and -

CHRISTOPHER EHRHORN, also d/b/a
FRI, INC.,
AMERICAN DEPUTY SHERIFFS' ASSOCIATION,
DISABLED FIREFIGHTERS,
individually and as an officer of the corporate defendant,

- and -

STACEY STANLEY, also d/b/a
FRI, INC.,
AMERICAN DEPUTY SHERIFFS' ASSOCIATION,
DISABLED FIREFIGHTERS,
individually and as an officer of the corporate defendant,

Defendants.

CIVIL NO. 1:98CV0301

JUDGE WILLIAM C. LEE

U.S. MAGISTRATE JUDGE
ROGER B. COSBEY

DECLARATION OF STACEY STANLEY

I, Stacey Stanley, depose and say as follows:

1. I have personal knowledge of the matters set forth below. I understand that the Plaintiff Federal Trade Commission, in the matter of *FTC v. Omni Advertising, Inc., et al.*, Civil No. 1:98CV 0301, pending in the United States District Court for the Northern District of Indiana,

Fort Wayne Division, has agreed to enter into an Order to settle this matter with limited contribution by me to consumer redress on the basis of my financial information provided to plaintiff Federal Trade Commission.

2. I further understand that in arriving at this decision, Plaintiff is relying on my assertion, which I reaffirm herein, that:

- a. all statements regarding my financial resources which were made by me in the deposition testimony I gave on January 14, 1999, are true and correct, and
- b. all disclosures included in the Financial Statement I signed pursuant to the Court's Temporary Restraining Order issued in this matter on October 5, 1998, continue to be true and correct.

3. I further attest that on this date that I have no other assets which would be required to be reported on the Financial Statement I signed pursuant to the Court's Temporary Restraining Order issued October 5, 1998.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and belief.

Executed on 5-12, 19 99.



Stacey Stanley

ATTACHMENT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

OMNI ADVERTISING, INC.,

a corporation,

- and -

CHRISTOPHER EHRHORN, also d/b/a

FRI, INC.,

AMERICAN DEPUTY SHERIFFS' ASSOCIATION,

DISABLED FIREFIGHTERS,

individually and as an officer of the corporate defendant,

- and -

STACEY STANLEY, also d/b/a

FRI, INC.,

AMERICAN DEPUTY SHERIFFS' ASSOCIATION,

DISABLED FIREFIGHTERS,

individually and as an officer of the corporate defendant,

Defendants.

CIVIL NO. 1:98CV0301

JUDGE WILLIAM C. LEE

U.S. MAGISTRATE JUDGE
ROGER B. COSBEY

AFFIDAVIT OF [DEFENDANT'S NAME]

I, [Defendant's Name], being duly sworn, hereby state and affirm as follows:

1. My name is [Defendant's Name]. My current residence address is [Street Address, City, State, ZIP Code]. I am a citizen of the United States and I 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. Omni Advertising, Inc., et al. (United States District Court for the Northern District of Indiana).

3. On [Date], I received a copy of the STIPULATED FINAL JUDGMENT AND ORDER, which was signed by the Honorable Judge William C. Lee and entered by the Court on [Date]. A true and correct copy of the STIPULATED FINAL JUDGMENT AND 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 [Date], at [City and State].

[DEFENDANT'S FULL NAME]

State of _____, City of _____

Subscribed and sworn to before me

this _____ day of _____ 1999.

Notary Public
My Commission Expires:
