

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**STEVEN ANTHONY BREITLING,**  
an individual doing business as ICS  
Financial Group, ICS Financial Firm,  
ICS Financial Services, ICS (A  
Financial Co.), and Integrated Credit  
Services,

Defendant.

Civil Action No. 08-494-M

**STIPULATED FINAL JUDGMENT AND  
ORDER FOR PERMANENT INJUNCTION**

Plaintiff, the Federal Trade Commission ("Commission"), filed its Complaint for Permanent Injunction and Other Equitable Relief in this matter pursuant to Sections 5(a) and 13(b) of the Federal Trade Commission Act, 15 U.S.C. §§ 45(a) and 53(b), and the Telemarketing Sales Rule, 16 C.F.R. Part 310, charging Defendant Steven Anthony Breitling, an individual doing business as ICS Financial Group, ICS Financial Firm, ICS Financial Services, ICS (A Financial Co.), and Integrated Credit Services, with unfair and deceptive acts and practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, and the Telemarketing Sales Rule, 16 C.F.R. Part 310.

**STIPULATED FINAL JUDGMENT AND  
ORDER FOR PERMANENT INJUNCTION**

Plaintiff and Defendant Steven Anthony Breitling, by and through their attorneys, have agreed to entry of this Stipulated Final Judgment and Order for Permanent Injunction (“Order”) by this Court in order to resolve all claims against Defendant in this action. Plaintiff and Defendant have consented to entry of this Order without trial or adjudication of any issue of law or fact herein and without Defendant admitting liability for any of the violations alleged in the Complaint.

Being fully advised in the premises and acting upon the joint motion of the parties to enter this Order,

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** as follows:

1. This Court has jurisdiction over the subject matter of this case and personal jurisdiction over Defendant;
2. The Complaint states a claim upon which relief may be granted against Defendant under Sections 5 and 13(b) of the FTC Act, 15 U.S.C. §§ 45 and 53(b), and the Telemarketing Sales Rule, 16 C.F.R. Part 310;
3. Venue in this district is proper under 28 U.S.C. § 1391(b) and 15 U.S.C. § 53(b);
4. The activities of Defendant are “in or affecting commerce” as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44;
5. Entry of this Order is in the public interest;
6. Defendant has read and fully understands the Complaint against him and the provisions of this Order, and he freely enters into this Order; and

7. Defendant has waived all claims under the Equal Access to Justice Act, 28 U.S.C. § 2412, and all rights to seek judicial review or otherwise challenge the validity of this Order. The parties shall each bear their own costs and attorney's fees incurred in this action.

### DEFINITIONS

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

A. **"Defendant"** means Steven Anthony Breitling, individually and doing business as ICS Financial Group, ICS Financial Firm, ICS Financial Services, ICS (A Financial Co.), and Integrated Credit Services.

B. **"Assets"** means any legal or equitable interest in, right to, or claim to, any real and personal property, including, but not limited to, "goods," "instruments," "equipment," "fixtures," "general intangibles," "inventory," "checks," "notes" (as these terms are defined in the Uniform Commercial Code), and all chattels, leaseholds, contracts, mail or other deliveries, shares of stock, lists of consumer names, accounts, credits, premises, receivables, funds, and cash, wherever located.

C. **"Assisting others"** includes, but is not limited to, providing any of the following goods or services to another entity: (1) performing customer service functions, including, but not limited to, receiving or responding to consumer complaints; (2) formulating or providing, or arranging for the formulation or provision of, any marketing material; (3) providing names of, or assisting in the generation of, potential customers; or (4) performing marketing or billing services of any kind.

**D. “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 the information can be obtained and translated, if necessary, through detection devices into reasonably usable form. A draft or non-identical copy is a separate document within the meaning of the term.

**E. “Money orders or other negotiable instruments”** means all money orders or other negotiable instruments of any kind received by Defendant, directly or indirectly, as payment on accounts arising from contracts, agreements, or understandings between Defendant and consumers related to Defendant’s marketing or offering to arrange loans or other extensions of credit.

### **ORDER**

**I. BAN ON MARKETING OR ARRANGING LOANS OR OTHER EXTENSIONS OF CREDIT**

**IT IS THEREFORE ORDERED** that Defendant, whether acting directly or through any entity, corporation, subsidiary, division, affiliate or other device, is permanently restrained and enjoined from advertising, promoting, marketing, offering to provide or arrange, or providing or arranging loans or other extensions of credit to consumers, or assisting others in advertising, promoting, marketing, offering to provide or arrange, or providing or arranging loans or other extensions of credit to consumers.

**II. INJUNCTION AGAINST MISREPRESENTATIONS**

**IT IS FURTHER ORDERED** that, in connection with the marketing or offering for sale of any product or service, Defendant and each of his agents, servants, employees, and those persons in active concert or participation with him who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any entity, corporation, subsidiary, division, affiliate, or other device, are permanently restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication, any material fact, including, but not limited to: (a) the total cost to purchase, receive, or use the products or services; (b) any material restrictions, limitations, or conditions to purchase, receive, or use the products or services; (c) any material aspect of the nature or terms of a refund, cancellation, exchange, or repurchase policy for the products or services; or (d) any material aspect of the performance, efficacy, nature, or central characteristics of the products or services.

**III. INJUNCTION AGAINST VIOLATIONS OF THE TELEMARKETING SALES RULE**

**IT IS FURTHER ORDERED** that, in connection with the marketing or offering for sale of any product or service, Defendant and each of his agents, servants, employees, and those persons in active concert or participation with him who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any entity, corporation, subsidiary, division, affiliate, or other device, are permanently restrained and enjoined from violating the provisions of the Telemarketing Sales Rule, 16 C.F.R. Part

310, as presently promulgated or as it may hereafter be amended. A copy of the Telemarketing Sales Rule, 16 C.F.R. Part 310, is attached.

**IV. PROHIBITION ON PROVIDING CUSTOMER LISTS**

**IT IS FURTHER ORDERED** that Defendant and each of his agents, servants, employees, and those persons in active concert or participation with him who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any entity, corporation, subsidiary, division, affiliate, or other device, are permanently restrained and enjoined from selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, social security number, or other identifying information of any person who purchased products or services from Defendant at any time prior to the date this Order is entered. *Provided, however,* that Defendant may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

**V. RETURN OF MONEY ORDERS AND OTHER NEGOTIABLE INSTRUMENTS**

**IT IS FURTHER ORDERED** that Defendant, whether acting directly or through any entity, corporation, subsidiary, division, affiliate, or other device, shall return to consumers all uncashed money orders or other negotiable instruments in the possession of Defendant or Defendant's counsel as of the date this Order is entered, as well as any money orders or other negotiable instruments received in the sixty (60) day period after the date of entry of this Order, in the manner described below.

**A. Timing of Return of Money Orders and Other Negotiable Instruments.**

Within ten (10) days of entry of this Order, Defendant shall return to consumers all money orders or other negotiable instruments in the possession of Defendant or his counsel at the time of entry of this Order, including, but not limited to, the twenty-five (25) money orders totaling ONE THOUSAND, EIGHT HUNDRED DOLLARS (\$1,800) currently in the possession of Defendant or his counsel. Any money order or other negotiable instrument received by Defendant in the sixty (60) day period after the entry of this Order shall be returned to the consumer within ten (10) days of the date on which the money order or other negotiable instrument is received by Defendant. Defendant shall endorse each returned money order or other negotiable instrument as payable to the consumer from whom it was received.

**B. Notices to Consumers.** Defendant shall include with each returned money order or other negotiable instrument a notice to the consumer stating:

***As a result of an agreement reached in *Federal Trade Commission v. Steven Anthony Breitling, an individual doing business as ICS Financial Group, ICS Financial Firm, ICS Financial Services, ICS (A Financial Co.), and Integrated Credit Services, CV-08-494-M, U.S. District Court for the Western District of Oklahoma, settling allegations related to the marketing or offering to arrange loans or other extensions of credit by Steven Anthony Breitling, your contract has been rescinded. The enclosed money order or other negotiable instrument has been endorsed as payable to you.****

**C. Written Notification to the Commission.** Within thirty (30) days of the date of entry of this Order, Defendant shall notify the Commission in writing that all money orders or other negotiable instruments in Defendant's possession at the date of

entry of this Order have been returned to consumers. Within seventy-five (75) days of the date of entry of this Order, Defendant shall further notify the Commission in writing of any and all additional returns of money orders or negotiable instruments pursuant to this Section. All written confirmations to the Commission required in this Subsection shall include each consumer's name and address, and the amount returned to the consumer. The written confirmations shall be sent pursuant to Subsection D of Section X, titled "Compliance Reporting."

#### **VI DISPOSAL OF SENSITIVE CONSUMER INFORMATION**

**IT IS FURTHER ORDERED** that Defendant and each of his agents, servants, employees, and those persons in active concert or participation with him who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any entity, corporation, subsidiary, division, affiliate, or other device, are permanently restrained and enjoined from failing to take reasonable measures to protect against unauthorized access to or use of sensitive consumer information when disposing of information obtained in connection with the advertising, marketing, promotion, offering for sale, or sale of any loan or other credit-related services. Reasonable measures include, but are not limited to:

A. Burning, pulverizing, or shredding of papers containing sensitive consumer information so that the information cannot practicably be read or reconstructed; and



B. Destroying or erasing electronic media containing sensitive consumer information so that the information cannot practicably be read or reconstructed.

For purposes of this Section, "sensitive consumer information shall mean (i) an individual's Social Security number; financial account number; or any other information that enables a person to access another person's account (such as credit card, debit card, checking, savings, money market, stock, commodities, share or similar account, utility bill, or mortgage loan account); or (ii) individual's name or address or phone number in combination with the individual's date of birth, driver's license number or other state identification number or a foreign country equivalent, or passport number.

## VII. MONETARY JUDGMENT

**IT IS FURTHER ORDERED** that:

A. Judgment in the amount of EIGHT HUNDRED THIRTY-FIVE THOUSAND, THREE HUNDRED TWENTY-EIGHT DOLLARS (\$835,328) is entered against Defendant as equitable monetary relief, including, but not limited to, restitution and/or disgorgement, and for paying any attendant expenses of administration of any restitution fund; *provided, however*, that upon Defendant's fulfillment of the obligations in Sections VII and VIII, titled "Monetary Judgment" and "Financial Statements," this judgment shall be suspended until further order of the Court.

B. Defendant and the third parties identified below are ordered to remit to the Commission or its designated agent, within seven (7) days of the date of this Order, the following assets totaling approximately THREE THOUSAND, TWO HUNDRED

SEVENTY-SIX DOLLARS (\$3,276) in the form of electronic funds transfers or certified or cashier's checks made payable to the Commission, or such agent as the Commission may direct:

1. First Fidelity Bank shall transfer to the Commission or its designated agent all frozen assets held in the name of Steven Anthony Breitling, including, but not limited to, the funds in the business checking account held in the name of "Steven A. Breitling DBA ICS Financial Group," and all other checking and savings accounts and certificates of deposit;
2. IBC Bank shall transfer to the Commission or its designated agent all frozen assets held in the name of Steven Anthony Breitling, including, but not limited to, checking and savings accounts and certificates of deposit; and
3. Bank of Western Oklahoma shall transfer to the Commission or its designated agent all frozen assets held in the name of Steven Anthony Breitling, including, but not limited to, checking and savings accounts and certificates of deposit.

*Provided* that to the extent any identified third party cannot comply with this Subsection without the assistance of Defendant, such party must, within three (3) business days of receiving this Order, notify Defendant and counsel for the Commission of its inability to comply. Such notification shall specify the actions by Defendant that are

necessary to comply with this Order. Defendant shall immediately complete any action necessary to facilitate the identified third party's ability to timely comply with this Subsection, and Defendant's failure to complete such action within ten (10) days shall be deemed a violation of the Order, and interest at the rate prescribed in 28 U.S.C. § 1961 shall immediately begin to accrue.

C. In addition to the frozen assets listed above, Defendant shall remit to the Commission the greater of the following amounts:

1. NINE THOUSAND, SIX HUNDRED TEN DOLLARS (\$9,610); or
2. The proceeds of the sale of the following assets, as disclosed on

Defendant's Financial Statement of Individual Defendant:

- a. Hitachi 50" LCD television;
- b. Sony 30" television;
- c. Computer;
- d. Craftsman 48" riding lawn mower;
- e. 1986 Ford F-150;
- f. 1997 Mitsubishi 3000GT; and
- g. 1998 Mitsubishi Montero Sport.

The greater of the two amounts must be remitted within sixty (60) days of entry of this Order, to the Commission or its designated agent, in the form of a wire transfer or certified or cashier's check made payable to the Commission or such agent as the Commission may direct.

D. Time is of the essence for the payments specified above. In the event that Defendant does not fulfill, or only partially fulfills, his obligations in Sections VII and VIII, titled "Monetary Judgment" and "Financial Statements," Defendant shall be

immediately liable for payment of the full judgment of EIGHT HUNDRED THIRTY-FIVE THOUSAND, THREE HUNDRED TWENTY-EIGHT DOLLARS (\$835,328), which is the entire amount of the judgment, plus interest at the rate prescribed in 28 U.S.C. § 1961.

E. All funds paid pursuant to this Order shall be deposited into a fund administered by the Commission or its agent to be used for equitable relief, including, but not limited to, restitution and any attendant expenses for the administration of such equitable relief. In the event that direct restitution to consumers is wholly or partially impracticable or funds remain after restitution 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 Defendant's practices as alleged in the Complaint. Any funds not used for such equitable relief shall be deposited to the Treasury as disgorgement. Defendant shall have no right to challenge the Commission's choice of remedies under this Section. Defendant shall have no right to contest the manner of distribution chosen by the Commission.

F. No portion of any payments under the judgment herein shall be deemed a payment of any fine, penalty, or punitive assessment.

G. Defendant relinquishes all dominion over, control of, and title to the funds paid to the fullest extent permitted by law. Defendant shall make no claim to or demand return of the funds, directly or indirectly, through counsel or otherwise.

H. Defendant agrees that the facts as alleged in the Complaint filed in this action shall be taken as true without further proof in any bankruptcy case or subsequent civil litigation pursued by the Commission to enforce its rights to any payment or money judgment pursuant to this Order, including but not limited to a nondischargeability complaint in any bankruptcy case. Defendant further stipulates and agrees that the facts alleged in the Complaint establish all elements necessary to sustain an action pursuant to, and that this Order shall have collateral estoppel effect for purposes of, Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A).

#### **VIII. FINANCIAL STATEMENTS**

**IT IS FURTHER ORDERED** that, within five (5) business days after entry of this Order, Defendant shall submit to the Commission a truthful sworn statement that shall acknowledge receipt of this Order and shall reaffirm and attest to the truth, accuracy, and completeness of the financial statements previously submitted to the Commission. The Commission's agreement to this Order and the Court's approval are expressly premised on the truthfulness, accuracy, and completeness of the financial statements and supporting documents submitted to the Commission on December 22, 2008. If, upon motion by the Commission, the Court finds that the financial statements or supporting documents of Defendant contain any material misrepresentation or fail to disclose any asset the value of which exceeds \$1,000, then the suspension of the judgment set forth in Section VII titled "Monetary Judgment" shall be vacated and the full amount shall immediately become due and payable, less any payments already made; *provided*,

*however*, that in all other respects this Order shall remain in full force and effect unless otherwise ordered by the Court; and, *provided further*, that proceedings instituted under this provision would be in addition to, and not in lieu of, any other civil or criminal remedies as may be provided by law, including any other proceedings that the Commission may initiate to enforce this Order. For purposes of this Section, Defendant waives any right to contest any of the allegations in the Complaint.

#### **IX. COMPLIANCE MONITORING**

**IT IS FURTHER ORDERED** that, for the purpose of (i) monitoring and investigating compliance with any provision of this Order, and (ii) investigating the accuracy of Defendant's financial statements upon which the Commission's agreement to this Order is expressly premised:

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

**B.** In addition, the Commission is authorized to use all other lawful means, including but not limited to:

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, 45, and 69;
2. posing as consumers and suppliers to Defendant, his employees, or any other entity managed or controlled in whole or in part by Defendant, without the necessity of identification or prior notice; and

C. 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 Order. The person interviewed may have counsel present;

*Provided, however,* that 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 obtain any documentary material, tangible things, testimony, or information relevant to unfair or deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C. § 45(a)(1)).

#### **X. COMPLIANCE REPORTING**

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

- A. For a period of four (4) years from the date of entry of this Order,
  1. Defendant shall notify the Commission of the following:

- a. Any changes in Defendant's residence, mailing addresses, and telephone numbers, within ten (10) days of the date of the change;
  - b. Any changes in Defendant's employment status (including self-employment), and any change in Defendant's ownership in any business entity, within ten (10) days of the date of the change. The notice shall include the name and address of each business that Defendant is affiliated with, employed by, creates or forms, or performs services for; a detailed description of the nature of the business; and a detailed description of Defendant's duties and responsibilities in connection with the business or employment; and
  - c. Any changes in Defendant's name or use of any aliases or fictitious names.
2. Defendant shall notify the Commission of any changes in structure of any business entity that Defendant directly or indirectly controls, or has an ownership interest in, that may affect compliance obligations arising under this Order, including, but not limited to: incorporation or other organization; a dissolution, assignment, sale, merger, or other action; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this



Order; or a change in the business name or address, at least thirty (30) days prior to the change, *provided* that, with respect to any proposed change in the business entity about which Defendant learns of less than thirty (30) days prior to the date the action is to take place, Defendant shall notify the Commission as soon as is practicable after obtaining such knowledge;

B. One hundred eighty (180) days after the date of entry of this Order, and annually thereafter for a period of four (4) years, Defendant shall provide a written report to the Commission, which is true and accurate and sworn to under penalty of perjury, setting forth in detail the manner and form in which he has complied and is complying with this Order. This report shall include, but not be limited to:

1. Defendant's then-current residence address, mailing addresses, and telephone numbers;
2. Defendant's then-current employment status (including self-employment), including the name, addresses, and telephone numbers of each business that Defendant is affiliated with, employed by, or performs services for; a detailed description of the nature of the business; and a detailed description of Defendant's duties and responsibilities in connection with the business or employment;
3. Any other changes required to be reported under Subsection A of this Section; and

4. A copy of each acknowledgment of receipt of this Order, obtained pursuant to Section XII titled "Distribution of Order."

C. Defendant shall notify the Commission of the filing of a bankruptcy petition by Defendant within fifteen (15) days of filing.

D. For the purposes of this Order, Defendant shall, unless otherwise directed by the Commission's authorized representatives, send by overnight courier all reports and notifications required by this Order to the Commission, to the following address:

Associate Director for Enforcement  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W., Room NJ-2122  
Washington, D.C. 20580  
Re: *FTC v. Steven Anthony Breitling*, Civil Action No. 08-494-M

*Provided*, that, in lieu of overnight courier, Defendant may send such reports or notifications by first-class mail, but only if Defendant contemporaneously sends an electronic version of such report or notification to the Commission at: [DEBrief@ftc.gov](mailto:DEBrief@ftc.gov).

E. For purposes of the compliance reporting and monitoring required by this Order, the Commission is authorized to communicate directly with Defendant.

#### **XI. RECORD KEEPING PROVISIONS**

**IT IS FURTHER ORDERED** that, for a period of seven (7) years from the date of entry of this Order, in connection with any business where Defendant is the majority owner of the business or directly or indirectly controls the business, Defendant and his agents, employees, officers, corporations, and those persons in active concert or participation with him who receive actual notice of this Order by personal service or

otherwise, are 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; that person's job title 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, telephone numbers, dollar amounts paid, quantity of items or services purchased, and description of items or services purchased, to the extent such information is obtained in the ordinary course of business;

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

E. Copies of all sales scripts, training materials, advertisements, direct mail solicitations, contracts sent to consumers, or other marketing materials; and

F. All records and documents necessary to demonstrate full compliance with each provision of this Order, including but not limited to, copies of acknowledgments of receipt of this Order, required by Sections XII and XIII titled "Distribution of Order" and "Acknowledgment of Receipt of Order," and all reports submitted to the Commission pursuant to Section X titled "Compliance Reporting."

## **XII. DISTRIBUTION OF ORDER**

**IT IS FURTHER ORDERED** that, for a period of four (4) years from the date of entry of this Order, Defendant shall deliver copies of this Order as directed below:

**A. Defendant as control person:** For any business entity that Defendant controls, directly or indirectly, or in which Defendant has a majority ownership interest, Defendant must deliver a copy of this Order to (1) all principals, officers, directors, and managers of that business; (2) all employees, agents, and representatives of that business who engage in conduct related to the subject matter of this Order; (3) any business entity resulting from any change in structure set forth in Subsection A.2 of Section X titled "Compliance Reporting." For current personnel, delivery shall be within five (5) days of service of this Order upon Defendant. For new personnel, delivery shall occur prior to them assuming their responsibilities. For any business entity resulting from any change in structure set forth in Subsection A.2 of Section X titled "Compliance Reporting," delivery shall be at least ten (10) days prior to the change in structure.

**B. Defendant as employee or non-control person:** For any business where Defendant is not a controlling person of the business but otherwise engages in conduct related to the subject matter of this Order, Defendant must deliver a copy of this Order to all principals and managers of such business before engaging in such conduct; and

**C.** Defendant must secure a signed and dated statement acknowledging receipt of this Order, within thirty (30) days of delivery, from all persons receiving a copy of this Order pursuant to this Section.

**XIII. ACKNOWLEDGMENT OF RECEIPT OF ORDER**

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

**XIV. LIFTING OF ASSET FREEZE**

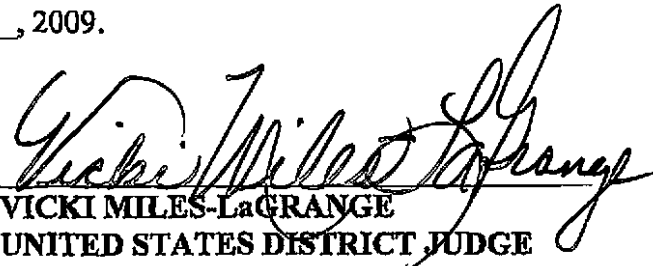
**IT IS FURTHER ORDERED** that upon entry of this Order, the freeze against assets imposed by the Stipulated Preliminary Injunction With Asset Freeze and Equitable Relief, entered in this case on May 21, 2008, shall be lifted permanently as to Defendant, including for the purposes described in Subsections B and C in Section VII, titled "Monetary Judgment."


**XV. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

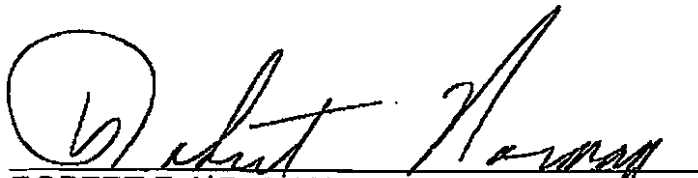
**IT IS SO ORDERED.**

DATED this 27<sup>th</sup> day of April, 2009.

  
VICKI MILES-LAGRANGE  
UNITED STATES DISTRICT JUDGE

  
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STEVEN ANTHONY BREITLING  
DEFENDANT

Date: 3.14.09

  
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Date: 3-17-09

**FOR PLAINTIFF FEDERAL TRADE COMMISSION**

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