

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 07-61152-CIV-HUCK/O’SULLIVAN

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

INTEGRITY MARKETING TEAM, INC.,  
a Florida Corporation doing  
business as Home Business System;

BYRON PETERSON, an individual doing  
business as Home Business System;  
and

MIN SUNG KIM, an individual doing business  
as Home Business System, and as an  
officer of Integrity Marketing Team, Inc.;

Defendants.

**CLOSED  
CIVIL  
CASE**

**STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT INJUNCTION  
AND OTHER EQUITABLE RELIEF AGAINST DEFENDANTS  
INTEGRITY MARKETING TEAM, INC., AND MIN SUNG KIM**

This matter comes before the Court on stipulation of Plaintiff, Federal Trade Commission (“FTC” or “Commission”), and Defendants Integrity Marketing Team, Inc., (“Defendant Integrity”) and Min Sung Kim (“Defendant Kim”). On August 14, 2007, the Commission filed a complaint for a permanent injunction and other equitable relief in this matter pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §53(b). The FTC charged Defendant Integrity and Defendant Kim (collectively “Defendants”) with engaging in deceptive acts or practices in connection with the marketing and sale of work-at-home envelope stuffing

opportunities, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45. On August 15, 2007, the Court entered a Temporary Restraining Order and asset freeze against Defendants. On September 6, 2007, the Court entered a Stipulated Preliminary Injunction against Defendants.

The Commission and Defendants hereby stipulate to the entry of, and request the Court to enter, this Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief Against Defendants Integrity Marketing Team, Inc., and Min Sung Kim ("Final Order" or "Order").

It is therefore ORDERED, ADJUDGED, AND DECREED:

**FINDINGS**

1. The Court has jurisdiction of the subject matter of this case and the parties hereto.
2. Venue in the United States District Court for the Southern District of Florida is proper under 28 U.S.C. § 1391(b) and (c) and 15 U.S.C. § 53(b).
3. The activities of Defendants are in or affecting commerce, as defined in the FTC Act, 15 U.S.C. § 44.
4. The Complaint states a claim upon which relief may be granted against Defendants.
5. Defendants waive all rights to seek judicial review or otherwise challenge or contest the validity of this Order. Defendants further waive any claim under the Equal Access to Justice Act, 28 U.S.C. §2412, *amended by* Pub. L. 104-121, 110 Stat. 847, 863-64 (1996).
6. Defendants waive and release any claim they may have against the Commission and its employees, representatives, or agents.
7. Defendants enter into this Order freely and without coercion and acknowledge

that they have read, understand, and are prepared to abide by the provisions of this Order.

8. This Order is in addition to, and not in lieu of, any other civil or criminal remedies that may be provided by law.
9. Entry of this Order is in the public interest.

#### **DEFINITIONS**

1. **“Assisting Others”** means knowingly providing any of the following goods or services to another business venture: (A) performing customer service functions, including, but not limited to, receiving or responding to consumer complaints; (B) formulating or providing, or arranging for the formulation or provision of, any marketing material; (C) providing names of, or assisting in the generation of, potential customers; (D) hiring, recruiting, or training personnel; (E) advising or acting as a consultant to others on the commencement or management of a business venture; or (F) performing marketing services of any kind.

2. **“Business Venture”** means any written or oral business arrangement, however denominated, that is covered by the Franchise Rule or the Business Opportunity Rule, or that consists of the payment of any consideration in exchange for:

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

3. **“Defendants”** means Defendants Integrity Marketing Team, Inc., and Min Sung

Kim.

4. **“Employer”** means any individual or entity for whom any Defendant performs services as an employee, consultant, or independent contractor.

5. **“Employment”** means the performance of services as an employee, consultant, or independent contractor.

4. **“Material”** means likely to affect a person’s choice of, or conduct regarding, goods or services.

5. **“Work-at-home Opportunity”** means any program, plan, product, or service represented to enable a participant or purchaser thereof to earn money exclusively or primarily by working at home.

## ORDER

### I. PROHIBITED BUSINESS ACTIVITIES

**IT IS THEREFORE ORDERED** that, in connection with the advertising, promotion, offering for sale, or sale of any goods or services, including but not limited to offers for sale of any work-at-home opportunity, Defendants, as well as their agents, employees, officers, corporations, successors, assigns, and all other persons or entities in active concert or participation with them who received actual notice of this Order by personal service, facsimile, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other entity, are hereby restrained and enjoined from making or assisting others in making, expressly or by implication, any false or misleading statement or misrepresentation of material fact, including but not limited to:

- A. That consumers are likely to earn a substantial amount of money;
- B. The amount of earnings, income, sales volume, or profits that a consumer is likely

to achieve;

C. The amount of earnings, income, sales volume, or profits that consumers have achieved in the past;

D. That consumers who participate in Defendants' envelope stuffing opportunity will be paid for each envelope they stuff;

E. The nature of any business venture offered or sold; and

F. Any material term, condition, or limitation of the transaction or about the use of any offered good or service.

## II. MONETARY JUDGMENT

**IT IS FURTHER ORDERED** that:

A. Judgment in the amount of \$1,280,612 (one million two-hundred eighty thousand six hundred twelve dollars) is hereby entered against Defendants, jointly and severally, as equitable monetary relief, in favor of the Commission; *provided*, that this judgment amount, except such amounts specified in this Section, shall be suspended upon Defendants' fulfillment of the payment obligations set forth in this Section.

B. Defendants shall pay \$114,708.43 to the FTC, by certified check or other guaranteed funds, payable to and delivered to the FTC, or by wire transfer in accordance with directions provided by the FTC, as follows:

1. Upon signing this Order, Defendants and Plaintiff will stipulate to transfer \$71,508.43 in funds in accounts at Bank of America that were frozen pursuant to the Temporary Restraining Order entered by the Court August 15, 2007, to the FTC in the form of a certified or cashier's check made payable to the FTC or by wire transfer to the FTC. Payment should be

sent to:

Federal Trade Commission  
Suite 1500  
225 Peachtree Street  
Atlanta, GA 30303

2. Within thirty (30) business days after receiving notice of the entry of this Order, Defendants shall pay to the FTC the remaining balance of \$43,200.00 in the form of a certified or cashier's check made payable to the FTC.
3. *Provided, however,* that in the event that Defendants do not fulfill, or only partially fulfill, the conditions set forth in this Section II.B: (a) the suspension of the judgment amount set forth in Section II.A shall be vacated, and the full amount of the judgment shall immediately become due, less any payments or transfers already made to the FTC, plus interest from the date of the entry of this Order pursuant to 28 U.S.C. §1961, and (b) Defendants agree that the facts as alleged in the complaint filed in this action shall be taken as true, without further proof, in any subsequent litigation filed by or on behalf of the FTC to collect any unpaid amount or otherwise enforce its rights pursuant to this Order, including a nondischargeability complaint filed in any bankruptcy case; *provided, however, further that* in the event that Defendants do not comply with any provision of this Order, including any provision set forth in this Section II, this Subsection II.B.4 does not prevent the FTC from seeking an order to show cause why all or any of them should not be held in contempt for

failure to comply with this Order provision.

C. 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 consumer redress and any attendant expenses for the administration of any redress funds. In the event that direct redress to consumers is wholly or partially impracticable or funds remain after redress is completed, the Commission may apply any remaining funds for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to the Defendants' practices alleged in the Complaint. Any funds not used for such equitable relief shall be deposited to the United States Treasury as disgorgement. Defendants shall have no right to challenge the Commission's choice of remedies or manner of distribution under this Section.

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

E. Defendants acknowledge and agree that all money paid pursuant to this Order is irrevocably paid to the Commission for purposes of settlement between Plaintiff and Defendants.

F. The Commission and Defendants acknowledge and agree that this judgment for equitable monetary relief is solely remedial in nature and is not a fine, penalty, punitive assessment, or forfeiture.

### **III. RIGHT TO REOPEN**

**IT IS FURTHER ORDERED** that:

A. The Commission's agreement to, and the Court's approval of, this Order is expressly premised upon the truthfulness, accuracy, and completeness of the financial condition of Defendants Min Sung Kim and Integrity Marketing Team, Inc., as represented in their sworn

financial statements dated August 20, 2007, as updated on March 27, 2008, and documents provided to the Commission in support thereof, all of which include material information upon which the Commission relied in negotiating and consenting to this Order.

B. If, upon motion by the Commission, the Court finds that Defendants failed to disclose any material asset, or made any other material misrepresentation or omitted material information in the above-referenced financial statements and information, the suspension of the monetary judgment shall be vacated, and the entire \$1,280,612 (one million two-hundred eighty thousand six hundred twelve dollars) shall immediately become due, less any payments or transfers already made to the FTC, plus interest from the date of the entry of this Order pursuant to 28 U.S.C. §1961.

C. Any proceedings instituted under this Paragraph III are 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 FTC may initiate to enforce this Final Order.

#### **IV. CUSTOMER LISTS**

**IT IS FURTHER ORDERED** that Defendants, and their officers, agents, servants, employees, and attorneys, and all other persons or entities in active concert or participation with them who receives actual notice of this Order by personal service, facsimile, 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, e-mail address, or other identifying information of any person who paid any money to any Defendant, at any time prior to entry of this order, in connection with the marketing and sale of Defendants' work-at-home enveloping stuffing opportunity. *Provided*, however, that Defendants may disclose such identifying information to a law enforcement agency or as required by any

law, regulation, or court order.

**V. COOPERATION WITH FTC COUNSEL**

**IT IS FURTHER ORDERED** that Defendant Kim shall, in connection with this action or any subsequent investigations related to or associated with the transactions or the occurrences that are the subject of the FTC's Complaint, cooperate in good faith with the FTC and appear at such places and times as the FTC shall reasonably request, after written notice, for interviews, conferences, pretrial discovery, review of documents, and for such other matters as may be reasonably requested by the FTC. If requested in writing by the FTC, Defendant Kim shall appear and provide truthful testimony in any trial, deposition, or other proceeding related to or associated with the transactions or the occurrences that are the subject of the Complaint, without the service of a subpoena.

**VI. COMPLIANCE MONITORING**

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

- A. Within ten (10) days of receipt of written notice from a representative of the

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Commission, Defendants Kim and Integrity each 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 such Defendant's possession or direct or indirect control to inspect the business operation;

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

1. Obtaining discovery from any person, without further leave of the Court, using the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45;
2. Posing as consumers and suppliers to Defendants, and their employees, or any entity managed or controlled in whole or in part by either Defendant, without the necessity of identification or prior notice; and

C. Defendants 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)).

**VII. 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 five (5) years from the date of entry of this Order,
  1. Defendant Kim shall notify the Commission of the following:
    - a. Any changes in residence, mailing addresses, and telephone numbers of Defendant Kim, within ten (10) days of the date of such change;
    - b. Any changes in his employment status (including self-employment) of Defendant Kim, and any change in the ownership of Defendant Kim of any business entity within ten (10) days of the date of such change. Such notice shall include the name and address of each business that Defendant Kim is affiliated with, employed by, creates or forms, or performs services for; a statement of the nature of the business; and a statement of Defendant Kim's duties and responsibilities in connection with the business or employment; and
    - c. Any changes in Defendant Kim's name or use of any aliases or fictitious names; and
  2. Defendants shall notify the Commission of any changes in corporate structure of Integrity Team Marketing, Inc., or any business entity that Defendant Kim directly or indirectly controls, or has an ownership interest

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in, that may affect compliance obligations arising under this Order, including but not limited to a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor entity; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order; the filing of a bankruptcy petition; or a change in the corporate name or address, at least thirty (30) days prior to such change, *provided* that, with respect to any proposed change in the corporation about which Defendants learn less than thirty (30) days prior to the date such action is to take place, Defendants 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, Defendant Integrity and Defendant Kim each shall provide a written report to the FTC, sworn to under penalty of perjury, setting forth in detail the manner and form in which they have complied and are complying with this Order. This report shall include, but not be limited to:

1. For Defendant Kim:
  - a. Defendant Kim's then-current residence address, mailing addresses, and telephone numbers;
  - b. Defendant Kim's then-current employment and business addresses and telephone numbers, a description of the business activities of each such employer or business, and the title and responsibilities of Defendant Kim for each such employer or business; and

c. Any other changes required to be reported under subparagraph A of this Section.

2. For all Defendants:

a. A copy of each acknowledgment of receipt of this Order, obtained pursuant to Paragraph IX below;

b. A statement describing the manner in which each Defendant has complied and is complying with the provisions set forth in Paragraphs I through V above; and

c. Any other changes required to be reported under subparagraph A of this Order.

C. Upon written request by a representative of the Commission, each Defendant shall submit additional written reports (under oath, if requested) and produce documents on fifteen (15) days' notice with respect to any conduct subject to this Order.

D. For the purposes of this Order, Defendants shall, unless otherwise directed by the Commission's authorized representatives, mail all written notifications to the Commission to:

Associate Director  
Division of Enforcement  
Federal Trade Commission  
601 New Jersey Avenue  
Washington, D.C. 20580

Re: **FTC v. Integrity Marketing Team, Inc., et al** Civil Action No. 07-61152-CIV-Huck/O'Sullivan

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

**VIII. RECORD KEEPING PROVISIONS**

**IT IS FURTHER ORDERED** that, for a period of eight (8) years from the date of entry of this Order, Defendants, in connection with those businesses where Defendant Kim is the majority owner or otherwise controls the business, and their agents, employees, officers, corporations, successors, assigns, and those persons in active concert or participation with them who receive actual notice of this Order by personal service, facsimile, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other entity, are hereby 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, phone 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, 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 Paragraph IX, and all reports submitted to the FTC pursuant to Paragraph VII of this order.

**IX. DISTRIBUTION OF ORDER**

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

A. For any business that Defendant Kim controls, directly or indirectly, or in which he has a majority ownership interest, Defendant Kim must deliver a copy of this Order to all principals, officers, directors, and managers of that business. Defendant Kim must also deliver copies of this Order to all employees, agents, and representatives of that business who engage in conduct related to the subject matter of this Order. For current personnel, delivery shall be within (5) days of service of this Order upon Defendants. For new personnel, delivery shall occur prior to them assuming their responsibilities.

B. For any business where Defendant Kim is not a controlling person of a business but otherwise engages in conduct related to the subject matter of this Order, Defendant Kim must deliver a copy of this Order to all principals and managers of such business before engaging in such conduct.

C. Defendants Kim and Integrity must secure a signed and dated statement acknowledging receipt of this Order, within thirty days of delivery, from all persons receiving a copy of this Order pursuant to this Part.

D. Defendant Integrity Marketing Team, Inc., must deliver a copy of this Order to all of its principals, officers, directors, and managers. Defendant Integrity Marketing Team, Inc.,

must also deliver copies of this Order to all of its employees, agents and representatives who engage in conduct related to the subject matter of this Order. For current personnel, delivery shall be within (5) days of service of this Order upon Defendants. For new personnel, delivery shall occur prior to them assuming their responsibilities.

**X. ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANTS**

**IT IS FURTHER ORDERED** that Defendants, 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.

**XI. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction over this matter for all purposes

**IT IS SO ORDERED**, this 20<sup>th</sup> day of May, 2008, at 10:10 A.m.

  
\_\_\_\_\_  
Paul C. Huck  
United States District Judge

STIPULATED AND AGREED TO BY:  
FOR THE DEFENDANTS

\_\_\_\_\_  
Min Sung Kim, Individually and  
as Officer of Defendant  
Integrity Marketing Team, Inc.

State of \_\_\_\_\_, City of \_\_\_\_\_

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

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

\_\_\_\_\_  
David J. Joffe, Attorney for  
Defendants Min Sung Kim and  
Integrity Marketing team, Inc.  
Florida Bar Number  
Joffe and Joffe, P.A.  
1 E. Broward Blvd.  
Suite 700  
Ft. lauderdale, FL 33301  
[davidjjoffe@aol.com](mailto:davidjjoffe@aol.com)

FOR THE PLAINTIFF

\_\_\_\_\_  
Paul K. Davis  
Special Florida Bar No. A5500847  
Barbara E. Bolton  
Special Florida Bar No. A5500848  
Federal Trade Commission  
225 Peachtree Street, Suite 1500  
Atlanta, GA 30303  
Telephone: (404) 656-1354  
Facsimile: (404) 656-1379  
E-Mail: [pdavis@ftc.gov](mailto:pdavis@ftc.gov)

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 07-61152-CIV-HUCK/O’SULLIVAN

_____	)
FEDERAL TRADE COMMISSION,	)
	)
Plaintiff,	)
	)
v.	)
	)
INTEGRITY MARKETING TEAM, INC.,	)
a Florida Corporation doing	)
business as Home Business System;	)
	)
BYRON PETERSON, an individual doing	)
business as Home Business System;	)
and	)
	)
MIN SUNG KIM, an individual doing business	)
as Home Business System, and as an	)
officer of Integrity Marketing Team, Inc.;	)
	)
Defendants.	)
_____	)

Min Sung Kim, being duly sworn, hereby states and affirms as follows:

1. My name is Min Sung Kim. My current residence address is \_\_\_\_\_  
\_\_\_\_\_ I am a citizen of the United States and am over the  
age of eighteen. I have personal knowledge of the facts set forth in this Affidavit.
2. I am a defendant in **FTC v. Integrity Marketing Team, Inc., et al** Civil Action  
No. 07-61152-CIV-Huck/O’Sullivan, (United States District Court for the Southern District of  
Florida.
3. On \_\_\_\_\_, I received a copy of the Stipulated Final  
Judgment and Order for Permanent Injunction and Other Equitable Relief Against Defendants

Integrity Marketing Team, Inc., and Min Sung Kim, which was signed by the Honorable Paul C. Huck, and entered by the Court on \_\_\_\_\_. A true and correct copy of the Order I received is appended to this Affidavit.

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

\_\_\_\_\_  
Min Sung Kim, Individually

State of \_\_\_\_\_, City of \_\_\_\_\_

Subscribed and sworn to before me  
this \_\_\_\_ day of \_\_\_\_\_, 2008.

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

\_\_\_\_\_  
acknowledging receipt of this Order.

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 07-61152-CIV-HUCK/O'SULLIVAN

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FEDERAL TRADE COMMISSION,	)
	)
	)
Plaintiff,	)
	)
v.	)
	)
INTEGRITY MARKETING TEAM, INC.,	)
a Florida Corporation doing	)
business as Home Business System;	)
	)
BYRON PETERSON, an individual doing	)
business as Home Business System;	)
and	)
	)
MIN SUNG KIM, an individual doing business	)
as Home Business System, and as an	)
officer of Integrity Marketing Team, Inc.;	)
	)
Defendants.	)
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Min Sung Kim, being duly sworn, hereby states and affirms as follows:

1. My name is Min Sung Kim. I am an officer of Integrity Marketing Team, Inc.

My current residence address is \_\_\_\_\_

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

2. I am a defendant in **FTC v. Integrity Marketing Team, Inc., et al** Civil Action No. 07-61152-CIV-Huck/O'Sullivan, (United States District Court for the Southern District of Florida.

3. On \_\_\_\_\_, I received a copy of the Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief Against Defendants Integrity Marketing Team, Inc., and Min Sung Kim, which was signed by the Honorable Paul C. Huck, and entered by the Court on \_\_\_\_\_. A true and correct copy of the Order I received is appended to this Affidavit.

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

\_\_\_\_\_  
Min Sung Kim as an officer of  
Integrity Marketing Team, Inc.

State of \_\_\_\_\_, City of \_\_\_\_\_

Subscribed and sworn to before me  
this \_\_\_\_ day of \_\_\_\_\_, 2008.

Notary Public

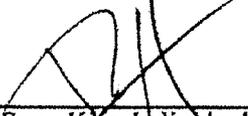
My Commission Expires:

\_\_\_\_\_

acknowledging receipt of this Order.

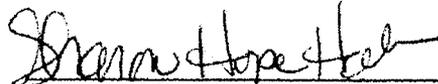
STIPULATED AND AGREED TO BY:

FOR THE DEFENDANTS

  
\_\_\_\_\_  
Min Sung Kim, Individually and  
as Officer of Defendant  
Integrity Marketing Team, Inc.

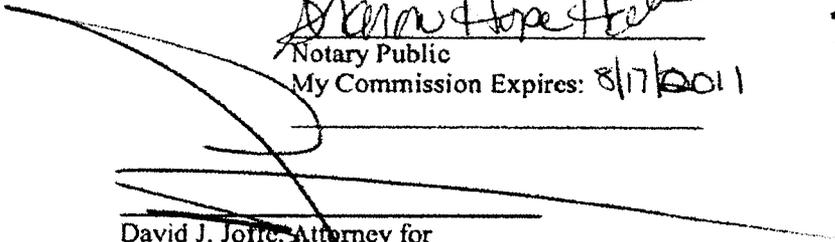
State of Florida, City of Fort Lauderdale

Subscribed and sworn to before me  
this 14th day of April, 2008.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 8/17/2011



SHARON HOPE HALLORAN  
MY COMMISSION # DD 604875  
EXPIRES: August 17, 2011  
Bonded Thru Budget Notary Services

  
\_\_\_\_\_  
David J. Joffe, Attorney for  
Defendants Min Sung Kim and  
Integrity Marketing team, Inc.  
Florida Bar Number  
Joffe and Joffe, P.A.  
1 E. Broward Blvd.  
Suite 700  
Ft. lauderdale, FL 33301  
[davidjoffe@aol.com](mailto:davidjoffe@aol.com)

FOR THE PLAINTIFF

\_\_\_\_\_  
Paul K. Davis  
Special Florida Bar No. A5500847  
Barbara E. Bolton  
Special Florida Bar No. A5500848  
Federal Trade Commission  
225 Peachtree Street, Suite 1500  
Atlanta, GA 30303  
Telephone: (404) 656-1354  
Facsimile: (404) 656-1379  
E-Mail: [pdavis@ftc.gov](mailto:pdavis@ftc.gov)