

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 12-cv-9087
	)	
v.	)	Judge John W. Darrah
	)	
CLICKBOOTH.COM, LLC, a Florida limited liability company, also d/b/a Clickbooth,	)	Magistrate Judge Jeffrey Cole
	)	
INTEGRACLICK, LLC, a Florida limited liability company, f/k/a IntegraClick, Inc.,	)	
	)	
JOHN DANIEL LEMP, individually, as an owner and officer of INTEGRACLICK, LLC, and as an officer of CLICKBOOTH.COM, LLC,	)	
	)	
Defendants.	)	
	)	

**JOINT MOTION FOR ENTRY OF  
STIPULATED FINAL JUDGMENT AND ORDER FOR  
PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission (“FTC”), along with Defendants, Clickbooth.com, LLC, IntegraClick, LLC, and John Daniel Lemp, jointly and respectfully move this Court to enter the proposed Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief as to Defendants Clickbooth.com, LLC, IntegraClick, LLC, and John Daniel Lemp (“Order”), which has been submitted to the Court separately, resolving all of the FTC’s claims in this case. In support of its motion, the parties state as follows:

1. The FTC filed its Complaint for Permanent Injunction and Other Equitable Relief on November 13, 2012. The defendants are Clickbooth.com, LLC, IntegraClick, LLC, and John Daniel Lemp (“Defendants”). The FTC and Defendants have agreed on the proposed Order,

which has been signed by all the parties and their counsel, and agree that the proposed Order should be entered by the Court. The proposed Order has been submitted to the Court.

2. The FTC represents that the proposed Order is substantially similar to stipulated final orders entered in other recent cases brought by the FTC in this District, including *FTC v. Coleadium, Inc.*, Case No. 12-cv-6964 (N.D. Ill.) (Chang, J.) (stipulated final order entered Sept. 4, 2012); *FTC v. IMM Interactive, Inc.*, Case No. 11-cv-2484 (N.D. Ill.) (Kennelly, J.) (stipulated final order entered Mar. 15, 2012); *FTC v. Ricardo Jose Labra*, Case No. 11-cv-2485 (N.D. Ill.) (Der-Yeghiayan, J.) (stipulated final order entered Jan. 11, 2012); *FTC v. Thou Lee*, Case No. 11-cv-2486 (Gottschall, J.) (stipulated final order entered Jan. 11, 2012); *FTC v. Ambervine Marketing LLC*, Case No. 11-cv-2487 (N.D. Ill.) (Bucklo, J.) (stipulated final order entered January 10, 2012); *FTC v. Central Coast Nutraceuticals, Inc.*, Case No. 10-cv-4931 (N.D. Ill.) (Norgle, J.) (stipulated final order entered Jan. 3, 2012).

WHEREFORE, the FTC and the Defendants respectfully request that the Court enter the proposed Order.

Dated: November 14, 2012

Respectfully Submitted,

DAVID SHONKA  
General Counsel

s/ Matthew H. Wernz  
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Attorneys for Defendants Clickbooth.com,  
LLC, IntegraClick, LLC, and John Daniel  
Lemp

**CERTIFICATE OF SERVICE**

I, Matthew H. Wernz, hereby certify that on November 14, 2012, I: electronically filed the foregoing **Joint Motion for Entry of Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief** with the Clerk of the Court using the CM/ECF system; submitted the proposed **Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief as to Defendants Clickbooth.com, LLC, IntegraClick, LLC, and John Daniel Lemp** (“Order”) to the Court’s courtroom deputy; and served the motion and the proposed Order by electronic mail and FedEx on the Defendants as follows:

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Respectfully Submitted,

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