

IN THE MATTER OF
OUTDOOR WORLD CORPORATION

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT

Docket 9229. Complaint, July 17, 1989—Decision, Jan. 10, 1990

This consent order prohibits, among other things, a membership campground promoter, based in Bushkill, Pa., from misrepresenting in promotional mailings that named consumers have won specified prizes when the consumers had not won the specified prizes. Also, the consent order requires respondent to retain accurate records, for three years, of advertising and promotional materials concerning prizes and gifts awarded.

Appearances

For the Commission: *Lawrence M. Hodapp* and *Eileen Harrington*.

For the respondent: *Alan Schlaifer*, Washington, D.C.

COMPLAINT

The Federal Trade Commission, having reason to believe that Outdoor World Corporation, a corporation ("respondent"), has violated certain provisions of the Federal Trade Commission Act, ("FTC Act"), 15 U.S.C. 41 *et seq.*, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. Outdoor World, Inc., is a Pennsylvania corporation with its principal office and place of business located at Route 209, Bushkill, Pennsylvania.

PAR. 2. (a) Since at least 1987, respondent has created and disseminated promotional mailings such as attached Exhibits 1-4 throughout the United States to promote the sale of resort memberships and other recreational or real property interests.

(b) Respondent's promotional mailings make numerous representations regarding prizes and gifts to be awarded to consumers who appear at the site at which resort memberships or other recreational or real property interests are sold.

PAR. 3. The acts and practices of respondent alleged in this complaint have been in or affecting commerce.

PAR. 4. In numerous instances, respondent has represented, directly or by implication, that a named consumer has won one or more specified prizes.

PAR. 5. In truth and in fact, the named consumer has not won the specified prizes. Therefore, the representations set forth in paragraph four were false and misleading.

PAR. 6. In numerous instances, respondent has represented, directly or by implication, that a consumer will receive one or more prizes for no cost.

PAR. 7. In truth and fact, consumers are unable to receive one or more prizes without paying additional costs. Therefore, the representations set forth in paragraph six were false and misleading.

PAR. 8. The acts and practices of respondent as alleged in this complaint constitute unfair and deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. 45(a).

Complaint

113 F.T.C.

EXHIBIT 1



Equity Services Group



Washington, D.C. 20007

RECEIVED MAY 04 1988

935-12

Mrs. Charles M. Keen
3200 Grove Avenue
Chester, Virginia 23831

AUDIT COMPLETED:
March 28, 1988

DETERMINATION:
Mrs. Keen has
not claimed awards

NUMBER OF CLAIMS: TWO (2)

MAXIMUM REDEMPTION VALUE: \$26,574.00 in awards to Mrs. Keen

TOP AWARD CONTINGENCY: Mrs. Keen will receive a 1988 BMW 2-Door
Sedan, and a Mitsubishi 45" Color TV

INTENTION TO CLAIM AWARDS: No appointment necessary. Must claim awards
prior to May 3, 1988. See NOTICE below.

Mrs. Keen, according to our records you were to receive an advertisement offering you the opportunity to receive two of four awards. These items included 1) 1988 BMW Car, 2) Mitsubishi Color TV, 3) Video Cassette Recorder, and 4) a set of Pierre Cardin Designer Luggage. After completion of our audit, we determined that you have not claimed your TWO (2) awards. Find attached a Certificate of Disbursement which entitles you to your TWO (2) awards. Contingent upon your award numbers, as a qualified respondent you will receive the BMW and the TV. Your opportunity to claim your awards ends on May 3, 1988.

NOTICE: For your convenience, Mrs. Keen, you have been assigned a computer selected award claim appointment time. This offer valid only April 8, 1988 through May 3, 1988. You must visit on any Monday or Friday at 1:00 PM. Closed Tuesdays, Wednesdays and Thursdays. There is no obligation to purchase anything whatsoever during your visit.

DETACH HERE

3-28-88

James R. Miller
Director

As a part of the administrative review of the investigation, the Commission has determined that the award numbers are correct.

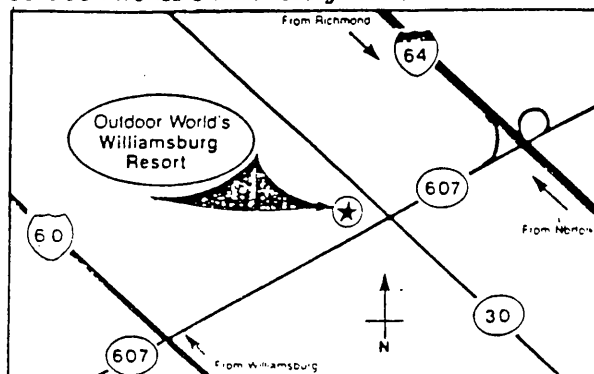
REGISTERED CERTIFICATE OF DISBURSEMENT NUMBER	935-12
VALUE OF AWARD STATED AWARD	\$26,574.00
AWARD CLAIM NUMBER	2631 AND 0037

MRS. KEEN OF CHESTER,
VIRGINIA WILL RECEIVE A NEW
BMW AUTOMOBILE, AND A NEW
MITSUBISHI 45 INCH WIDE
SCREEN COLOR TELEVISION
SYSTEM.

1

Equity Services Group
Washington, D.C. 20007
8
**CERTIFICATE OF
DISBURSEMENT**
This document has been prepared and issued by the Commission as a result of the investigation conducted by the Commission. It is a statement of the Commission's findings and conclusions. It is not a contract and does not create any legal obligation. It is subject to the Commission's review and may be modified or corrected at any time.

OUTDOOR WORLD'S Williamsburg Resort



Outdoor World's Williamsburg Resort, 4301 Rochambeau Drive, Williamsburg, Virginia

DRIVING INSTRUCTIONS TO OUTDOOR WORLD'S WILLIAMSBURG RESORT

From Richmond: Take I-64 East to Exit 54A (Croaker/Norfolk). Turn onto Rt. 607 South for 200 yards to Rt. 30 North. Take Rt. 30 North for 1/4 mile and look for the Outdoor World signs on the left.
 From Norfolk/Hampton: Take I-64 West to Junction 607/30 North Exit. Turn onto Rt. 607 for 200 yards to Rt. 30 North. Take Rt. 30 North for 1/4 mile and look for the Outdoor World signs on the left.

EASY AWARD CLAIM RULES & ELIGIBILITY CONDITIONS

There is no obligation to purchase anything whatsoever. If you and/or your spouse are employed with a consistent source of income of at least \$22,000 per year and you are at least 23 years of age, then you are eligible to participate in this offer. Members, employees, and persons previously visiting on any promotional programs are ineligible to participate in this offer. You are entitled to take advantage of only one promotional program. This offer is non-transferable and two forms of identification will be required. This entire offer is valid only on the day of actual visit. Only one promotional offer per vehicle. We ask that you travel at your own expense and present this notification letter at our Award Center before the expiration date. This offer is void where prohibited by law. As a qualified respondent, you will receive two of the awards featured in this promotion. The exact awards which you are to receive in this Grand Finalist promotion will be determined by and contingent upon your assigned Award Claim Numbers featured on the Certificate of Disbursement. Upon your visit to the facility an authorized representative will match your two Award Claim Numbers with the Official Awards List which is available only at the Williamsburg facility indicated on the map included in this offer. In order to receive your awards, we ask that you visit the Williamsburg location indicated on the map, listen to a short introductory presentation, and take a courteous tour of the facilities. If married, we ask both husband and wife be present.

THIS IS PART OF A MARKETING AND ADVERTISING PROGRAM BEING CONDUCTED FOR SEVERAL SPONSORS, WHICH INCLUDES SEVERAL AMNERT ENTERPRISE COMPANIES. PRESENTATION OF PRIZE OPTIONS WILL VARY IN DIFFERENT VERSIONS OF THIS SWEEPSTAKES OFFER. HOWEVER, THEIR VALUE WILL BE APPROXIMATELY THE SAME. EQUITY SERVICES GROUP IS A TRADE NAME OF LEAD MARKETING INC. PO BOX 10342, MCLEAN, VA 22102 AND IS ADMINISTERING THIS PROMOTIONAL PROGRAM ON THE BEHALF OF THE SPONSORS AND IS THE SOLE JUDGE FOR THE SAME. AWARD CLAIMS SUBJECT TO VERIFICATION AND VOID IF ILLEGIBLE, FORGED, ALTERED OR IRREGULAR IN ANY WAY. LIABILITY FOR MISPRINTED DATA IS LIMITED TO REPLACEMENT ONLY. DECISIONS OF JUDGES ARE FINAL. AWARDS ARE OFFERED IN CONSIDERATION FOR YOUR EXPENSE OF TIME AND TRAVEL IN VISITING THE RESORT. THIS IS A BONUS PROGRAM AND NOT A CONTEST. BECAUSE OF INVENTORY AND SECURITY REASONS, WE ISSUE REDEMPTION CERTIFICATES. SHIPPING, HANDLING, INSURANCE AND REDEMPTION FEES ARE NOT INCLUDED AND SHALL NOT EXCEED ONE HUNDRED TWENTY DOLLARS FOR THE VCR. FOR THE PURPOSES OF THIS OFFER, MAXIMUM REDEMPTION VALUE REFERS TO THE MAXIMUM VALUE OF THE TOP TWO AWARDS FEATURED IN THIS PROMOTION. THIS ENTIRE PROMOTION ENDS ON DECEMBER 31, 1988 AND ANY UNCLAIMED GIFTS WILL BE AWARDED ON OR BEFORE JANUARY 31, 1989 BY RANDOM DRAWING FROM AMONG THE PROGRAM ENTRANTS. AT PROMOTION'S END, A LIST OF MAJOR PRIZE RECIPIENTS WILL BE AVAILABLE BY SENDING A STAMPED SELF-ADDRESSED ENVELOPE TO WINNER'S LIST, DEPT. DW/AUDIT, PO BOX 10342, MCLEAN, VA 22102. MAJOR PRIZE RECIPIENTS CONSENT TO THE USE OF THEIR NAME AND OR LIKENESS FOR ADVERTISING PURPOSES WITH NO ADDITIONAL COMPENSATION. THE ORIGINAL MINIMUM PROBABILITY OF AWARDS AND THEIR STATED VALUE IN DOLLARS ARE: ITEM ONE, ONE IN ONE HUNDRED THOUSAND, VALUE TWENTY THREE THOUSAND; ITEM TWO, ONE IN ONE HUNDRED THOUSAND, VALUE THREE THOUSAND FIVE HUNDRED SEVENTY FOUR; ITEM THREE, ONE IN ONE, VALUE THREE HUNDRED NINETY NINE; ITEM FOUR, ONE IN ONE, VALUE ONE HUNDRED TWENTY FIVE. ALL RECIPIENTS ARE INVITED TO EXPLORE THE BENEFITS AND VALUE OF AN EXCLUSIVE MEMBERSHIP IN OUR RESORT WITH AMENITIES INCLUDING RECREATIONAL FACILITIES AND A PRIVATE CAMPGROUND. IN THE EVENT ONE OF THE ITEMS IS UNAVAILABLE, THE RESORT, AT ITS OPTION, RESERVES THE RIGHT TO PROVIDE A RAJNCHECK OR SUBSTITUTE AN ITEM OF EQUAL OR GREATER VALUE.

Complaint

113 F.T.C.

EXHIBIT 2

FROM James T. Clarke Finalist Awards Div.		Registered Notice: 6355	DO NOT REPRODUCE
ORIGINAL DOCUMENT			

American Family Promotions, P.O. Box 529, Glen Echo, Maryland 20812

JULY 2, 1987

RATING
STATUS, Top
PreapprovedMR. STEVE STILLMAN
251 GREEN ST
SHREWSBURY, MA 01545Ticket Nos. 005774862
005774863URGENT NOTIFICATION!

If you have received two Laser-Gram Award Claim Tickets entitling you to the top Grand Finalist Awards

**You are guaranteed to receive \$10,000.00 Cash,
plus a Mitsubishi 45 Inch Color TV**

simply by becoming a qualified respondent in our offer. Yes! You have been selected as a Grand Finalist. Our records indicate you have not responded to our previous award claim notifications. We are offering this final opportunity to claim a minimum of (2) awards stated in this offer.

****UNCLAIMED GRAND FINALIST AWARDS****

1. \$10,000.00 Cash!

2. Mitsubishi 45 Inch
Color TV!3. BX Home Movie
and Player/Recorder!

4. \$1,000.00 Cash!

Incredible, but true! These awards remain unclaimed, and we must give them away. According to our contest rules, all unclaimed awards must be distributed to previous recipients of our mail promotions. In case two or more people respond to claim the same award, duplicate awards will be distributed.

We have enclosed (2) Award Claim Tickets enabling you to receive (2) of the stated awards. When you are entitled to more than one award you will not receive two or more of the same award.

For security reasons, your exact (2) Grand Finalist Award(s) are printed in invisible ink on the Laser-Gram Award Claim Tickets. When you visit the resort indicated on the map on the back of this notification, an authorized representative will activate the invisible ink which will instantly reveal which of the stated awards you will receive.

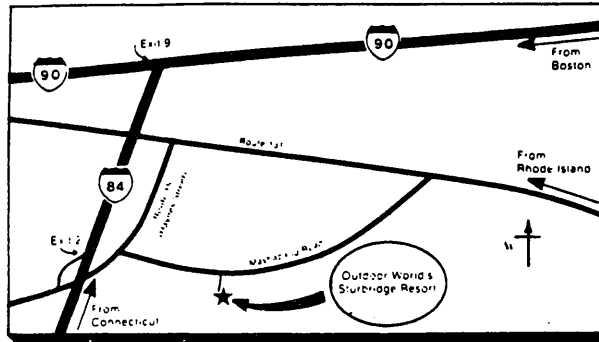
Act today! No appointment is necessary, your computer selected Award Claim Appointment Time is specified below. There is no obligation to purchase anything whatsoever during your visit.

NOTICE: AN AWARD CLAIM APPOINTMENT TIME HAS BEEN PRESELECTED FOR YOUR CONVENIENCE. TO CLAIM YOUR AWARD(S) ARRIVE AT 12:30 PM, ANY SATURDAY OR SUNDAY. THIS IS YOUR ONLY NOTICE AND THE ENTIRE OFFER EXPIRES ON JULY 28, 1987.

JTC

11

OUTDOOR WORLD'S Sturbridge Resort



Outdoor World's Sturbridge Resort, 19 Mashapaug Road, Sturbridge, Massachusetts

DRIVING INSTRUCTIONS TO OUTDOOR WORLD'S STURBRIDGE RESORT

From Metropolitan Boston: Take I-90 (Mass. Turnpike) to Exit 9. Take I-84 West to Exit 2. Turn left onto Rt. 15 (Haynes Street) and take the first right turn onto Mashapaug Road. Look for the Outdoor World sign on the right side.
From Rhode Island: Take Rt. 44 West to Rt. 12. Take Rt. 12 to Rt. 131 West through Southbridge. Make a left turn onto Rt. 15 (Haynes Street) to Mashapaug Road. Make another left turn onto Mashapaug Road and look for the Outdoor World sign on the right.

AWARD CLAIM RULES AND ELIGIBILITY CONDITIONS

There is no obligation to purchase anything whatsoever during your visit to Outdoor World's Sturbridge Resort. If you and/or your spouse are employed with a consistent source of income of at least \$20,000 per year and you are at least 23 years of age, then you are eligible to participate in this offer. Sturbridge Resort members, employees, and persons previously visiting on any promotional programs of Sturbridge Resort are ineligible to participate in this offer. You are entitled to take advantage of only one Sturbridge Resort promotional program. This offer is non-transferable and proof of identification is required. This entire offer is valid only on the day of your actual visit. Only one promotional offer per vehicle. We ask that you travel at your own expense and present this notification letter at our Award Center before the expiration date. This offer is void where prohibited by law.

The exact award(s) you are to receive in this Grand Finalist Awards promotion is printed in invisible ink on the enclosed Award Claim Tickets. When you visit Sturbridge Resort, an authorized representative will activate the invisible ink revealing the item you are entitled to receive. By meeting the award claim qualifications, you will definitely receive at least one of the four awards listed on the front of this notification. Receiving more than one ticket, can qualify you to receive multiple awards. When you are entitled to receive multiple awards, you will receive two or more awards. You will not receive two of the same award.

In order to receive your award(s), you must visit the Sturbridge Resort location on the above map. We ask that you listen to a short introductory presentation and take a courteous tour of the facilities. If married, both husband and wife must be present.

THIS IS PART OF A MARKETING AND ADVERTISING PROGRAM BEING CONDUCTED FOR SEVERAL SPONSORS WHICH INCLUDES OUTDOOR WORLD'S STURBRIDGE RESORT AND ENDS DECEMBER 31, 1987. AMERICAN FAMILY PROMOTIONS, P.O. BOX 529, GLEN ECHO, MD. 20812 IS ADMINISTERING THIS PROMOTIONAL PROGRAM ON BEHALF OF THE SPONSORS AND IS THE SOLE JUDGE FOR THE SAME. AWARD CLAIMS SUBJECT TO VERIFICATION AND VOID IF ILLEGIBLE, UNAUTHORIZED, FORGED, ALTERED OR IRREGULAR IN ANY WAY. LIABILITY FOR MISPRINTED DATA OR DEFECTIVE PROMOTIONS IS LIMITED TO REPLACEMENT ONLY. DECISIONS OF JUDGE ARE FINAL. AWARDS ARE OFFERED IN CONSIDERATION FOR YOUR EXPENSE OF TIME AND TRAVEL IN VISITING THE RESORT. THIS IS A BONUS PROGRAM AND NOT A CONTEST. THIS PROMOTION IS NO WAY AFFILIATED OR OTHERWISE INTENDED TO BE ASSOCIATED IN ANY WAY WITH AMERICAN FAMILY PUBLISHERS OR ANY AGENT THEREOF. SOME RECIPIENTS SHALL RECEIVE A GAS BARBECUE (1:1:00003) WITH A RETAIL VALUE OF EIGHTY NINE DOLLARS IN ADDITION TO ONE OR MORE OF THE AWARDS LISTED. AWARDS OF EQUAL OR GREATER VALUE MAY BE SUBSTITUTED SUBJECT TO THE AVAILABILITY FROM SUPPLIER OR MANUFACTURER. AT LEAST ONE OF EVERY AWARD WILL BE DISTRIBUTED. THE TOTAL NUMBER OF AWARDS TO BE DISTRIBUTED DEPENDS UPON THE TOTAL NUMBER OF PARTICIPANTS. THE MORE PARTICIPANTS, THE MORE AWARDS THAT WILL BE DISTRIBUTED. TAXES ARE THE RESPONSIBILITY OF THE RECIPIENT. AT PROMOTIONS END, A LIST OF MAJOR AWARD RECIPIENTS WILL BE AVAILABLE BY SENDING A STAMPED, SELF-ADDRESSED ENVELOPE TO: WINNER'S LIST, P.O. BOX 529, GLEN ECHO, MD. 20812. MAJOR AWARD RECIPIENTS CONSENT TO THE USE OF THEIR NAME AND/OR LIKENESS FOR ADVERTISING PURPOSES WITH NO ADDITIONAL COMPENSATION. THOSE RESPONDENTS WHO RECEIVE THE TELEVISION AND/OR THE HOME MOVIE PLAYER/RECORDER SHALL RECEIVE AN ENTITLEMENT CERTIFICATE ENTITLING THE BEARER TO SAID AWARDS(S). TAXES, SHIPPING, HANDLING FEES, AND CERTIFICATE PROCESSING AND REDEMPTION FEE SHALL BE ONE HUNDRED TWENTY FIVE DOLLARS FOR THE TELEVISION OR FORTY DOLLARS, NINETY-FIVE CENTS FOR THE HOME MOVIE PLAYER/RECORDER. SAID HOME MOVIE PLAYER/RECORDER SHALL BE REDEEMED AND FEE PAID BY CASHIER CHECK OR MONEY ORDER TO: OUTDOOR WORLD CORPORATION, P.O. BOX 447, BUSHKILL, PA. 18324. PLEASE ALLOW FOUR TO SIX WEEKS FOR DELIVERY. THIS ADVERTISEMENT IS BEING USED FOR THE PURPOSES OF SOLICITING CAMPGROUND MEMBERSHIP SALES. IN THE EVENT ONE OF THE ITEMS ARE UNAVAILABLE, OUTDOOR WORLD AT ITS OPTION, RESERVES THE RIGHT OF PROVIDING A RAINCHECK OR SUBSTITUTING AN ITEM OF EQUAL VALUE. THE ORIGINAL MINIMUM PROBABILITY OF AWARDS ARE: ITEM 1, 1:100003, VALUE \$10,000; ITEM 2, 1:100003, VALUE \$2,899; ITEM 3, 1:1:00003, VALUE \$199; ITEM 4, 1:100003, VALUE \$1,000.

RECEIVED
MAY 1962
00577486.2

 Your Invisible Ink Award	Award Claim Ticket This is a guaranteed award receipt when you purchase in the INVISIBLE INK campaign. The award amount you will receive is printed in Invisible Ink on this Award Claim Ticket. When you visit the location indicated, an authorized representative will activate the ink and you will be en- titled to and shall receive the item stated.
	WATERBURY

RECEIVED
MAY 1962
00577486.3

 Your Invisible Ink Award	Award Claim Ticket This is a guaranteed award receipt when you purchase in the INVISIBLE INK campaign. The award amount you will receive is printed in Invisible Ink on this Award Claim Ticket. When you visit the location indicated, an authorized representative will activate the ink and you will be en- titled to and shall receive the item stated.
	WATERBURY

I HEREBY ACKNOWLEDGE THAT I HAVE RECEIVED THE AWARD PRINTED BELOW

AWARD

DATE	SIGNATURE
------	-----------

I HEREBY ACKNOWLEDGE THAT I HAVE RECEIVED THE AWARD PRINTED BELOW

AWARD

RECEIPT'S NAME	DATE	SIGNATURE
----------------	------	-----------

OUTDOOR WORLD CORPORATION
Complaint

70

Presorted
First Class Mail
U.S. Postage Paid
Permit No. 103
Ft. Belvoir, VA

ENCLOSED DOCUMENT
REQUIRES SIGNATURE

14

AWARD NOTIFICATION

American Family Promotions
American Family 20812
Post Office Box 529
Glen Echo, Maryland

People Really do WIN!
with
American Family

—
TED MATERIAL

77

Complaint

113 F.T.C.

EXHIBIT 3

WESTERN EXPRESS		MERCHANDISE CLAIM CHECK	
EXTREMELY URGENT		NUMBER	00021 78 41178
DISPATCH DATE	DISPATCH TIME	ORIGIN	TYPE OF SERVICE
JULY 2, 1988	10:08 AM	MONROE COUNTY, PA	EXPRESS DISPATCH
RECIPIENT CODE		ORIGINATOR CODE	
951-26		OPERATOR KZZ21	
TO RECIPIENT		FROM ORIGINATOR	
MRS. ALBERT BARNES		PUBLISHER'S DIGEST	
ADDRESS		ADDRESS	
3810 P ST. N.W.		CLAIMS AWARD DIVISION	
WASHINGTON, D.C. 20007		MONROE COUNTY, PA 18324	
BILLING REFERENCE INFORMATION (Use in payments and claims in transit)			
PAYMENT			
☐ CASH ☐ BILL RECIPIENT ☒ BILL SHIPPER ☐ BILL MAJOR CREDIT CARD			
MERCHANDISE ITEM CLAIM STATEMENT			
MRS. BARNES COULD RECEIVE A 1988 LINCOLN MARK VII AND \$7,500.00, AS A PUBLISHER'S DIGEST SWEEPSTAKES WINNER, BUT ONLY IF SHE VISITS THE LOCAL CLAIM CENTER PRIOR TO JULY 26, 1988.			
CHECK DELIVERY REQUIRED			
1. ☒ Hold For Claim			
2. ☐ Deliver Weekday			
3. ☐ Deliver Saturday			
4. ☐ Restricted Article Service			
5. ☐ Constant Surveillance Service			
6. ☐ Dry Ice/Ltd.			
7. ☐ Other Special Service			
EXPIRATION DATE			
JULY 26, 1988			
Merchandise Item Number		Merchandise Item Number	
1277		0002	
Description		Description	
SILVER/BLACK		ENVELOPE ENCLOSURE	
Maximum Redemption Value		Maximum Redemption Value	
\$23,000.00		\$7,500.00	
WESTERN EXPRESS OFFICE USE ONLY			
Base Charges			
Declared Charges			
Origin Agent Charge			
State/Local Taxes			
Federal Taxes/Duties			
Other Charges			
Total Charges			
FIRST NOTICE SECOND NOTICE ☒ LAST NOTICE			

WESTERN EXPRESS

N O T I C E

TO: MRS. BARNES, TWO PRIZE WINNER

FROM: MR. DAVID FAUTS, PUBLISHER'S DIGEST

SUBJECT: MERCHANDISE CLAIM CHECK 000621 78 41178

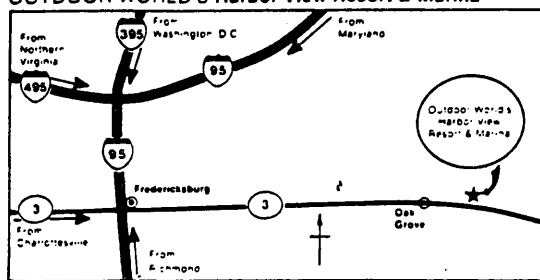
MRS. BARNES, THIS HEREBY SERVES AS YOUR LAST NOTICE TO CLAIM TWO STATED PRIZES. SINCE OUR PREVIOUS NOTICES TO YOU REMAINED UNANSWERED, WE MUST ASSUME YOU DO NOT WANT THE OPPORTUNITY TO CLAIM A 1988 LINCOLN MARK VII AND \$7,500.00. FAILURE TO CLAIM SAID ITEMS PRIOR TO JULY 26, 1988 WILL RESULT IN MANDATORY FORFEITURE OF SAID PRIZES.

OUR PREVIOUS NOTIFICATION ADVISED YOU THAT PRIZES REMAINED UNCLAIMED. THESE INCLUDED THE AUTOMOBILE, THE CASH, A REAR PROJECTION SCREEN COLOR TELEVISION, AND A DELUXE GAS FIRED BARBECUE. MR. CHARLES MCKAY OF SEVERN, MARYLAND, IS ONE OF THE LUCKY WINNERS OF THE TELEVISION, AND MRS. ALFRED FORMAN OF STOUGHTON, MASSACHUSETTS, IS ONE OF THE LUCKY WINNERS OF THE BARBECUE. WE URGE YOU TO CLAIM YOUR TWO STATED PRIZES.

MRS. BARNES, YOU ARE NOT REQUIRED TO MAKE AN APPOINTMENT. FOR YOUR CONVENIENCE, A PRIZE CLAIM APPOINTMENT TIME HAS BEEN PRESELECTED FOR YOU. SEE THE NOTICE BELOW AS TO WHEN TO CLAIM YOUR PRIZES. YOUR OPPORTUNITY TO CLAIM YOUR REMAINING TWO PRIZES EXPIRES ON JULY 26, 1988.

NOTICE: MRS. BARNES, TO CLAIM YOUR TWO PRIZES, ARRIVE AT THE HARBOR VIEW LOCATION INDICATED ON THE MAP COPIED ON THE BACK OF THIS NOTICE ANY SATURDAY OR SUNDAY AT 3:30 PM BEFORE JULY 26, 1988.

OUTDOOR WORLD'S Harbor View Resort & Marina



Outdoor World's Harbor View Resort & Marina, State Route 864, West Maryland County, Oak Grove, Virginia

DRIVING INSTRUCTIONS TO OUTDOOR WORLD'S HARBOR VIEW RESORT & MARINA

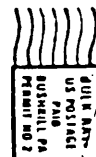
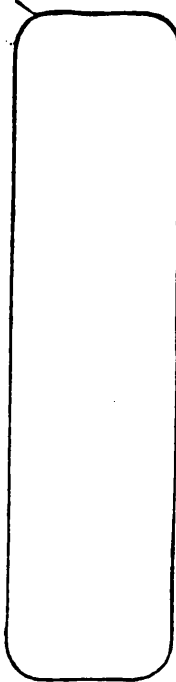
From Washington, D.C.: Take I-395/95 South to the second Fredericksburg, Va. Exit. Take Rt. 3 East through Fredericksburg and Oak Grove. Follow Outdoor World signs.
 From Maryland or No. Virginia: Take I-495/95 (Beltway) South following the Richmond signs. Take I-95 South to the second Fredericksburg Exit. Take Rt. 3 East through Fredericksburg and Oak Grove. Follow Outdoor World signs.

REDEMPTION RULES

THERE IS NO OBLIGATION TO PURCHASE ANYTHING WHATSOEVER, IF YOU AND/OR YOUR SPOUSE ARE EMPLOYED OR RETIRED WITH A CONSISTENT SOURCE OF INCOME OF AT LEAST \$22,000 PER YEAR AND YOU ARE AT LEAST 23 YEARS OF AGE THEN YOU ARE ELIGIBLE TO PARTICIPATE IN THIS OFFER. IF MARRIED, BOTH HUSBAND AND WIFE MUST BE PRESENT. WE ASK THAT YOU TAKE A COURTEOUS, SCENIC TOUR OF OUR RESORT. MEMBERS, EMPLOYEES OR PERSONS PREVIOUSLY VISITING ON ANY OTHER PROMOTION ARE NOT ELIGIBLE TO PARTICIPATE IN THIS OFFER. YOU ARE ENTITLED TO TAKE ADVANTAGE OF ONLY ONE PROMOTIONAL PROGRAM. THIS OFFER IS NON-TRANSFERABLE AND PROOF OF IDENTIFICATION IS REQUIRED. THIS ENTIRE OFFER IS VALID ONLY ON THE DAY OF YOUR ACTUAL VISIT. ONLY ONE PROMOTIONAL OFFER PER AUTO, TRANSACTION OR FAMILY. THIS OFFER IS VOID WHERE PROHIBITED BY LAW. AWARDS ARE OFFERED IN CONSIDERATION FOR YOUR EXPENSE OF TIME AND TRAVEL IN VISITING THE RESORT. BECAUSE OF INVENTORY AND SECURITY REASONS, WE ISSUE REDEMPTION CERTIFICATES FOR SOME AWARDS. SHIPPING, HANDLING, INSURANCE, AND REDEMPTION FEES ARE NOT INCLUDED AND SHALL NOT EXCEED FORTY EIGHT DOLLARS FOR THE CASIO MODEL 300 REAR PROJECTION COLOR TELEVISION. THIS PROGRAM ENDS DECEMBER 31, 1988 AND ANY UNCLAIMED GIFTS WILL BE AWARDED ON OR BEFORE JANUARY 31, 1989 BY RANDOM DRAWING FROM AMONG THE PROGRAM ENTRANTS. THIS IS PART OF A MARKETING AND ADVERTISING PROGRAM BEING CONDUCTED FOR SEVERAL SPONSORS. PRESENTATION OF PRIZE OPTIONS WILL VARY IN DIFFERENT VERSIONS OF THIS SWEEPSTAKES OFFER, HOWEVER, THEIR VALUE WILL BE APPROXIMATELY THE SAME. THE EXACT PRIZES WHICH YOU ARE TO RECEIVE IN THE GRAND PROMOTION WILL BE DETERMINED BY YOUR ASSIGNED PRIZE CLAIM NUMBERS FEATURED ON THE FRONT OF THE MERCHANDISE CLAIM CHECK. UPON COMPLETION OF YOUR TOUR AN AUTHORIZED REPRESENTATIVE WILL MATCH YOUR TWO PRIZE CLAIM NUMBERS WITH THE OFFICIAL PRIZE LIST, DETERMINING YOUR EXACT AWARDS. AWARDS AND THE CHANCE OF RECEIVING AND THE RETAIL VALUE OF EACH ITEM ARE: LINCOLN CAR 1:100,000, \$22,000; \$7,500 1:100,000, \$7,500; CASIO MODEL 300 REAR PROJECTION COLOR TELEVISION, \$9,999-100,000, \$100.00; GAS-FIRED BARBECUE, \$9,999-100,000, \$99.99. BY MEETING THE PRIZE CLAIM QUALIFICATIONS, YOU WILL DEFINITELY RECEIVE AT LEAST TWO OF THE FOUR PRIZES LISTED ON THE FRONT OF THE NOTIFICATION. PRIZE CLAIMS SUBJECT TO VERIFICATION AND VOID IF ILLEGIBLE, UNAUTHORIZED, FORGED, ALTERED OR IRREGULAR IN ANY WAY. LIABILITY FOR MISPRINTED DATA IS LIMITED TO THE REPLACEMENT OF THE PROMOTIONAL SOLICITATION ONLY. WESTERN EXPRESS AND PUBLISHER'S DIGEST, CLAIMS AWARD DIVISION, ARE REGISTERED TRADENAMES OF A.L. DEFUSCO, P.O. BOX 25479, WASHINGTON, DC 20007. ALL RECIPIENTS ARE INVITED TO EXPLORE THE BENEFITS AND VALUE OF AN EXCLUSIVE MEMBERSHIP IN OUR RESORT WITH AMENITIES INCLUDING RECREATIONAL FACILITIES AND A PRIVATE CAMPGROUND. IN THE EVENT ONE OF THE ITEMS IS UNAVAILABLE, THE RESORT, AT ITS OPTION, RESERVES THE RIGHT TO PROVIDE A RAINCHECK OR SUBSTITUTE AN ITEM OF EQUAL OR GREATER VALUE.

Complaint

113 F.T.C.

**WESTERN
EXPRESS****PLEASE OPEN
IMMEDIATELY****EXTREMELY URGENT****RESTRICTED BUSINESS USE**

\$2000.00 FINE OR FIVE YEARS IMPRISONMENT
or both for any person who interferes with or obstructs
delivery of this letter or otherwise violates § 18 United
States Code 1702 et seq.

SEE TIT. 18 SEC. 1708 U.S. CODE

Third of U.S. Mail is punishable by fines of up to
\$2000.00 or 5 years in prison or both.

Complaint

EXHIBIT 4

 189626964 		RETURN NOTICE	
Open K2221 Publisher's Digest of America Claims Adjustment Division Monroe County, PA 18324			
031-9751-47 Mrs. Robert J. Patch		MERCURY COURIER OFFICE USE ONLY	
4106 Leland Street		BASE CHARGES	
Chevy Chase, Maryland 20815		DECLARED CHARGES	
Account Number: 000000		ORIGIN AGENT CHARGE	
		STATE/LOCAL TAXES	
		FEDERAL TAXES	
		DUTIES	
		OTHER CHARGES	
		TOTAL CHARGES	

DATE SHIPPED	DATE ORDERED	SHIP VIA	ORIGIN (Location)
November 19, 1988	November 11, 1988	MERCURY	Washington, DC

DELIVERY INFORMATION		MERCHANDISE CLAIM STATEMENT	
Claim Number	Max Redemption Value	Claim Number	Max Redemption Value
205	\$23,000.00	735	\$7,500.00

1. ☒ Hold for Claim
 2. ☐ Overnight Service
 3. ☐ 2-Day Service
 4. ☐ Restricted Article
 5. ☐ Signature Service
 6. ☐ Saturday Service
 7. ☐ Weekday Service
 8. ☐ Other

PRIZE APPROVAL INFORMATION
Prize Claim Notice

EXPIRATION DATE
 December 13, 1988

November 19, 1988

Mrs. Robert J. Patch
 4106 Leland Street
 Chevy Chase, Maryland 20815

RE: Attached Return Notice
 CALL 1(800)233-4797

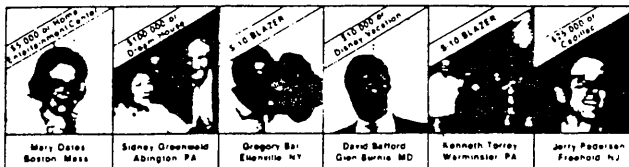
Dear Mrs. Patch;

This hereby serves as your last notice to claim two stated prizes. Since our previous notices to you remain unanswered, we must assume you do not want the opportunity to claim a 1988 Lincoln Mark VII and \$7,500.00. Failure to call 1(800)233-4797 within 72 hours of receipt of this notice to advise of your intent to claim your two stated prizes will result in the mandatory forfeiture of said prizes.

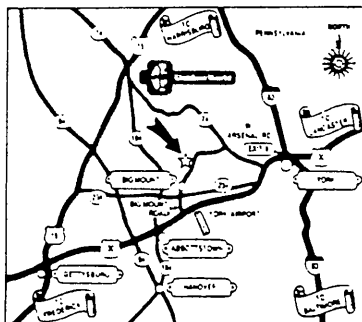
Our previous notification advised you that prizes remain unclaimed. These include the Automobile, the Cash, a Pierre Cardin 3-Piece Luggage Ensemble, and a Deluxe Gas Fired Barbecue Grill. Mr. Paul Barn of Woodside, New York is one of the lucky winners of the Luggage, and Mr. Ray Pontillo of New York is one of the lucky winners of the Barbecue. We urge you to claim your two stated prizes.

Call Toll-Free 1(800)233-4797 to advise of your intent to claim your prizes, and schedule an appointment to visit Betty'sbury Resort. Our operators are on duty Monday through Friday from 9:00 AM to 10:00 PM, and 8:00 AM to 9:00 PM, Saturday and Sunday. Remember you have 72 hours to call.

YOU MAY BE OUR NEXT BIG WINNER!
PREVIOUS WINNERS



BUT YOU CAN'T WIN IF YOU DON'T RESPOND!



GETTYSBURG
TRAVEL DIRECTIONS
FROM BALTIMORE, MARYLAND: Take I-83 north to Exit 5 West Arsenal Road. Route 30 West to Bigmount Road 1 1/2 mile West of York Airport. Turn right on Bigmount Road and follow 6 miles to Outdoor World.
FROM WASHINGTON, D.C.: Take I-270 to Frederick, MD. 15 North to Route 30 East through Abodistown then 5 1/2 miles to Bigmount Road. Turn left on Bigmount Road and follow six miles to Outdoor World.
FROM HARRISBURG: Take Route 15 South to Dillsburg then Route 74 South to Route 194 South to Abodistown. Then left on Route 30 5 1/2 miles to Bigmount Road. Turn left on Bigmount Road and follow 6 miles to Outdoor World.
FROM CHAMBERSBURG: Take Route 30 East through Abodistown then 5 1/2 miles to Bigmount Road. Turn left on Bigmount Road and follow 6 miles to Outdoor World.
FROM LANCASTER: Take Route 30 West to Bigmount Road 1 1/2 mile West of York Airport. Turn right on Bigmount Road and follow 6 miles to Outdoor World.

REDEMPTION RULES

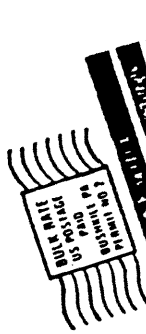
THERE IS NO OBLIGATION TO PURCHASE ANYTHING WHATSOEVER, IF YOU AND/OR YOUR SPOUSE ARE EMPLOYED OR RETIRED WITH A CONSISTENT SOURCE OF INCOME OF AT LEAST \$22,000 PER YEAR AND YOU ARE AT LEAST 23 YEARS OF AGE THEN YOU ARE ELIGIBLE TO PARTICIPATE IN THIS OFFER. IF MARRIED, BOTH HUSBAND AND WIFE MUST BE PRESENT. WE ASK THAT YOU TAKE A COURTEOUS, SCENIC TOUR OF OUR RESORT. MEMBERS, EMPLOYEES OR PERSONS PREVIOUSLY VISITING ON ANY OTHER PROMOTION WITHIN THE PAST SIX MONTHS ARE NOT ELIGIBLE TO PARTICIPATE IN THIS OFFER. YOU ARE ENTITLED TO TAKE ADVANTAGE OF ONLY ONE PROMOTIONAL PROGRAM. THIS OFFER IS NON-TRANSFERABLE AND PROOF OF IDENTIFICATION IS REQUIRED. THIS ENTIRE OFFER IS VALID ONLY ON THE DAY OF YOUR ACTUAL VISIT. ONLY ONE PROMOTIONAL OFFER PER AUTO, TRANSACTION OR FAMILY. THIS OFFER IS VOID WHERE PROHIBITED BY LAW. AWARDS ARE OFFERED IN CONSIDERATION OF YOUR EXPENSE OF TIME AND TRAVEL IN VISITING THE RESORT. THIS PROGRAM ENDS DECEMBER 31, 1984 AND ANY UNCLAIMED GIFTS WILL BE AWARDED ON OR BEFORE JANUARY 31, 1985 BY RANDOM DRAWING FROM AMONG THE PROGRAM ENTRANTS. THE EXACT PRIZES WHICH YOU ARE TO RECEIVE IN THE GRAND PROMOTION WILL BE DETERMINED BY YOUR ASSIGNED PRIZE CLAIM NUMBERS FEATURED ON THE FRONT OF THE RETURN NOTICE. AN AUTHORIZED REPRESENTATIVE WILL MATCH YOUR TWO PRIZE CLAIM NUMBERS WITH THE OFFICIAL PRIZE LIST, DETERMINING YOUR EXACT AWARDS. BY MEETING THE PRIZE CLAIM QUALIFICATIONS, YOU WILL DEFINITELY RECEIVE AT LEAST TWO OF THE FOUR PRIZES LISTED ON THE FRONT OF THE NOTIFICATION. MERCURY COURIER AND PUBLISHER'S DIGEST, CLAIMS ADJUSTMENT DIVISION, ARE REGISTERED TRADE NAMES OF A.L. DEFUSCO, P.O. BOX 25479, WASHINGTON, DC 20007. THE SPONSOR OF THIS PROMOTION IS AN EQUAL OPPORTUNITY COMPANY.

AWARDS AND THE CHANCE OF RECEIVING AND THE RETAIL VALUE OF EACH ITEM ARE:
LINCOLN CAR 1:100,000, \$23,000; \$7,500 1:100,000, \$7,500; GAS FIRED BARBECUE, 99,998:100,000, \$89.95; PIERRE CARDIN LUGGAGE, 99,998:100,000, \$125.

OUTDOOR WORLD CORPORATION

Complaint

70



INTERNET MESSAGE

RETURN NOTICE

\$2000.00 FINE OR FIVE YEARS IMPRISONMENT
or both for any person who interferes with or obstructs
delivery Code 1102 at sec.

SEE 111 18 SEC. 1108 U.S. CODE
Penalty of U.S. Mail is punishment of both
\$2000.00 or 5 years in prison or both

RESTRICTED BUSINESS USE

DECISION AND ORDER

The Commission having heretofore issued its complaint charging the respondent named in the caption hereof with violation of Section 5 of the Federal Trade Commission Act, as amended, and the respondent having been served with a copy of that complaint, together with the notice of contemplated relief; and

The respondent, its attorney, and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondent of all the jurisdictional facts set forth in the complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondent that the law has been violated as alleged in such complaint, and waivers and other provisions as required by the Commission's Rules; and

The Secretary of the Commission having thereafter partially withdrawn this matter from adjudication in accordance with Section 3.25(c) of its Rules; and

The Commission having considered the matter and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of sixty (60) days, now in further conformity with the procedure prescribed in Section 3.25(f) of its Rules, the Commission hereby makes the following jurisdictional findings and enters the following order:

1. Outdoor World Corporation is a corporation organized, existing and doing business under and by virtue of the laws of the state of Pennsylvania with its principal office and place of business located at Route 209, Bushkill, Pennsylvania.

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondent, and the proceeding is in the public interest.

ORDER

I.

It is ordered, That respondent, Outdoor World Corporation, a corporation, its successors and assigns, and its officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, do forthwith cease and desist from

representing, directly or by implication, that a consumer has won a specified prize, award, gift, bonus, premium, or any other good or service which is similarly described when in fact the consumer has not won the specified prize, gift, bonus, premium, or other good or service similarly described.

II.

It is further ordered, That respondent, its successors and assigns shall for three years after the date the representation was last made maintain and upon request make available to the Federal Trade Commission for inspection and copying accurate records of (1) all advertising, promotional or sales materials containing representations regarding prize or gift offerings and (2) all prizes or gifts awarded pursuant to such offerings.

III.

It is further ordered, That respondent shall notify the Commission at least thirty (30) days prior to any proposed change in respondent such as dissolution, assignment or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries or any other change in the corporation which may affect compliance obligations arising out of the order.

IV.

It is further ordered, That respondent shall, within sixty (60) days after service of this order, file with the Commission a report, in writing, setting forth in detail the manner and form in which it has complied with all requirements of this order.

IN THE MATTER OF
THE HENSLEY GROUP, ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT

Docket 9230. Complaint, July 17, 1989—Decision, January 10, 1990

This consent order prohibits, among other things, an Alexandria, Va. timeshare promoter and its president from representing that a consumer has won a specified prize when he or she has not won the specified prize. The order requires respondents to disclose any applicable costs immediately following reference to the prize.

Appearances

For the Commission: *Terrence J. Boyle* and *Eileen Harrington*.

For the respondents: *Frank T. Eck, Eck, Collins & Anderson*,
Richmond, VA.

COMPLAINT

The Federal Trade Commission, having reason to believe that The Hensley Group, a corporation, and H. Lloyd Hensley, individually and as an officer of said corporation ("respondents"), have violated certain provisions of the Federal Trade Commission Act, ("FTC Act"), 15 U.S.C. 41 *et seq.*, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. The Hensley Group, is a Virginia corporation with its principal office and place of business located at 4701 A Eisenhower Avenue, Alexandria, Virginia.

H. Lloyd Hensley is an officer of The Hensley Group. He formulates, directs and controls the acts and practices of The Hensley Group, including the acts and practices hereinafter set forth. His address is the same as that of The Hensley Group.

PAR. 2. (a) Since at least 1987, respondents have created and disseminated promotional mailings such as attached Exhibits 1-2 throughout the United States to promote the sale of resort memberships and other recreational or real property interests.