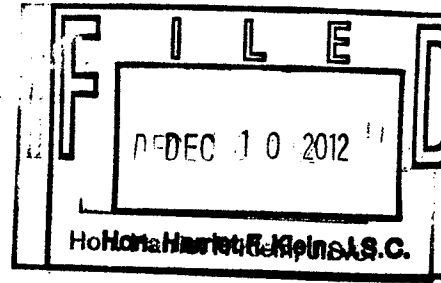


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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
ESSEX COUNTY
DOCKET NO.: ESX-C-289-12

JEFFREY S. CHIESA, Attorney General of the
State of New Jersey, and ERIC T. KANEFSKY,
Acting Director of the New Jersey Division of
Consumer Affairs

Plaintiffs,

v.

WILLIAM S. LOIRY, d/b/a UNITED STATES
LEADERSHIP FORUM, d/b/a US LEADERSHIP
FORUM, d/b/a NY/NJ RESTORATION
LEADERSHIP and d/b/a ULTIMATE EVENTS,
LLC; JANE AND JOHN DOES 1-20, individually
and as owners, officers, directors, shareholders,
founders, managers, agents, servants, employees,
representatives and/or independent contractors of
WILLIAM S. LOIRY, d/b/a UNITED STATES
LEADERSHIP FORUM, d/b/a US LEADERSHIP
FORUM, d/b/a NY/NJ RESTORATION
LEADERSHIP and d/b/a ULTIMATE EVENTS,
LLC; and XYZ CORPORATIONS 1-20,

Defendants.

Civil Action

**ORDER TO SHOW CAUSE WITH
TEMPORARY RESTRAINTS
PURSUANT TO RULE 4:52**

THIS MATTER being brought before the Court by Glenn T. Graham, Deputy Attorney General, Consumer Fraud Prosecution Section, for plaintiffs Jeffrey S. Chiesa, Attorney General of the State of New Jersey, and Eric T. Kanefsky, Acting Director of the New Jersey Division of Consumer Affairs (collectively, "Plaintiffs"), seeking relief by way of temporary ^{and preliminary} restraints, pursuant to R. 4:52, based upon facts set forth in the Verified Complaint and supporting Certification and Brief filed herewith; ^{and the court being satisfied that notice was given to defendants,} and it appearing that immediate and irreparable damage will probably result ~~before notice can be given and a hearing held~~ and for good cause shown,

It is on this 10th day of December, 2012 **ORDERED** that defendant William S. Loiry d/b/a United States Leadership Forum d/b/a US Leadership Forum d/b/a NY/NJ Restoration and d/b/a Ultimate Events, LLC ("Defendant") appear and show cause before the Superior Court, Chancery Division, General Equity Part, Essex County, Newark, New Jersey at 2:00 o'clock in the after noon or as soon thereafter as counsel can be heard, on the 30th day of January, 2013, why an Order should not be issued preliminarily enjoining and restraining Defendant from:

- A. Engaging in, continuing to engage in, or doing any acts or practices in violation of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-1 et seq. ("CFA"), and/or the Regulations Governing General Advertising, N.J.A.C. 13:45A-9.1 et seq. ("Advertising Regulations"), including, but not limited to, the acts and practices alleged in the Verified Complaint;
- B. Engaging in the advertisement, offering for sale and sale of admission to the "Superstorm Sandy Reconstruction Summit", currently scheduled for December 17, 2012 in Trenton, New Jersey ("Reconstruction Summit"), whether through his Internet website, http://www.sandyreconstruction.org ("Sandy Reconstruction Website") or through any other Internet website, e-mails, direct mailings and/or publications, ~~in the event Defendant fails to provide the information and documents and otherwise comply with subparts A through E on page 4 herein;~~
- C. Removing, selling, encumbering, transferring or engaging in any act of disposition of any assets of the Defendant that relate to the subject matter of the

Verified Complaint including, but not limited to, any money paid by any person for the Reconstruction Summit;

- D. Destroying, concealing, altering, transferring, disposing or removing in any manner, directly or indirectly, any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a), in his possession, subject to his control or available to him, that directly or indirectly relate to the advertisement, offering for sale and/or sale of the Reconstruction Summit; and
- E. Failing to make and/or keep any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a) that directly or indirectly relate to the advertisement, offering for sale and/or sale of the Reconstruction Summit.

AND IT IS FURTHER ORDERED that pending the return date herein, Defendants are *and immediately* temporarily/enjoined and restrained from:

- A. Engaging in, continuing to engage in, or doing any acts or practices in violation of the CFA, N.J.S.A. 56:8-1 et seq., and/or the Advertising Regulations, N.J.A.C. 13:45A-9.1 et seq., including, but not limited to, the acts and practices alleged in the Verified Complaint;
- B. Engaging in the advertisement, offering for sale, ~~and~~ *and conduct of* sale of the Reconstruction Summit, whether through the Sandy Reconstruction Website or through any other Internet website, e-mails, direct mailings and/or publications; *
- C. Removing, selling, encumbering, transferring or engaging in any act of disposition of any assets of the Defendant that relate to the subject matter of the Verified Complaint including, but not limited to, any money paid by any person for the Reconstruction Summit;
- D. Destroying, concealing, altering, transferring, disposing or removing in any manner, directly or indirectly, any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a), in his possession, subject to his control or available to him, that directly or indirectly relate to the advertisement, offering for sale and/or sale of the Reconstruction Summit; and
- E. Failing to make and/or keep any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a) that directly or indirectly relate to the advertisement, offering for sale and/or sale of the Reconstruction Summit.

** Within forty-eight (48) hours of receipt of this Order, defendants shall notify the public, exhibitors, and confirmed attendees of the cancellation of the Summit as set forth in Mr. Lorry's December 10, 2012 letter to the court.*

AND IT IS FURTHER ORDERED that:

- A. Within three (3) days of being served with this Order, Defendant shall identify, in writing, by name, address and telephone number, all Federal, State of New Jersey and local government officials confirmed to speak at the Reconstruction Summit and shall provide a detailed description of the topic that each speaker will be presenting;
- B. Within three (3) days of being served with this Order, Defendant shall identify, in writing, by name, address and telephone number, if available, all persons who have paid for admission to the Reconstruction Summit and shall provide copies of all documents concerning such sale;
- C. Within twenty-four (24) hours of receiving a copy of this Order, Defendant shall arrange for the following notice to be placed on the Sandy Reconstruction Website, "THE SUPERSTORM SANDY RECONSTRUCTION SUMMIT IS NOT AFFILIATED IN ANY MANNER WITH, OR SPONSORED BY, ANY FEDERAL, NEW JERSEY STATE OR LOCAL GOVERNMENT DEPARTMENT, AGENCY OR OFFICIAL.";
- D. Within twenty-four (24) hours of being served with this Order, Defendant shall arrange for an e-mail to be sent to all persons who purchased admission to, or have been invited to speak at, the Reconstruction Summit indicating that Defendant and the Reconstruction Summit, are in no way affiliated with, or sponsored by, any Federal, State or local government department, agency or official; and
- E. Within twenty-four (24) hours of being served with this Order, Defendant shall arrange for an e-mail to be sent to all persons who purchased admission to, or have been invited to attend or speak at, the Reconstruction Summit that includes an identification of all confirmed speakers, including their business title and detailed description of their presentation topic. Such information shall also be placed on the Sandy Reconstruction Website within twenty-four (24) hours of being served with this Order.

AND IT IS FURTHER ORDERED that:

1. The Defendant may move to dissolve or modify the temporary restraints herein contained on two (2) days' notice to the Plaintiffs' attorney.
2. A copy of this Order to Show Cause, Verified Complaint, Brief and supporting Certification submitted in support of this application shall be served upon the Defendant

personally (or by other means) within 3 days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

3. The Plaintiffs must file with the Court their proof of service of the pleadings on the Defendants no later than 3 days before the return date.

4. Defendant shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief and proof of service by January 22, 2013, 2012. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. You must send a copy of your opposition papers directly to Judge Harriet F. Klein, JSC, whose address is Superior Court of New Jersey, Chancery Division, General Equity Part, Essex County, Wilentz Justice Complex, 212 Washington Street, ^{8th Floor,} Newark, New Jersey 07102. You must also send a copy of your opposition papers to Plaintiffs' attorney whose name and address appears above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of if any, \$_____ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief Plaintiffs are seeking.

5. Plaintiffs may file and serve any written reply to the Defendant's Order to Show Cause opposition by January 25, 2013. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the Chambers of Judge Klein.

6. If Defendants do not file and serve opposition to this Order to Show Cause, their application will be decided on the papers on the return date and relief may be granted by default, provided that Plaintiffs file a proof of service and a proposed form of Order at least three (3) days prior to the return date.

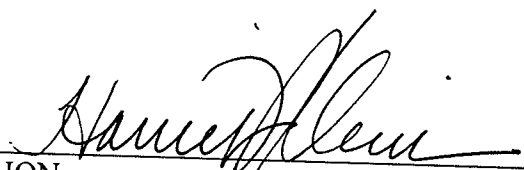
7. If Plaintiffs have not already done so, a proposed form of Order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court no later than three (3) days before the return date.

8. Defendants take notice that the Plaintiffs have filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this Complaint, you, or your attorney, must file a written Answer to the Complaint and proof of service within thirty-five (35) days from the date of service of this Order to Show Cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$ 135 filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to Plaintiffs' attorney whose name and address appear above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the Order to Show Cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief Plaintiffs demand.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of the Legal Services offices in New Jersey is provided. If you do not have an attorney and are both eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

10. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and parties are advised to the contrary no later than 3 days before the return date.


HON. HARRIET F. KLEN, J.S.C.