




1 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint  
2 alleges:

3 1. The FTC brings this action under Sections 13(b) and 19 of the  
4 Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 53(b) and 57b,  
5 and the Telemarketing and Consumer Fraud and Abuse Prevention Act  
6 (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108, to obtain temporary,  
7 preliminary, and permanent injunctive relief, rescission or reformation of  
8 contracts, restitution, the refund of monies paid, disgorgement of ill-gotten  
9 monies, and other equitable relief for Defendants’ acts or practices in  
10 violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and in violation  
11 of the FTC’s Telemarketing Sales Rule (“TSR”), 16 C.F.R. Part 310.  
12

13 **JURISDICTION AND VENUE**

14 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
15











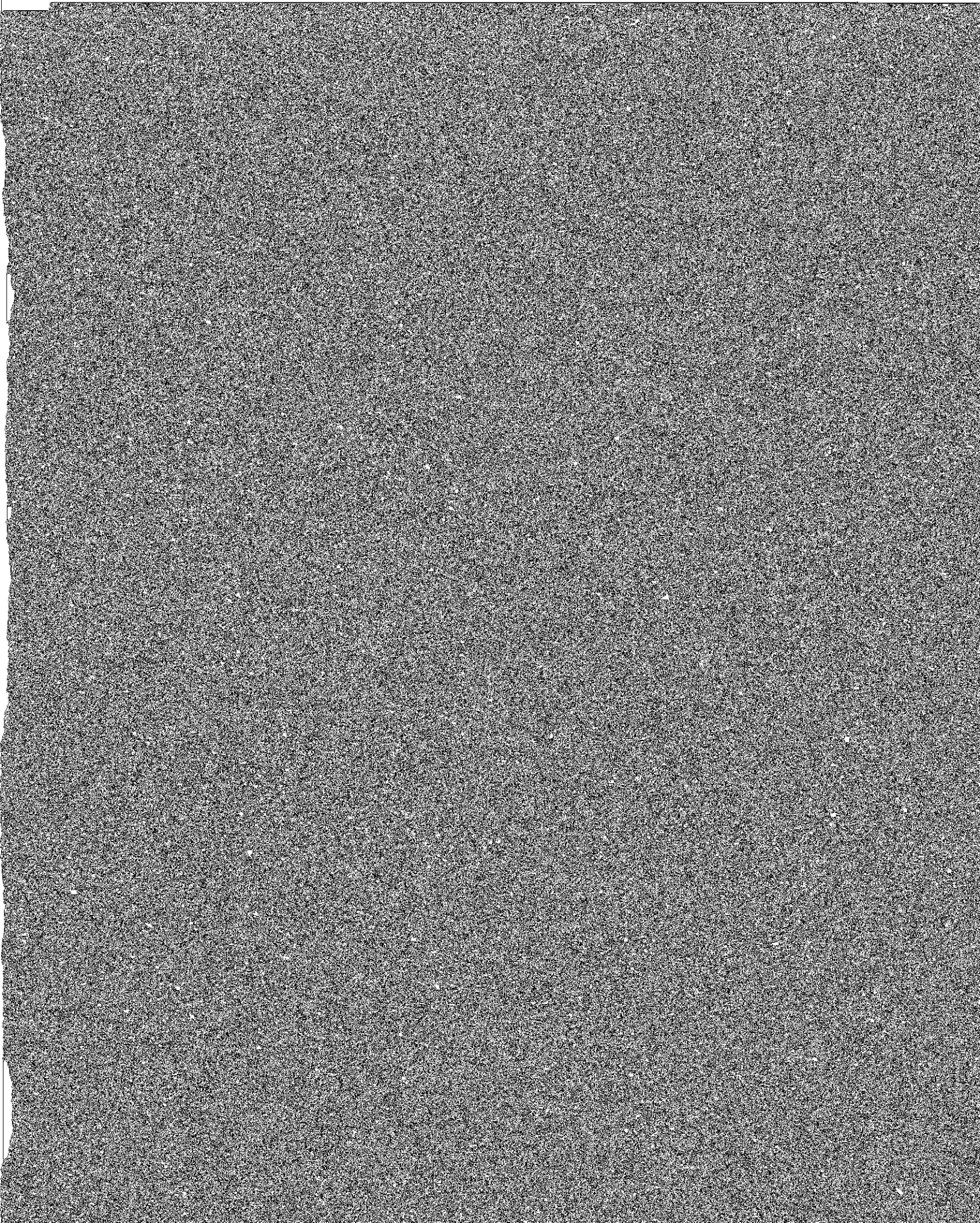
























1 D. Award Plaintiff the costs of bringing this action, as well as such  
2 other and additional relief as the Court may determine to be just and proper.