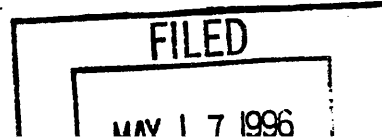


STEPHEN CALKINS
General Counsel

DAVID C. FIX
PETER W. LAMBERTON
MICHELLE CHUA
Federal Trade Commission
6th St. & Pennsylvania Ave., N.W.
Washington, D.C. 20580
(202) 326-3248 (voice)
(202) 326-2050 (facsimile)

DENNIS E. SZYBALA
VA Bar No. 22785
Office of the United States Attorney



other equitable relief including rescission, restitution and

disgorgement, against defendant, subject to the provisions of

the FTC Act, 15 U.S.C. § 45(a), and Section 310.3(a)(2)(vi) the
FTC's Telemarketing Sales Rule, 16 C.F.R. § 310.3(a)(2)(vi).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over
plaintiff's claim pursuant to 28 U.S.C. §§ 1331, 1337(a) and

1345, and 15 U.S.C. §§ 45(a), 53(b) and 57b.

3. Venue in this District is proper under 28 U.S.C.
§ 1391(b) and (c) and 15 U.S.C. § 53(b).

PLAINTIFF

4. Plaintiff FTC is an independent agency of the United
States Government created by statute. 15 U.S.C. § 45(a), et seq.
The Commission is charged, inter alia, with enforcement of
Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits
- unfair or deceptive acts or practices in or affecting commerce

Eastern District of Virginia with offices located at Central

is engaged in the sale of research, patenting and invention

promotion services to individual inventors located throughout the United States.

6. Defendant Kenneth Rogers is a "Director of Operations" of Global. Individually, or in active concert or participation with others, he formulates, directs, controls, and participates

8. Defendants have solicited the sale of patent and invention promotion services through the use of, among other things, advertisements on national television, correspondence and contracts sent through the United States mail, and telephone sales presentations.

9. Defendants' course of trade is in or affecting commerce, within the meaning of Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS' VIOLATION OF SECTION FIVE OF THE FTC ACT

provides that "unfair or deceptive acts or practices in or affecting commerce are hereby declared unlawful."

11. Misrepresentations of material facts constitute unfair or deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

12. As set forth below in connection with the sale of

patent and invention promotion services, defendants have violated

customer will achieve financial gain as a result of Global's services is extraordinarily low, if not nonexistent.

15. The misrepresentation set forth above in Paragraphs 13-

by Section 5(a) of the FTC Act, 15 U.S.C. § 45(a)

THE TELEMARKETING SALES RULE

16. On August 16, 1995, the Commission promulgated the

Telemarketing Sales Rule, 16 C.F.R. Part 310, with a Statement of Basis and Purpose, 60 Fed. Reg. 43842 (August 23, 1995), pursuant

19. Pursuant to Section 3(c) of the Telemarketing Act, 15

report and patent and/or product promotion agreement. For the reasons set forth above, defendants' customers have suffered and

THIS COURT'S POWER TO GRANT RELIEF

24. Sections 13(b) and 19 of the FTC Act, 15 U.S.C. § 53(b) and 57b, and Section 6(b) of the Telemarketing Act, 15 U.S.C. § 6105(b), empower this Court to issue a permanent injunction against defendants for violations of the FTC Act, and to issue such other relief as the Court may deem appropriate to halt and redress violations of the Telemarketing Sales Rule and the FTC Act.

25. Defendants' violations of Section 5(a) of the FTC Act and the Telemarketing Sales Rule are continuing and will continue unless enjoined by order of the Court.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs pray that the Court will grant the relief requested in the prayer for relief.

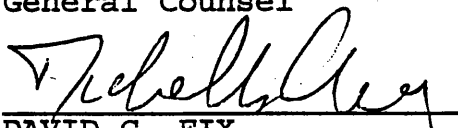
violations of the Telemarketing Sales Rule and the FTC Act,
including, but not limited to, rescission of contracts,
~~restoration of the refund of monies paid and the disgorgement of~~

(4) Award plaintiff the costs of bringing this action, as well as such other and additional equitable relief as the Court may determine to be just and proper, including, but not limited to, a temporary restraining order and an order freezing each defendant's assets.

DATED: May 16, 1996

Respectfully submitted,

STEPHEN CALKINS
General Counsel


DAVID C. FIX
PETER W. LAMBERTON
MICHAEL J. QUINN