

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

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In the Matter of )  
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RANDOLF D. ALBERTSON, ) DOCKET NO. C-3670  
individually and doing business )  
as WOLVERINE CAPITAL )  
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 )  
 )

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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Randolph D. Albertson, individually and doing business as Wolverine Capital ("respondent"), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

**PARAGRAPH ONE:** Respondent Randolph D. Albertson is an individual doing business as Wolverine Capital. His principal office or place of business is located at 1039 Gun River Drive, Plainwell, Michigan 49080.

**PARAGRAPH TWO:** Respondent is engaged in the advertising, promotion, offering for sale, sale, and distribution of a cash grant assistance program to the public.

**PARAGRAPH THREE:** The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

**PARAGRAPH FOUR:** Respondent has disseminated or has caused to be disseminated

our program. Most of our clients are approved for cash grants.

**PARAGRAPH FIVE:** Through the use of the statements contained in the advertisements referred to in PARAGRAPH FOUR, including but not necessarily limited to the advertisement attached as Exhibit 1, respondent has represented, directly or by implication, that he is able to obtain cash grants for most of his clients.

**PARAGRAPH SIX:** In truth and in fact, respondent is not able to obtain cash grants for most of his clients. Therefore, the representation set forth in PARAGRAPH FIVE was, and is, false and misleading.

**PARAGRAPH SEVEN:** Through the use of the statements contained in the advertisements referred to in PARAGRAPH FOUR, including but not necessarily limited to the advertisement attached as Exhibit 1, respondent has represented, directly or by implication, that at the time he made the representation set forth in PARAGRAPH FIVE, respondent possessed and relied upon a reasonable basis that substantiated such representation.

**PARAGRAPH EIGHT:** In truth and in fact, at the time he made the representation set forth in PARAGRAPH FIVE, respondent did not possess and rely upon a reasonable basis that substantiated such representation. Therefore, the representation set forth in PARAGRAPH SEVEN was, and is, false and misleading.

**PARAGRAPH NINE:** The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this 12th day of June, 1996, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

**SEAL:**