

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**PRECISION COMMUNICATIONS
ADMINISTRATION, INC.,**

A Florida corporation; and

**JEFFREY BLAYZ, a/k/a John Blammy,
John Jeff Sutton, Jeff Gagliano,
and John Colburn, individually, and
as an officer and director of
PRECISION COMMUNICATIONS
ADMINISTRATION, INC.,**

Defendants.

Docket No.

PLAINTIFF FEDERAL TRADE COMMISSION'S COMPLAINT FOR

1. The Commission brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain preliminary and permanent injunctive relief, rescission of contracts, restitution, disgorgement, and other equitable relief to redress consumers for the injury resulting from defendants' deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C.

5. Defendant Precision Communications Administration, Inc. (“Precision”), is a Florida corporation with its principal place of business at 3842 Curry Ford Road, Orlando, Florida, 32806. Precision promotes and sells pay-per-call business ventures to consumers, and additionally sells advertising for those and other pay-per-call services. Precision transacts business in the Middle District of Florida.

6. Defendant Jeffrey Blayz a/k/a John Blammy, John Jeff Sutton, Jeff Gagliano, and John Colburn (“Blayz”), is an officer, director and principal owner of

8. Since at least January 1996, defendants have marketed and sold pay-per-call (900-number) business ventures to consumers throughout the United States. Defendants' business venture includes advertising packages for pay-per-call telephone lines, with the pay-per-call lines thrown in for free -- or for a nominal amount -- and other services necessary to operate the lines. The pay-per-call lines include "psychic lines,"

business venture purchasers to spend what they can on advertising, explaining that their profits will be directly related to their advertising efforts.

11. Defendants also promise to provide its purchasers with additional services, such as sending them weekly call count reports that list the activity on their pay-per-call lines, and sending them proof of advertising placed on the purchasers' behalf.

VIOLATIONS OF SECTION 5 OF THE FTC ACT

15. Therefore, defendants' representations regarding purchasers' level of earnings, as set forth in Paragraph 13, were and are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C.

- b. Send business venture purchasers weekly call counts reports, which reflect the purchasers' pay-per-call activity; or**
- c. Send business venture purchasers proof of the advertising placed on the purchasers' behalf.**

18. Therefore, defendants' representations regarding distribution of revenues to their business venture purchasers, distribution of weekly call count reports, and proof of advertising as set forth in Paragraph 16, were and are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

19. Consumers in many areas of the United States have suffered substantial monetary loss as a result of defendants' unlawful acts or practices. Absent injunctive relief by this Court, defendants are likely to continue to injure consumers and harm the public interest.

THIS COURT

21. This Court, in the exercise of its equitable jurisdiction, may award other ancillary relief to remedy injury caused by defendants' law violations.

PRAYER FOR RELIEF

WHEREFORE, plaintiff requests that this Court, as authorized by Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and pursuant to its own equitable powers:

1. Award plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief;

2. Permanently enjoin defendants from violating the FTC Act;

3. Award such relief as this Court finds necessary to redress injury to consumers resulting from defendants' violations of the FTC Act, including but not limited to, rescission of contracts, the refund of monies paid, and the disgorgement of ill-gotten monies; and

4. Award plaintiff the costs of bringing this action, as well as such other and additional relief as this Court may determine to be just and proper.

Respectfully submitted,

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