DEBRA A. VALENTINE
General Counsel

STEVEN W. BALS'P1ER
BRENDA W. DOUBFUVA
LNSSA L. BUNGO
MICWEeNU[EGR0M i
Federal Trade Commission
Eaton Center
11 11 Superior Avenue, Suite 200
Cleveland, OM 44 1 14
(216) 263-3455

ALBERT W. SCHOLLAERT

Office of the United States Attorney
633 United States Post Office & Courthouse

,. Pittsburgh, PA 15219 &
i (412) 644-3 500
a

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE CQMMISSION,

)
CIVIL ACTION NO. 97-1278

1
PlaintiE, GARY E. LANCASmR
*

v.

)
1

United States District Judge

*

* DATVISON& ASSOCIAES, DW., a corporation,
GEORGE M. DAVISON El,individually,

1
1

A.MKrJDED COMPLAINT FOR INJUNCTION

1

Plaintiff, the Federal Trade Commission ("Commission" j, by its undersigned attorneys, alleges as follows: the

6. Davison & Associates offers for sale research reports, the processing of patents,
and services related to attracting potential licensees, marketers, and

corporation with a business address in the Western District of Pennsylvania of 521 Eighth Street, Oakmont, Pennsylvania. MSSI transacts or has transacted business in the Western District of Pennsylvania.
12. Defendants Davison & Associates and MSSI share oilice space and employees,
and act in concert to carry out the acts and practices complained of herein. They constitute a

common

monies;
4. Award such relief against the relief defendant that the court finds necessary to
protect and return hnds and other property that were derived from defendants' violations of the
, FTC Act, including an asset freeze and an order to disgorge all ill-gotten profits or proceeds that
they have received as a result of the acts and practices complained of herein, and an order
imposing a constructive trust upon such profits and proceeds; and
4. Award plaintiffthe cost of bringing this action, as well as such other and additional
equitable relief as the Court may determine to be just and proper.

DATED: 3/Zd /9s/ RespectfUlly submitted,12.375 04aTd�(well 7)Tj�2.50to

d r e � 0 T c 1 . 0 0 9 0 2 5 T c 0 as