business opportunities to consumers nationwide, in violation of Section 5 of the FTC Act, 15



4. "Defendant" means Defendant Jack G. Schwartz, any officer, director, employee,

Cranet and his successors essions officers asserts services on four second all

Defendant, or has held, controlled or maintained custody of any such asset of Defendant which.

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EXPEDITED DISCOVERY VI.

THE PARTICULAR CODENTED 12-42-2

and see the second

1910 (A.V.)

failing to provide any potential franchisee with an earnings claim

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- document when any earnings claim is made, as required by the Franchise
 Rule, 16 C.F.R. § 436.1(b)-(e); and
- failing to disclose, in immediate conjunction with any earnings claim, the material basis for the claim (or the lack of such basis) and a warning that the earnings claim is only an estimate, as required by the Franchise Rule, 16 C.F.R. § 436.1(e)(3)-(4).