

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

FILED BY

02 JUN 12

and the FTC's Trade Regulation Rule entitled "Disclosure Requirements and Prohibitions

[REDACTED]

6. Defendant Alfredo Susi is the President and a shareholder of ARD. At all times

[REDACTED]

substantial course of trade in the offering for sale and sale of audio cassette and compact disc display rack business ventures, in or affecting commerce, as "commerce" is defined in Section 4

SEC. 4. 15 U.S.C. § 44



No selling, Easy, Fast, and Fun For The Whole Family. And best of all,
an all CASH business! Closing Out Areas Quickly! Only a specific

depending on the number of display racks and amount of stock purchased. ARD will provide

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

29 Neither the defendants nor their representatives have a reasonable basis for the

[REDACTED]

company and fails to describe his business experience, or fails to describe MacArthur's
bankruptcy history.

taxpayers who purchase the defendants' business ventures are likely to earn substantial income

Act, 15 U.S.C. § 45(a).

COUNT V

Misrepresentations Regarding Placement of Display Racks

48. Paragraphs 1 through 31 are incorporated herein by reference.

49. In numerous instances in the course of offering for sale and selling their business

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

alia: (1) lacking a reasonable basis for each claim at the times it is made; (2) failing to disclose, in immediate conjunction with each earnings claim, and in a clear and conspicuous manner, that

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. Award plaintiff the costs of bringing this action, as well as such other and

such relief as the Court may determine to be just and proper