

RECEIVED

MAY 28 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEDERAL TRADE COMMISSION)
_____)

v.)

Civil Action No.)

EFFICIENT TELESales SERVICES INC. also d/b/a)

0000)

JURISDICTION AND VENUE

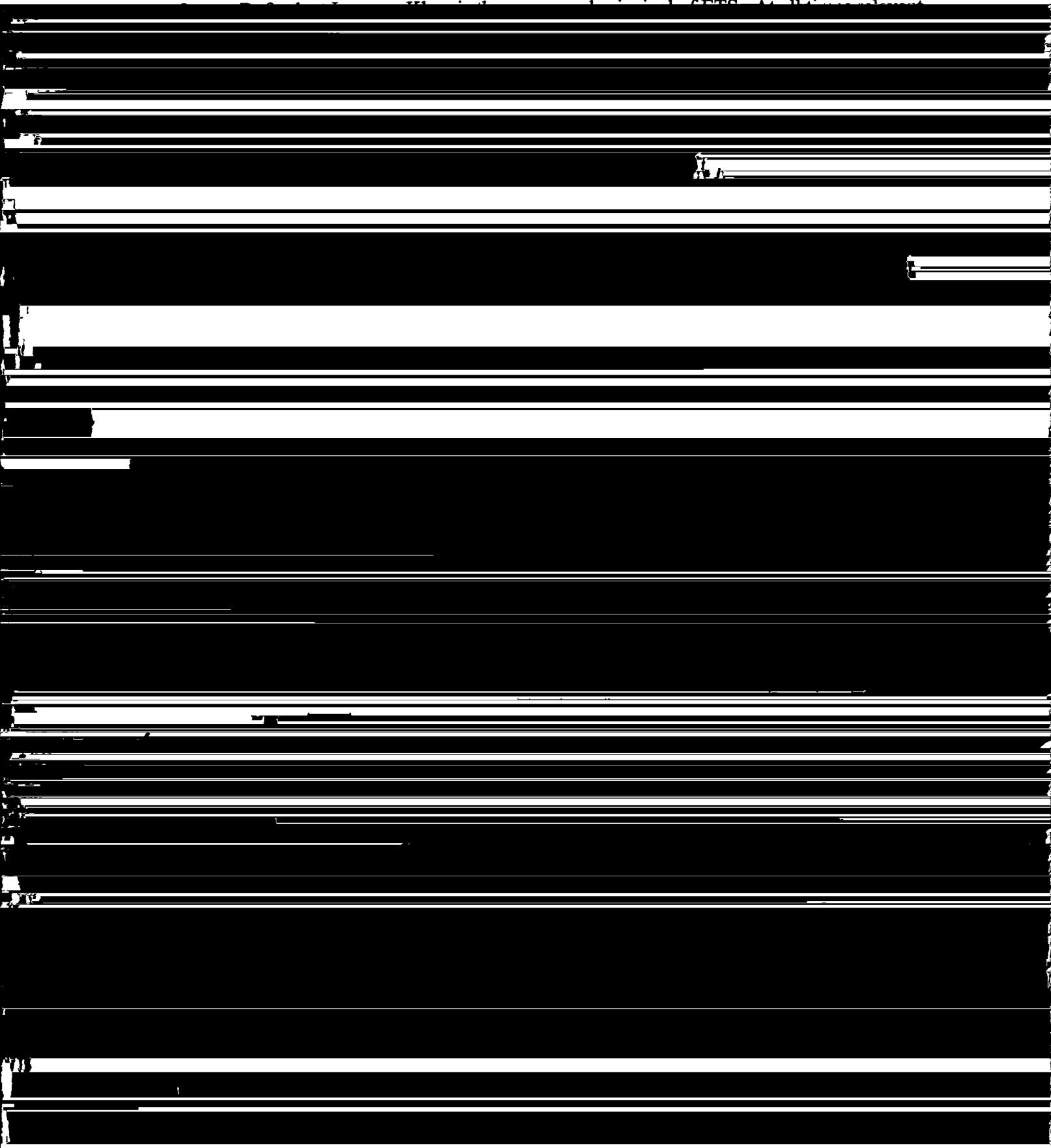
1. This Court has subject matter jurisdiction pursuant to 15 U.S.C. §§ 45(a), 53(b), 57b, 6102(c), and 6105(b), and 28 U.S.C. §§ 1331, 1337(a), and 1345.

2. Venue in the United States District Court for the Northern District of Illinois is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b), (c), and (d).

PLAINTIFF

3. Plaintiff the Federal Trade Commission is an independent agency of the United

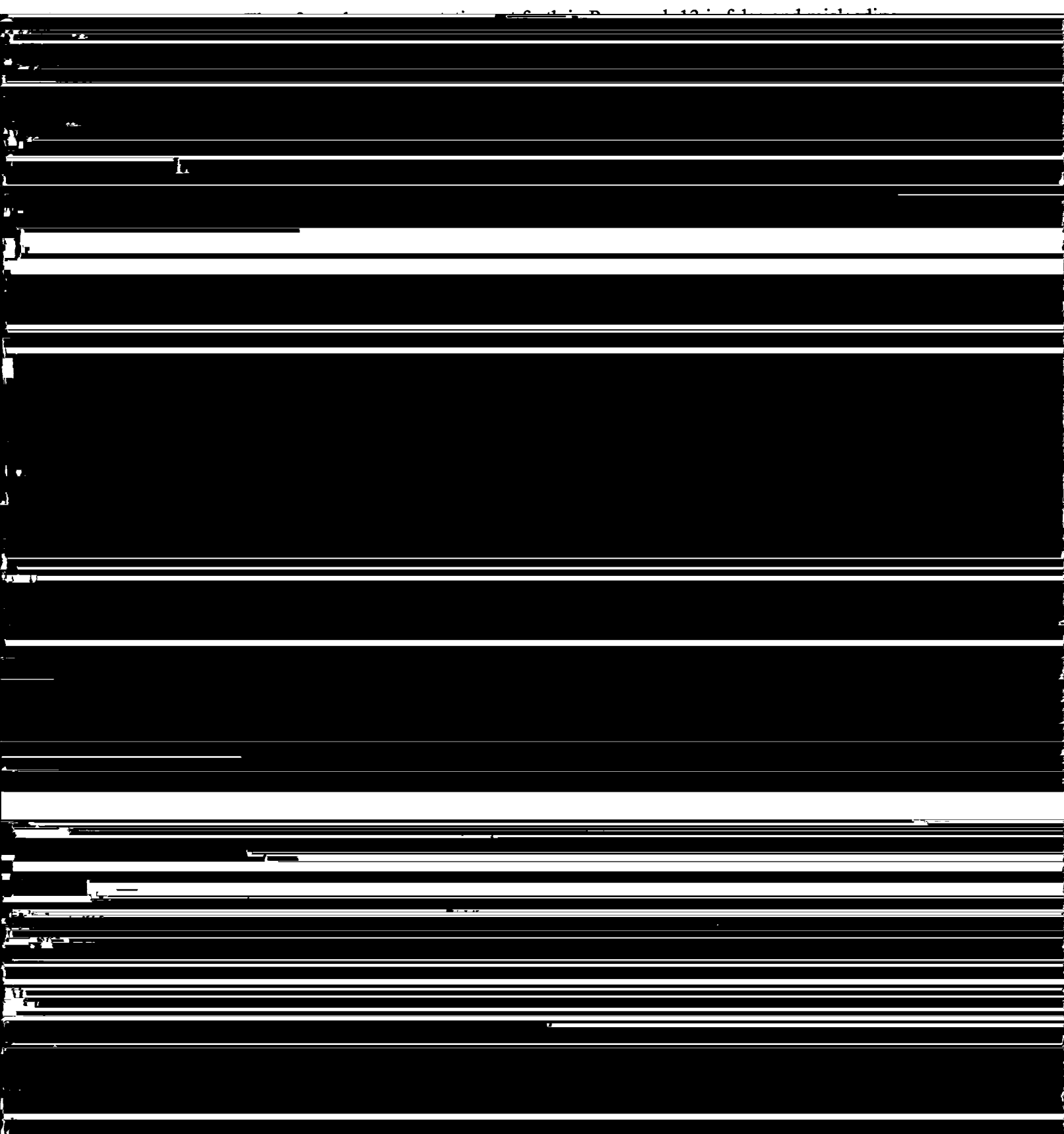




of providing those consumers with the VISA or MasterCard credit cards promised during the telephone calls.

10. Instead of providing consumers with VISA or MasterCard credit cards, they sometimes have provided consumers with packets of materials containing general information about credit and finances, including information on how to obtain credit, repair credit, and avoid credit card fraud and financial scams, as well as information about discount shopping and travel

14. In truth and in fact, in numerous instances, after paying defendants a fee, consumers do not receive an unsecured major credit card, such as a VISA or MasterCard credit card.



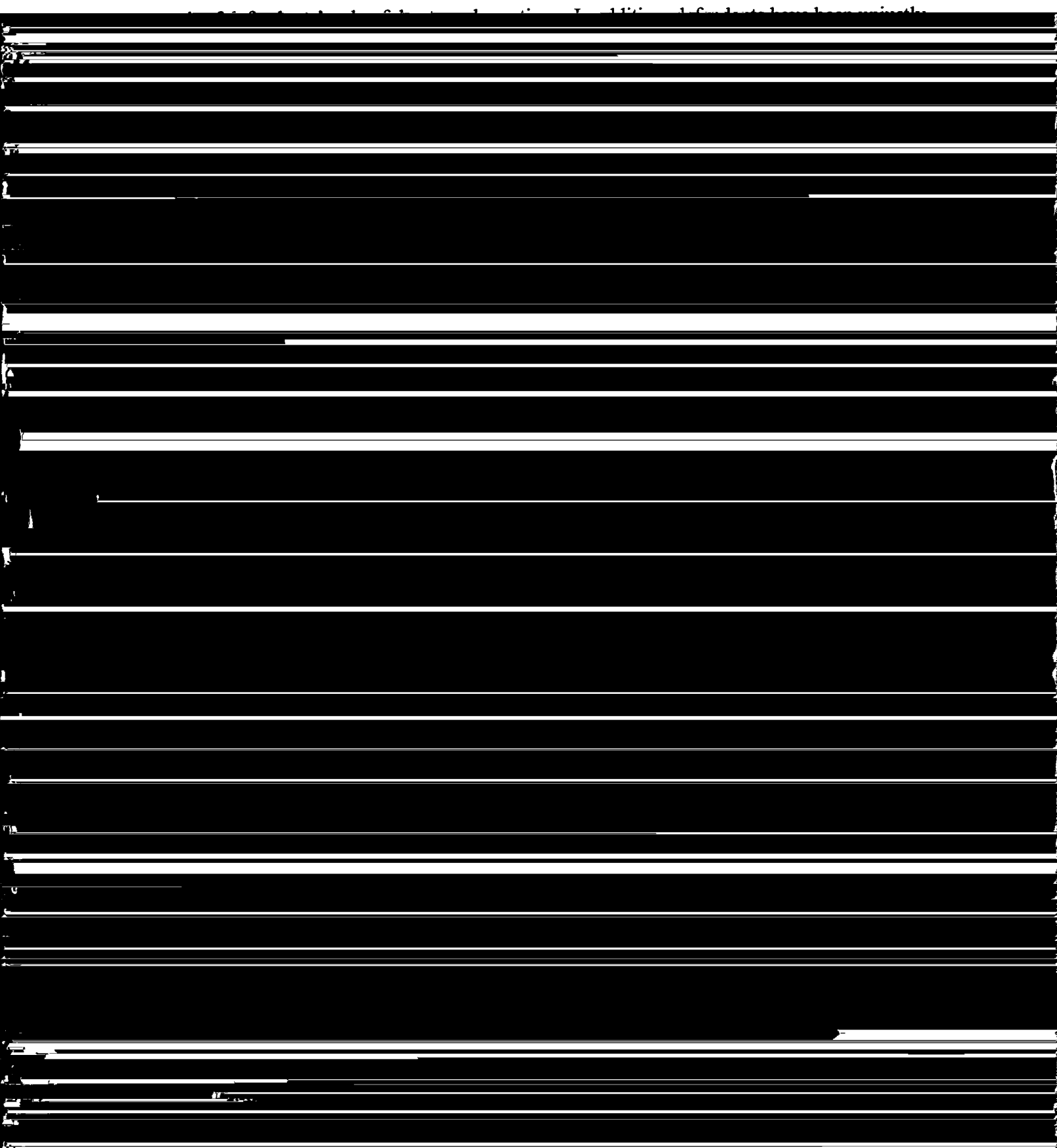
Rule constitute unfair or deceptive acts or practices in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

20. Defendants are or have been “sellers” or “telemarketers” engaged in

“telemarketing” as that term is defined in the FTC Telemarketing Sales Rule, 16 C.F.R. §§

CONSUMER INJURY

25. Consumers throughout the United States have suffered substantial monetary loss



including, but not limited to, rescission or reformation of contracts, restitution, refund of monies paid, and disgorgement of ill-gotten monies; and

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

Dated: May 28, 2002