

[The page contains approximately 25 lines of text that have been completely obscured by heavy horizontal black redaction bars.]

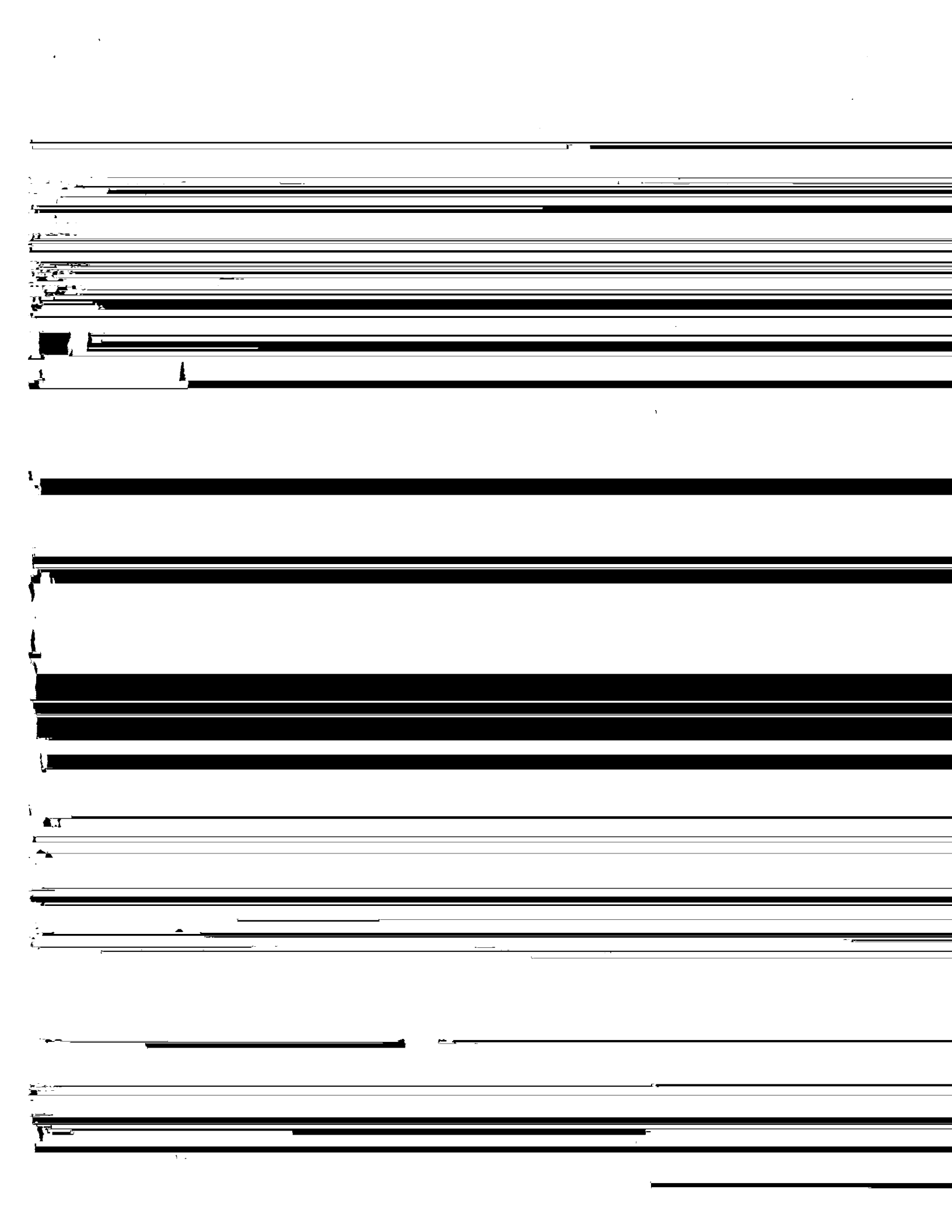
Plaintiff, the Federal Trade Commission ("FTC" or "the Commission") for its complaint

[REDACTED]

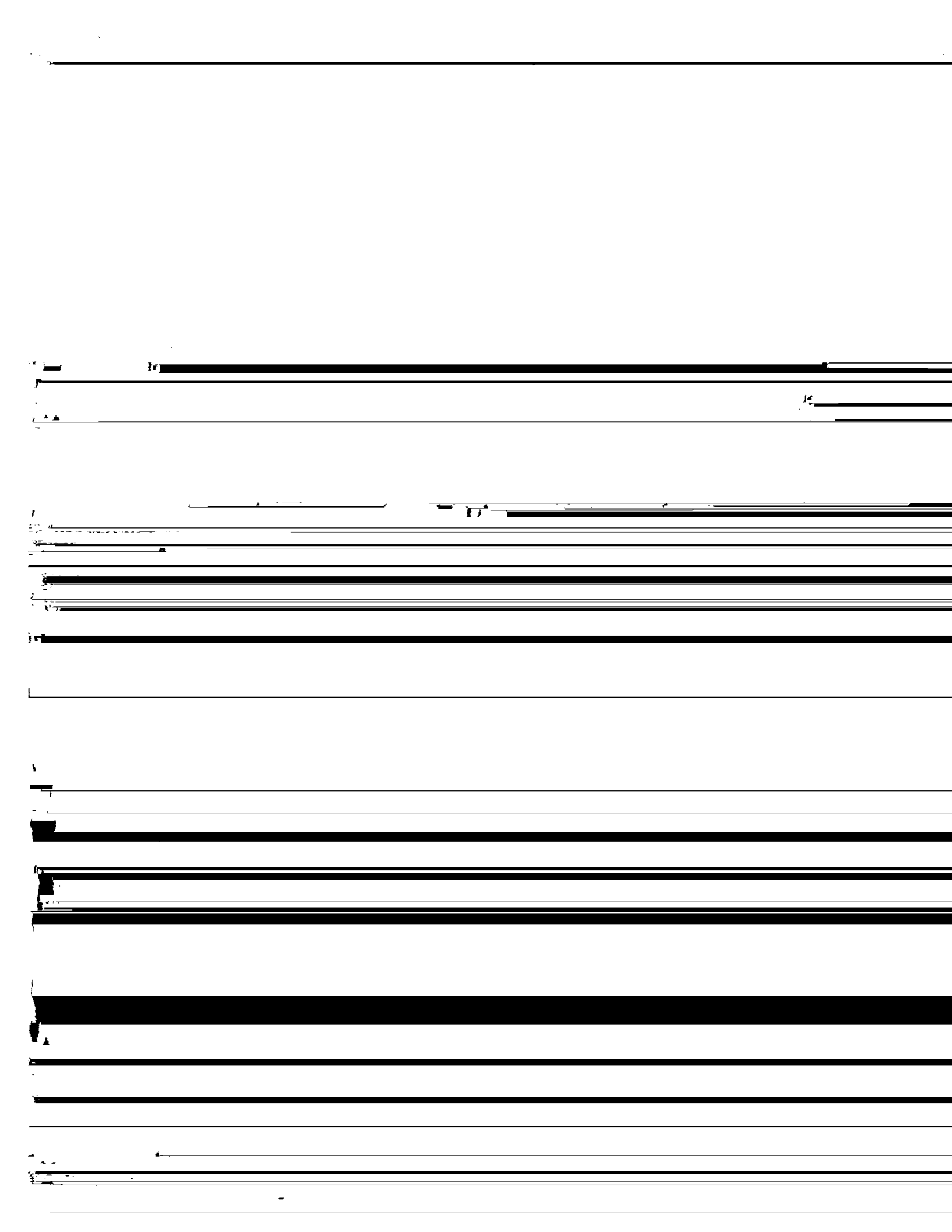
proceedings, by its own attorneys, to enjoin violations of the FTC Act and the Telemarketing

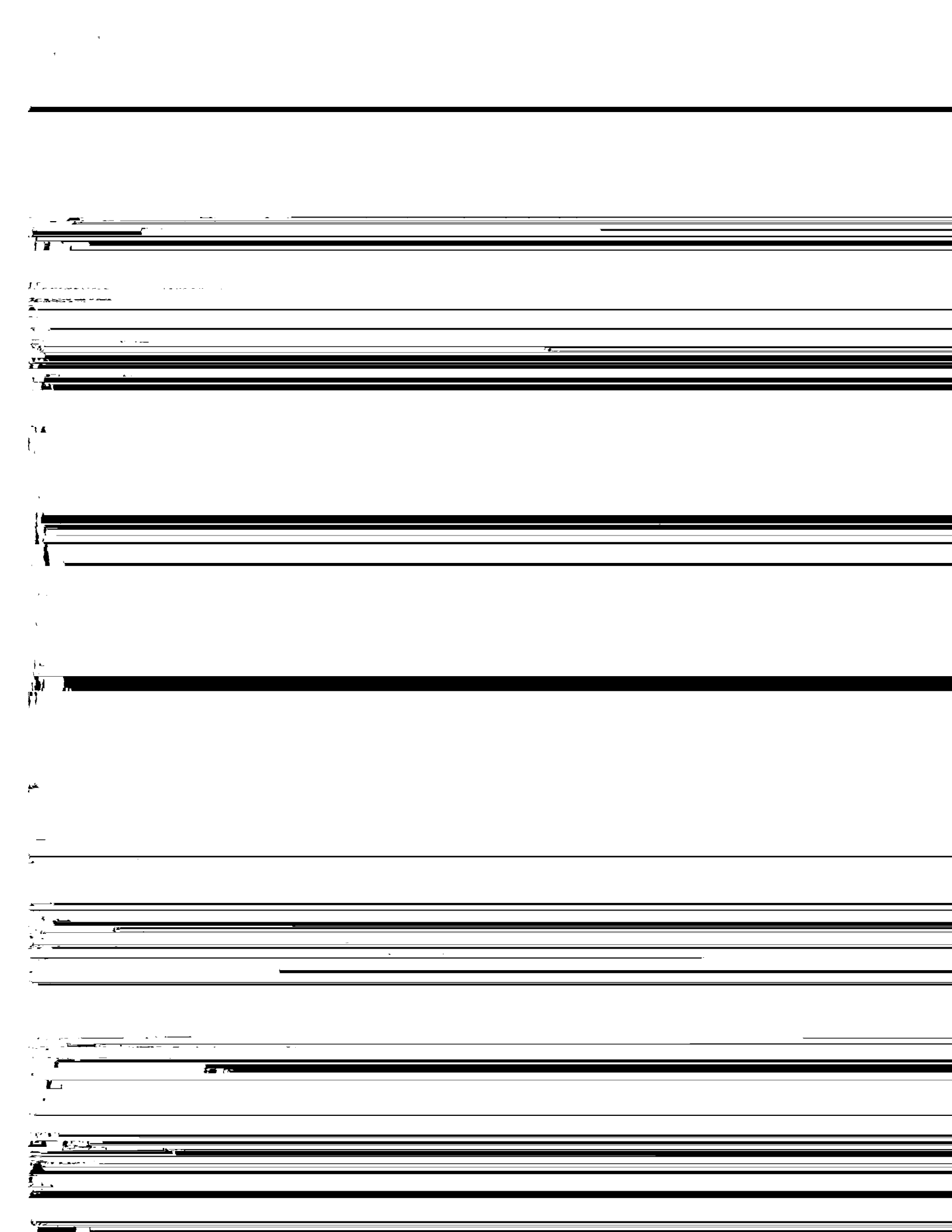
Sales Rule, and to secure such equitable relief as may be appropriate in each case, including

[REDACTED]









that after paying Defendants a fee, consumers will, or are highly likely to, receive an unsecured major credit card, such as a VISA or MasterCard credit card.

28. Defendants have thereby violated Section 310.3(a)(2)(iii) of the Telemarketing Sales Rule, 16 C.F.R. § 310.3(a)(2)(iii).

**COUNT THREE**

29. In numerous instances, in connection with the telemarketing of advance fee credit cards, Defendants or their employees or agents have requested and received payment of a fee in advance of consumers obtaining a credit card when Defendants have guaranteed or represented a high likelihood of success in obtaining an unsecured credit card for the consumer.

[REDACTED]





additional relief as the Court may determine to be just and proper.