

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

FILED BY \_\_\_\_\_ D.C.  
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SERKICE

alleges:

1. The FTC brings this action under Sections 13(b) and 19 of the Federal Trade

Commission Act ("FTC Act"), 15 U.S.C. §§ 52(b) and 57b, and the Telemarketing and

Commission Act ("FTC Act"), 15 U.S.C. §§ 55(b) and 57b, and the Telemarketing and

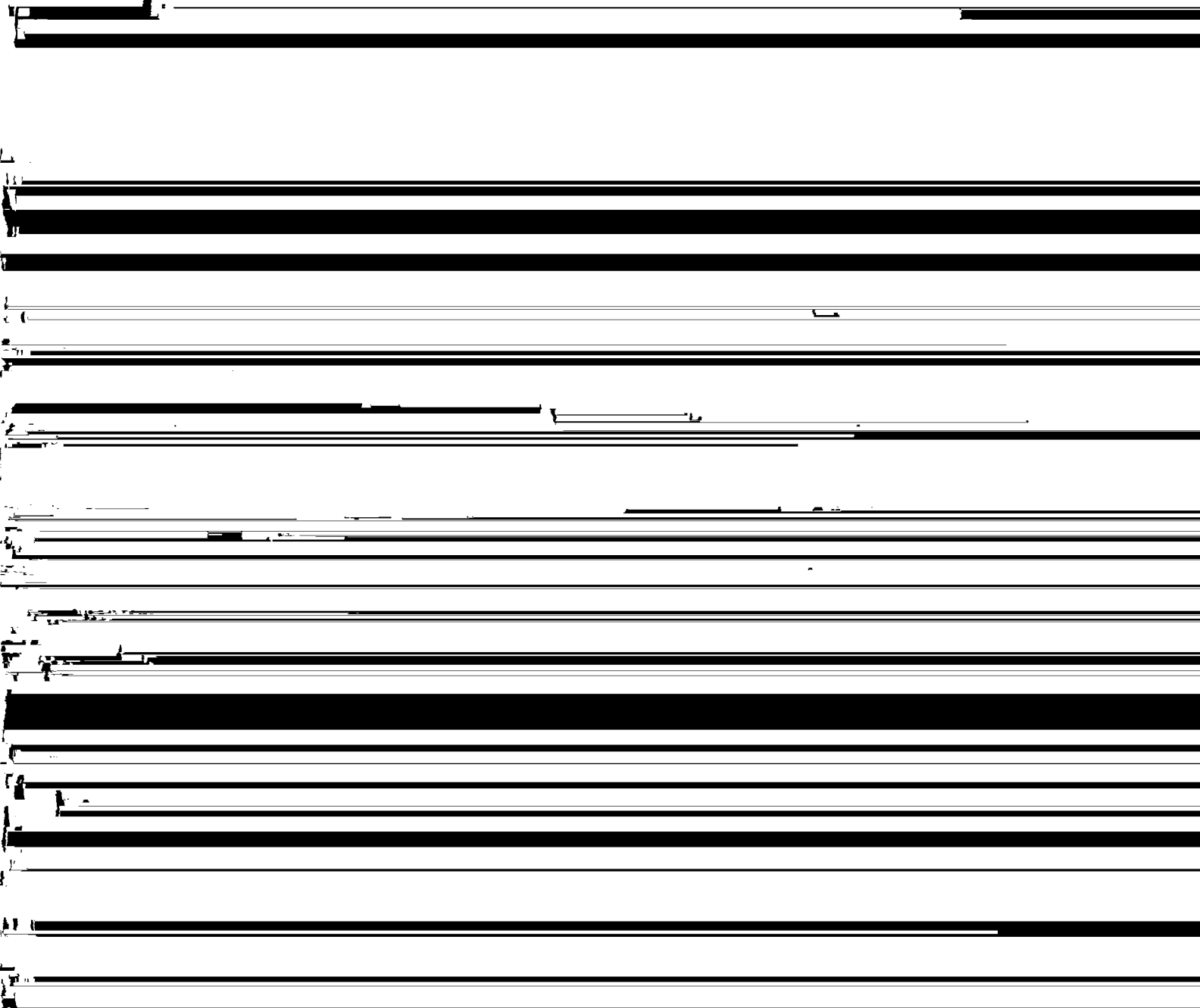
Commission Act ("FTC Act"), 15 U.S.C. §§ 55(b) and 57b, and the Telemarketing and

initiate federal district court 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 restitution for injured consumers. 15 U.S.C. §§ 53(b), 57b, 6102(c), and 6105(b).

**DEFENDANTS**

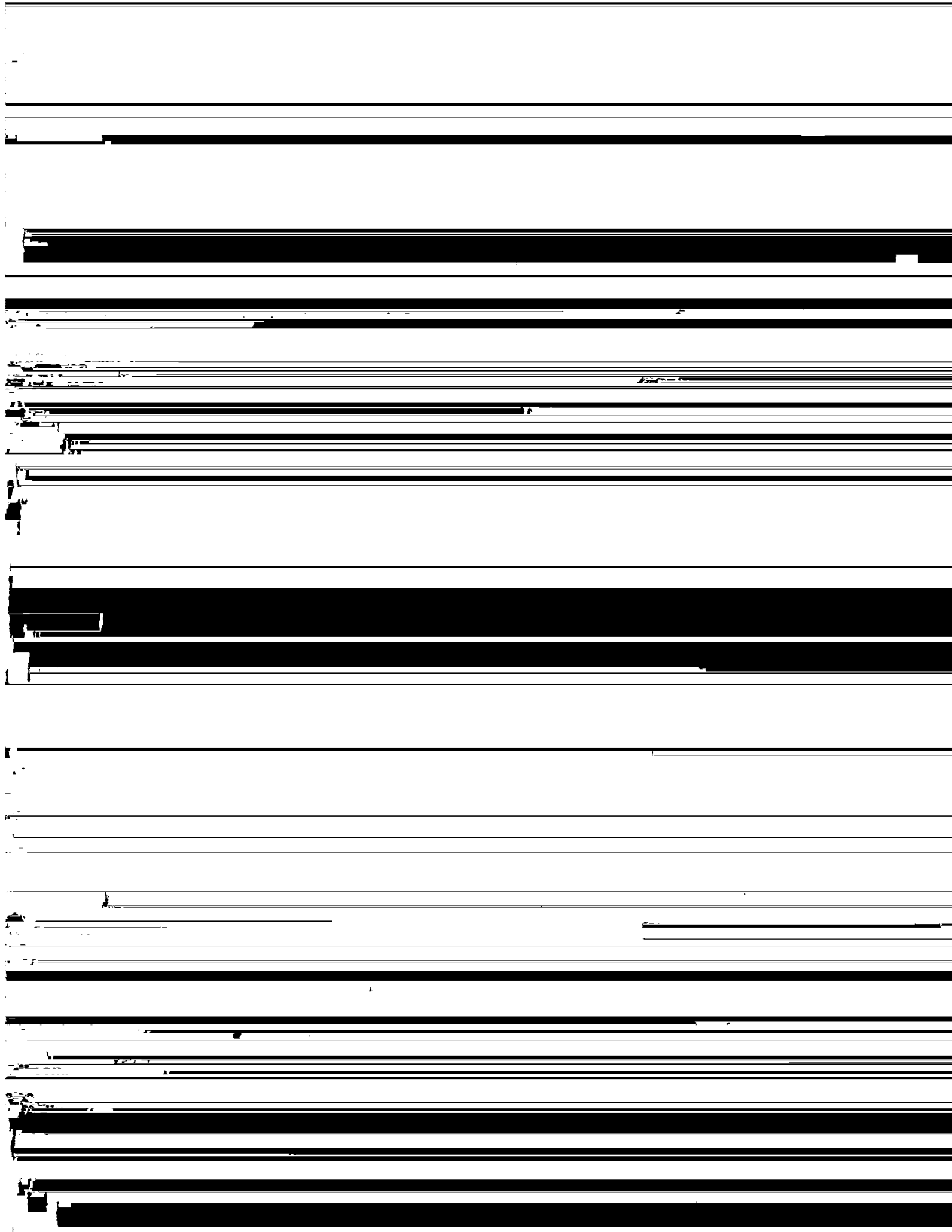
5. Defendant Scott Jason Kaduk (hereinafter "Kaduk") is the President, or has

held the position of President of Premier Financial Services International, Inc. Premier



Missouri) was a Florida corporation with its principal place of business at 4201 N. Dixie

[REDACTED]



10. ~~For purposes of this regulation, a material fact constitutes a deceptive act or~~

~~omission if the fact is material to a consumer's decision to purchase a product or service, and the fact is not generally known to consumers.~~

~~For purposes of this regulation, a material fact constitutes a deceptive act or omission if the fact is material to a consumer's decision to purchase a product or service, and the fact is not generally known to consumers.~~

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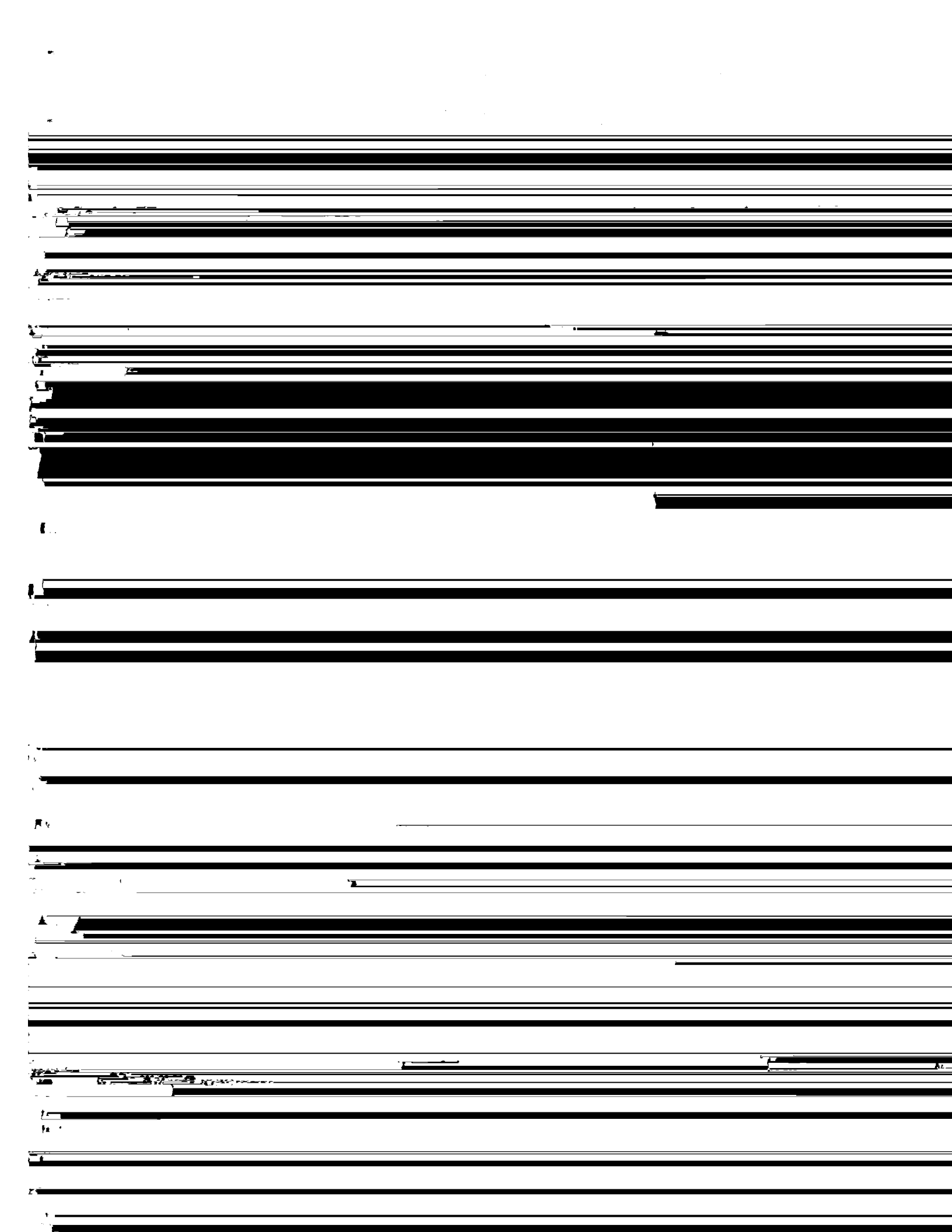
~~For purposes of this regulation, a material fact constitutes a deceptive act or omission if the fact is material to a consumer's decision to purchase a product or service, and the fact is not generally known to consumers.~~

24 The Telemarketing Sales Rule also prohibits telemarketers and sellers from.

**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





Respectfully Submitted,  
WILLIAM E. KOVACIC  
Corporal General

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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