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- 1 WILLIAM E. KOVACIC  
General Counsel
- 2 JANICE L. CHARTER
- 3 JEROME M. STEINER, JR.  
Federal Trade Commission

BY \_\_\_\_\_

1 United Family Services and USA Membership Services (“Tyme Lock”); Total  
2 Resources, Inc. (“Total Resources”); Ruth R. Adams; and Stella L. Aguilar  
3 (collectively, “defendants”), alleges:

4 1. The FTC brings this action under Sections 13(b) and 19 of the  
Federal Trade Commission Act (“FTCA”), 15 U.S.C. §§ 52(b) and 57b, and the

1 §§ 53(b), 57b, 6102(c), and 6105(b).

2 **DEFENDANTS**

3 5. Defendant Tyme Lock is a Nevada corporation, with its principal  
4 places of business at 1005 S. Cimarron Rd., Las Vegas, Nevada, and 8170 W.  
5 Sahara Ave. Las Vegas, Nevada. Tyme Lock transacts or has transacted business

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**COMMERCE**

9. At all times relevant to this complaint, defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

**DEFENDANTS' BUSINESS PRACTICES**

10. Since at least June 2000, defendants Tyme Lock and Adams, acting directly or through their employees and agents, have made unsolicited telephone calls throughout the country and falsely promised to provide credit

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1. From consumers' bank accounts defendants

[REDACTED]

**COUNT ONE**

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21. In numerous instances, in connection with the telemarketing of  
advance fee credit cards, defendants or their employees or agents have



**COUNT FOUR**

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34. In numerous instances, in connection with the telemarketing of  
advance fee credit cards defendants or their employees or agents have requested



1 and disgorgement of profits resulting from defendants' unlawful acts or practices,  
2 and other remedial measures.

...well as such other