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WILLIAM E. KOVACIC General Counsel

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JANICE L. CHARTER JEROME M. STEINER, JR. AUG 10 9 37 AM '02

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United Family Services and USA Membership Services ("Tyme Lock"); Total Resources, Inc. ("Total Resources"); Ruth R. Adams; and Stella L. Aguilar (collectively, "defendants"), alleges: The FTC brings this action under Sections 13(b) and 19 of the 4

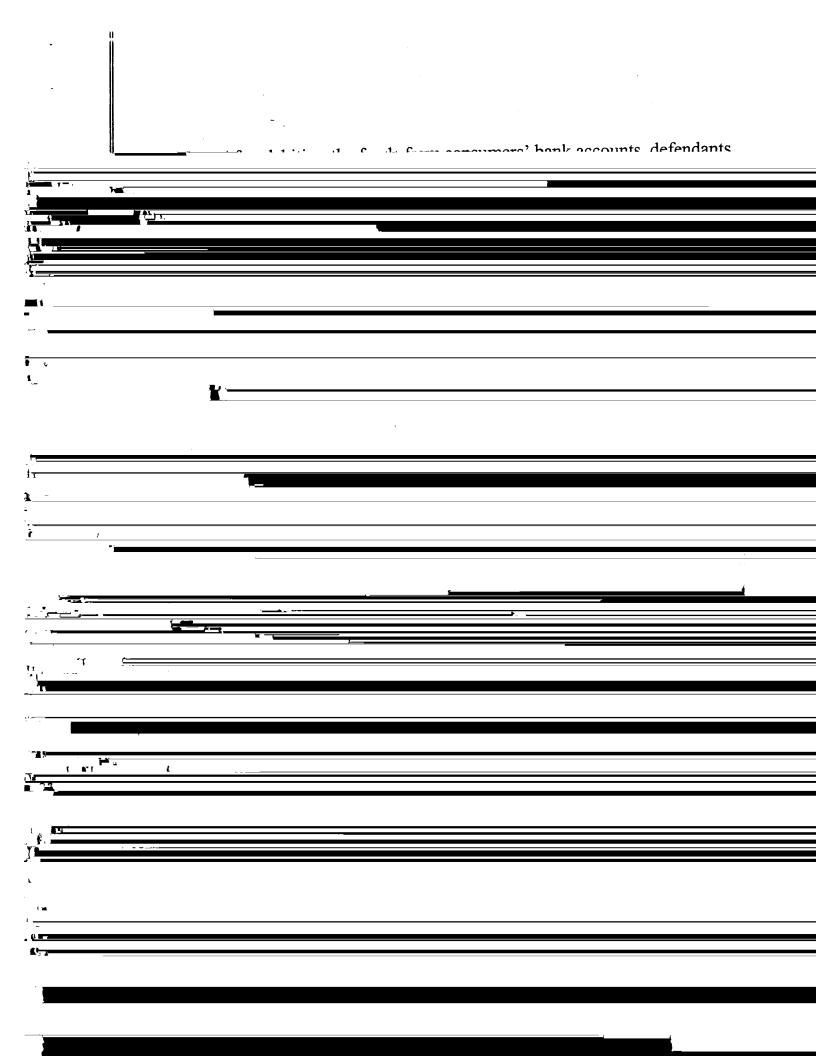
§§ 53(b), 57b, 6102(c), and 6105(b). 1 **DEFENDANTS** 2 Defendant Tyme Lock is a Nevada corporation, with its principal 3 places of business at 1005 S. Cimarron Rd., Las Vegas, Nevada, and 8170 W. Sahara Ave I as Vegas Nevada Tyme Lock transacts or has transacted business

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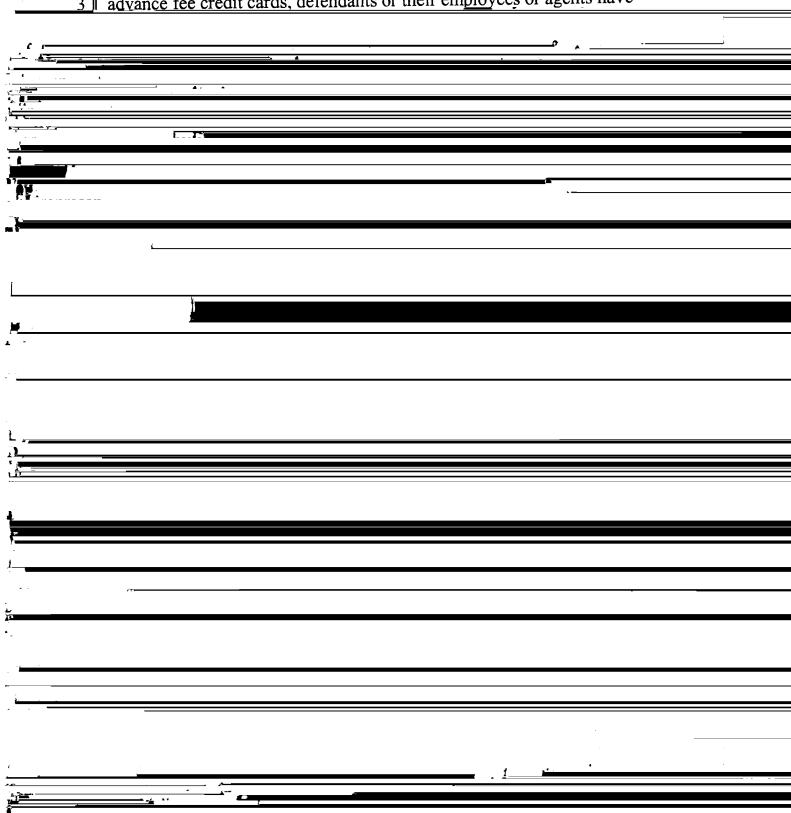
9. At all times relevant to this complaint, defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

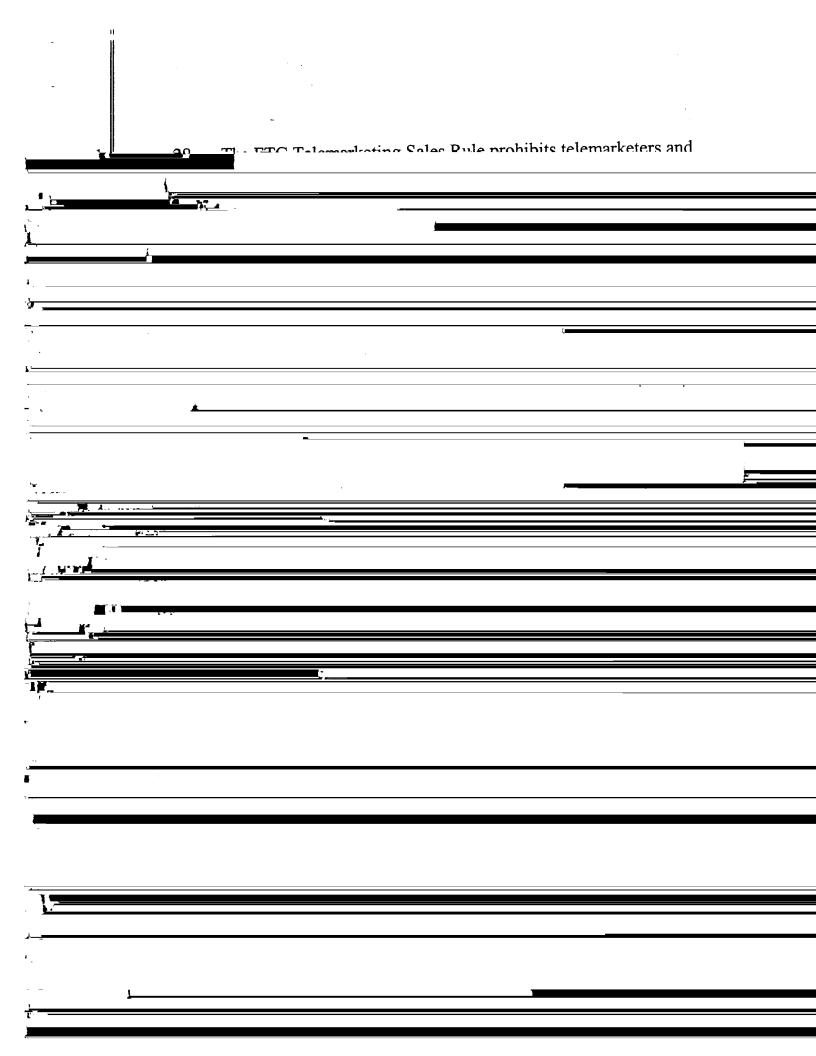
DEFENDANTS' BUSINESS PRACTICES

10.	Since at leas	st June 2000	, defendants Tyme	Lock and Adams, acting
directly or thr	ough their	employees a	nd agents, have ma	de unsolicited telephon
	.1	1 41		ramised to provide cred



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





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

