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[REDACTED]

JURISDICTION AND VENUE

2. Subject matter jurisdiction is conferred upon this Court by 15 U.S.C. §§ 45(a) and 53(b) and 28 U.S.C. §§ 1331, 1337(a), and 1345.

3. Venue is proper in the Southern District of Texas under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b).

PLAINTIFF

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

COMMERCE

6. At all times relevant to this complaint, defendant has 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.

DEFENDANT'S BUSINESS ACTIVITIES

7. Since at least October 2000, defendant, using various assumed names, including The Police Bulletin, State Police Magazine, State Police Officers Yearbook, State Police Enforcers Yearbook, Firefighters News Journal, and Creative Publishing, has engaged in a

Unauthorized advertising to be placed in law enforcement publications by claims to publish and

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

COUNT TWO

15. In numerous instances, in connection with the offering for sale and sale of advertisements, defendant has represented to businesses, expressly or by implication, that he is a member of or associated with a police force or law enforcement organization.

16. In truth or in fact, defendant is not a member of or associated with a police force or law enforcement organization.

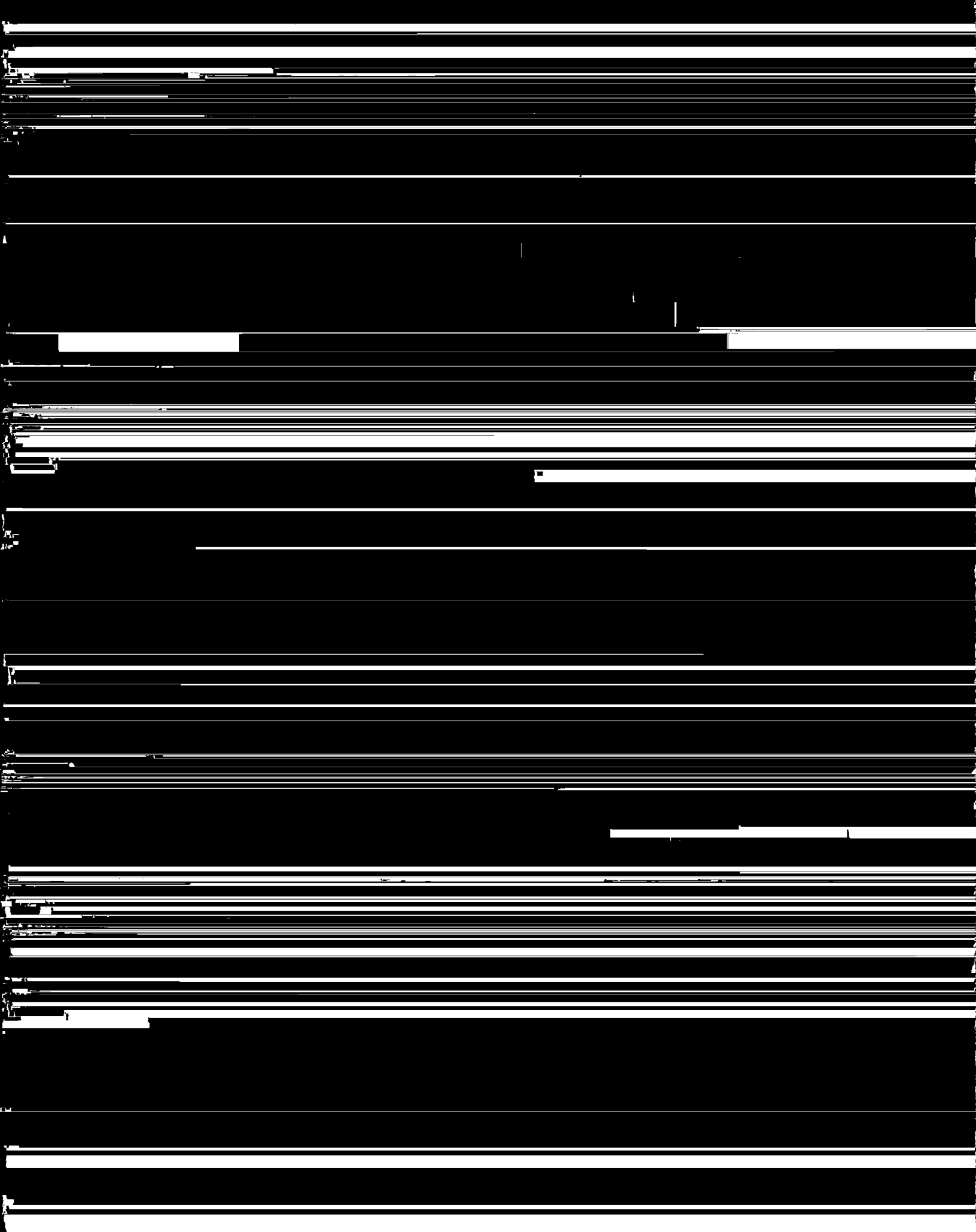
17. Therefore, defendant's representations set forth in Paragraph 15 are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

18. Consumers throughout the United States have suffered or are likely to suffer substantial monetary loss as a result of defendant's unlawful acts or practices. In addition, defendant has been unjustly enriched as a result of his unlawful practices. Absent injunctive relief by this Court, defendant is likely to continue to injure consumers and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

19. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to issue a permanent injunction against defendant's violations of the FTC Act and, in the exercise of its equitable jurisdiction, to order such ancillary relief as temporary and preliminary injunctions





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