



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

[REDACTED]

identical.

8. The scheme promoted by the defendant instructs a new recruit to mail a five dollar bill to four or five participants whose names and addresses appear in a numbered list in the message. Upon receipt of the cash payment, the participants email to the new recruit one of four or five different "reports" on how to engage in the scheme, i.e., how to send bulk spam and advertise for "free" on the Internet. In the email message, the new recruit who wants to participate in the scheme is instructed to enter his or her own name and address into position one on the list of participants.

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11. The defendant promotes what is commonly known as a "chain letter" or pyramid scheme that necessarily enriches only a few initial participants at the expense of the majority of other participants. In a chain letter, each participant receives a letter from a previous participant and is asked to send a letter to a new participant.

[REDACTED]

15 The defendant has continued to promote this program through various means.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

30. By providing participants with the chain letter and selling the "reports," the

defendant has provided the means and instrumentalities for the commission of deceptive acts and

monies paid, and the disgorgement of ill-gotten monies, as is necessary in order to redress the



