2001 NOV 19 A II: 33

a.	UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND CLERK'S OFFICE AT GREENBELT					
	FEDERAL TRADE COM	MISSION)	BY	DEPUTY		
	· · · · · · · · · · · · · · · · · · ·	1				
			ı			
-						
-		<u>- </u>				
·				·		
Ť						
	•					
	Plaint) iff,)				

BALLENGER GROUP, LLC 321 Ballenger Center Drive Frederick, Maryland 21703 Frederick County, and

Civil Action No.:

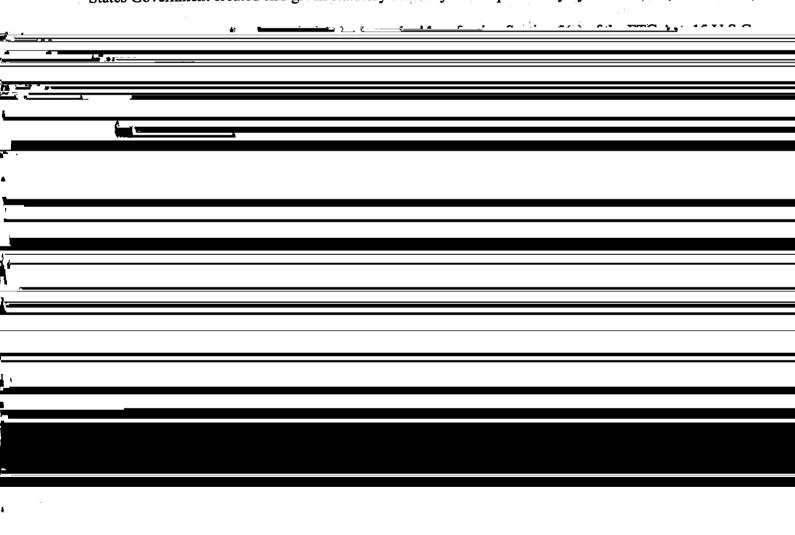
JURISDICTION AND VENUE

- 2. This Court has subject matter jurisdiction over this matter pursuant to 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 United States District Court for the District of Maryland under 28 U.S.C. §§ 1391(b) and (c), and 15 U.S.C. § 53(b).

PARTIES

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

States Government created and given statutory authority and responsibility by the FTC Act, as amended,



	DEFENDANTS' BUSINESS PRACTICES
· L	7 Since Innuary 1 2002 Ballanger Grown has been the sale servicing commany for
د با	
<u> </u>	
-	
_	
<u>,</u> j	
<u> </u>	. A
<u></u>	
· -	
· .	
	AmeriDebt, Inc. ("AmeriDebt"), a Maryland non-stock corporation that styles itself as a non-profit credit
٨	<u>gi</u>
Vara c	
F. 1 F	
7	
	\$
· •	
- بمخ	
.	
<u> </u>	•
7	
7	
1	
•	
Ì	
\	



Ballenger has handled communications with creditors and consumers, including setting up repayment terms with creditors, fielding incoming calls from consumers, making outgoing calls to consumers and creditors, updating consumers' information, collecting payments from consumers, and disbursing payments to creditors. Its customer service employees answer telephone calls identifying themselves as "AmeriDebt."

Ballenger Group took over the servicing operations formerly performed by DebtWorks Inc. ("DebtWorks"), a for-profit company wholly owned by Andris Pukke ("Pukke"), who also assisted

	THE CONTRACTOR OF CONTRACT CONTRACTOR CONTRA	
,		
*		
1		
£		
- A		
	Count I: Deceptive Omission That AmeriDebt Retains All or a Substantial	
	The state of the s	
		=
		i
1°		
r		
<u>e</u>		
t		
-1	12 Plaintiff incorporates by reference all the foregoing paragraphs	
-1	13. Plaintiff incorporates by reference all the foregoing paragraphs.	
	14. Defendants have represented, expressly or by implication, that consumers' payments will	
	14. Defendants have represented, expressly or by implication, that consumers' payments will be disbursed to creditors. Defendants have failed to disclose that AmeriDebt keeps all or a substantial	
	14. Defendants have represented, expressly or by implication, that consumers' payments will	

Enter judgment against Defendants and in favor of plaintiff for each violation 1. charged in the Complaint; Permanently enjoin and restrain Defendants from violating the FTC Act as alleged herein; ETC Act including but not limited to the recission of. 4. Award Plaintiff such other and additional equitable relief as the Court may determine to

be just and proper.

Dated: November 19, 2003

Respectfully Submitted, FEDERAL TRADE COMMISSION WILLIAM E. KOVACIC General Counsel

JEANNE-MARIE S. BURKE MAIYSHA R. BRANCH

Federal Trade Commission
600 Pennsylvania Avenue, NV

600 Pennsylvania Avenue, NW

Room NJ-3158

Washington, DC 20580

(202) 326-2874 (telephone)

(202) 326-3768 (facsimile)

Local Counsel

ROBERT S. KAYE

MD.D.CT. # 09560

Federal Trade Commission

600 Pennsylvania Avenue, NW

Room H-238

Washington, DC 20580

(202) 326-2215 (telephone)

(202) 326-3395 (facsimile)