

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FILED
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2003 DE -9 PM 4:26

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FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Civil Action No.

A03CA 905SS

[REDACTED]

Reno, Nevada 89503.

COMMERCE

Would you like to earn \$2,900 to \$5,000, and more, each and every week for as long as you want? Wouldn't that just help you catch up with most of your bills, and allow you some time to relax and enjoy the finer things in life?...

...As you probably know, **INSERTING AND MAILING LETTERS IS ONE OF THE EASIEST JOBS IN THE WORLD...** All you have to do for us is insert the envelopes that we send you with the letters that we send you and then mail them out so that you can receive your paycheck. Can you find an easier job than this? That pays as well? We can't think of any...Can you? (Emphasis in original, underlining added).

11. Defendants' mailers also directly link the amount of money a consumer can earn to the amount of money the consumer pays to defendants:

For your convenience, we have established **5 Different Income Groups**. You choose the group you want to work under. Each Group Has A Different Earning Potential. And A Different Number of Starting Supplies. The earning potential in Group 1 is \$590.00 weekly. Group 2 is \$790.00. Group 3 is \$990.00. **Group 4, our most popular group has an earning potential of \$2,900.00 weekly.** Group 5 is for established mailers who start in Group 4 and get promoted after receiving their

first \$2,900.00 in pay. When you reach **Group 5, you have the potential to make \$5,000.00 and more weekly....**

IN ORDER TO GET YOU STARTED IMMEDIATELY, we must require a one-time computer processing and materials fee. The fee must match the income group that you have selected. This one-time fee ensures that you are serious about earning good money for inserting and mailing our special letters. However this

Income Group #3 (\$2,000.00) Fee is \$200 -We send you 200 letters, 200 envelopes, 200

customer mailing labels.

Income Group #4, (\$2,900.00) Fee is \$290-We send you 290 letters, 290 envelopes, 290 customer mailing labels.

Now only \$149! If you respond *within 10 days*.

Income Group #5 - This income group is only for home workers who started under

Income Group #4. This income group is only for home workers who started under

VIOLATIONS OF SECTION 5 OF THE FTC ACT

21. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices in or affecting commerce.

22. As set forth below, defendants, individually or in concert with others, have violated

_____ offering for sale or selling of

services via the mails.

COUNT I

23. In numerous instances, in the course of offering for sale and selling purported

27. In truth and in fact, defendants do not pay consumers \$10.00 per envelope for all or most of the envelopes stuffed and mailed by the consumers.

28. Therefore, defendants' representations, as set forth in Paragraph 26, are false and deceptive, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45.

COUNT III

29. In violation of Section 5 of the FTC Act, 15 U.S.C. § 45, defendants have engaged in the practice of offering for sale and selling purported

acts or practices, consumers have suffered substantial monetary loss. In addition, defendants have

_____ as a result of their unlawful practices. Absent injunctive relief by this

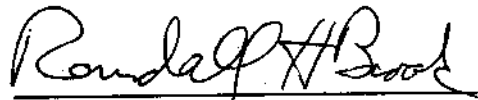
4. Award plaintiff the costs of bringing this action, as well as such other and additional equitable relief as the Court may determine to be just and proper.

Dated: December 9, 2003

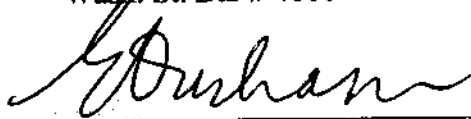
Respectfully submitted,

WILLIAM E. KOVACIC
General Counsel

CHARLES A. HARWOOD
Regional Director



RANDALL H. BROOK
Wash. St. Bar # 4860



ELEANOR DURHAM
Maryland Bar
Attorneys for the
Federal Trade Commission
915 2nd Avenue, Ste. 2896
Seattle, WA 98174
206.220.4487 (Brook)
206.220.4476 (Durham)
206.220.6366 (fax)