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MAR 24 2004

MICHAEL W. DOBRINS
CLERK

JURISDICTION AND VENUE

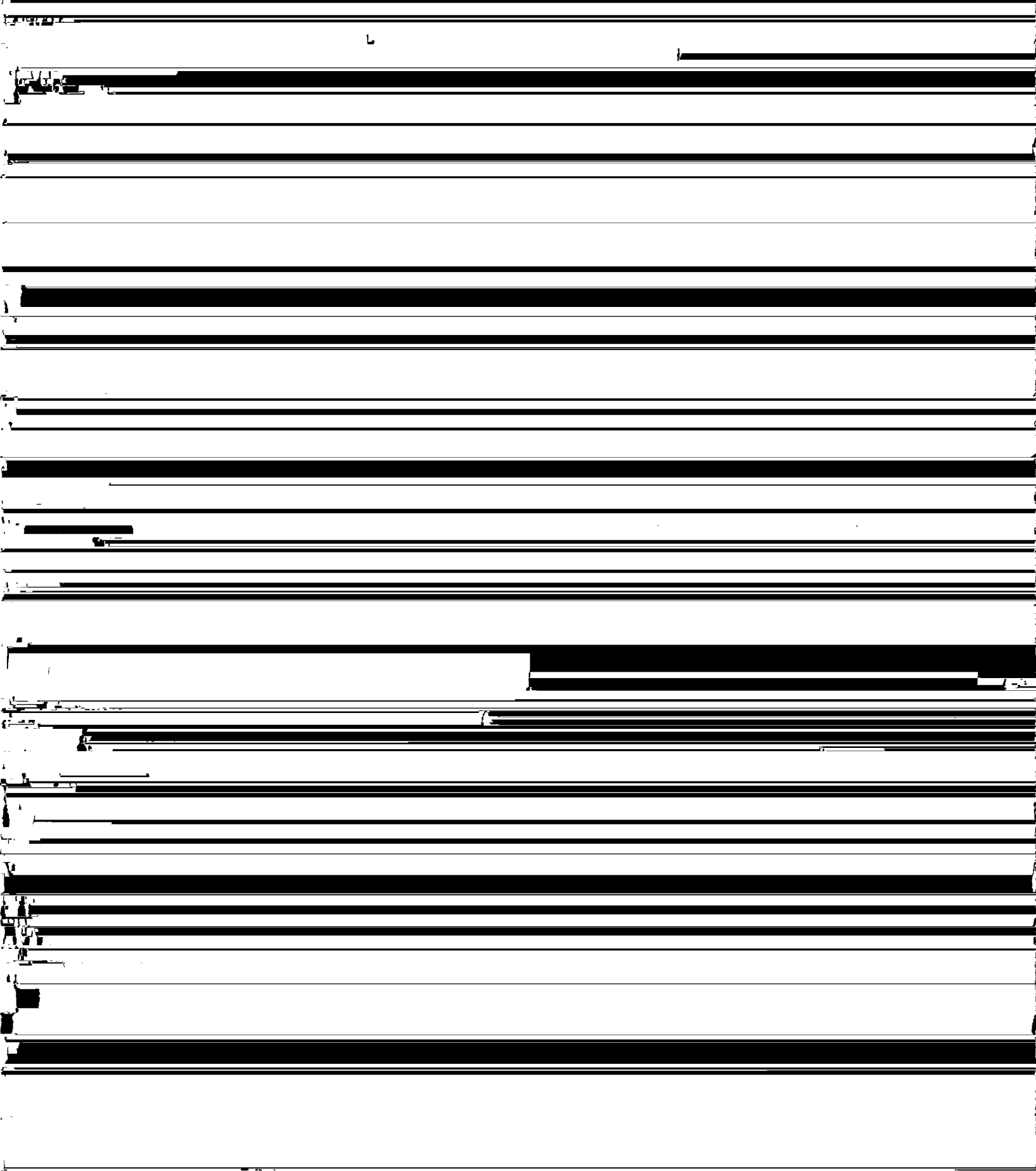
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1. This is an action arising under §§ 5(m)(1)(A), 13(b), and 16(a) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 45(a), 53(b), and 56(a), and the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §§ 1692, *et seq.*, to obtain monetary civil penalties and injunctive and other equitable relief for defendants' violation of §§ 5(m)(1)(A), 13(b), and 16(a) of the FTC Act and §§ 1692, *et seq.* of the FDCPA.

1 || president of operations of CAMCO. Kuebler has formulated the

[REDACTED]

1 | 16. On numerous occasions, in connection with the collection of debts, defendants have
2 | engaged in conduct the natural consequence of which is to harm



1 f. using any false representation or deceptive means to collect or attempt to collect
2 any debt or to obtain information concerning a consumer, in violation of Section
3 807(10) of the FDCPA, 15 U.S.C. § 1692e(10).

4 18. On numerous occasions, in connection with the collection of a debt, when the consumer
5 has notified defendants in writing within the thirty (30) day period described in Section 809(a) of the
6 FDCPA 15 U.S.C. § 1692g(a) that the debt or any portion thereof is disputed, defendants have

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The law requires us to stop contacting you about this debt if you write to us and ask us to stop. However, under the law, we may still contact you for two reasons:

- to advise you that we or your creditor intend(s) to pursue specific

- 1 5. Enjoin defendants permanently from future violations of the FDCA; and
- 2 6. Award plaintiff such additional relief as the Court may deem just and proper.
- 3

4 DATED: *March 24* 2004