

Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. § 6101 *et seq.*, and Section 522(a) of the Gramm-Leach-Bliley Act (“GLB Act”), 15 U.S.C. § 6822(a), to secure preliminary and permanent injunctive relief, rescission of contracts, restitution, disgorgement of ill-gotten gains, and other equitable relief against the Defendants for engaging in deceptive acts or practices in connection with the sale of goods or services that purport to protect against

services, that has been in or affecting commerce as "commerce" is defined in Section 4 of the
FTC Act, 15 U.S.C. § 44.

THE COMMISSIONS NATIONAL DONOR CALL REGISTRY LTD

12. The only exceptions the Commission made to the prohibition on third party

COUNT I: FTC ACT

MISREPRESENTATIONS AS TO DEFENDANTS' GOODS AND SERVICES

30. In numerous instances, in connection with the telemarketing of purported telemarketing-protection goods or services Defendants have represented, expressly or by

