

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

COMMISSIONERS:

Deborah Platt Majoras, Chairman  
Mozelle W. Thompson  
Orson Swindle  
Thomas B. Leary  
Pamela Jones Harbour

<p style="text-align: center;"><b>In the Matter of</b></p> <p><b>APPLIED CARD SYSTEMS, INC.,</b> <b>Delaware Corporation and</b></p> <p><b>APPLIED CARD SYSTEMS OF</b> <b>PENNSYLVANIA, INC.,</b> <b>Pennsylvania Corporation.</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>DOCKET NO. C-</b></p>
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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Applied Card Systems, Inc. and Applied Card Systems of Pennsylvania, Inc. (collectively “Respondents”) have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Applied Card Systems, Inc. (“ACS”) is a Delaware corporation with an office and its principal place of business located at 4700 Exchange Court, Boca Raton, Florida 33431. ACS transacts or has transacted business throughout the United States.
2. Respondent Applied Card Systems of Pennsylvania, Inc. (“ACSPA”) is a Pennsylvania corporation with an office and place of business located at 50 Applied Card Way, Glenn Mills, Pennsylvania 19342. ACSPA transacts or has transacted business throughout the United States.
3. Respondents operate business enterprises that provide services to credit card companies, including, but not limited to the collection of delinquent debts from consumers



11. In many other instances, in connection with the collection of delinquent debts, Respondents have engaged in conduct the natural consequence of which is to annoy, abuse, or harass the Third Parties, including, but not limited to:

- A. Using obscene or profane language or language the natural consequence of which is to abuse the hearer; or
- B. Causing a telephone to ring or engaging any Third Party in telephone conversation with intent to annoy, abuse, or harass any Third Party at the called number.

12. The acts and practices of Respondents as alleged in this Complaint constitute unfair acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a).

13. Respondents' violations of Section 5 of the FTC Act, as set forth above, are continuing and will continue absent the relief herein requested.

**THEREFORE**, the Federal Trade Commission this        day of        , 2004, has issued this Complaint against Respondents.

By the Commission

Donald S. Clark  
Secretary

SEAL: