





1 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce, as

1 distribution business ventures. TGC transacts or has transacted business in the Central  
2 District of California.

3 9. Defendant Musketeer Partners, Inc. ("MP") is a Nevada corporation  
4 incorporated on May 22, 1997. Its principal place of business is at 3083 Lima Street,  
5 Burbank, California. From at least June 2003 and continuing to the present, MP has  
6 marketed and sold Internet-based surplus goods business opportunities and  
7 advertisement of other name-brand websites. MP transacts or has transacted business  
8 in the Central District of California





1. WETA et al. in that MD's venture involves the brokerage of similar membership

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 | a foolproof, turnkey business: "Men and women of all ages, working part-time or full



- 1 Defendants' brochures lure prospective purchasers with the promise that "there are no
- 2 limitations to your earnings" from the business opportunity.

1 found that the pre-qualified businesses either had never heard of the defendants or

40. Once the prospect has had a chance to contact these sources

1           48. Therefore, defendants' representations as set forth in Paragraph 46 are  
2 false and misleading and constitute deceptive acts or practices in violation of 15 C.F.R. § 261.12(a)(1).

1 reliable descriptions of their experiences with one of the defendants' business  
2 ventures.

3 54. Therefore, the defendants' representations as set forth in Paragraph 52

4 are false and misleading and constitute deceptive acts or practices in violation of

1 franchise operates, the litigation history of the franchisor and its principals, and  
2 information identifying existing franchisees. 16 C.F.R. § 436.1(a)(1) - (a)(20). The  
3 pre-sale disclosure of this information required by the Rule enables a prospective  
4 franchisee to contact prior purchasers and take other steps to assess the potential risks

1 62. Pursuant to Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), and 16  
2, C.F.R. § 436.1, violations of the Franchise Rule constitute unfair or deceptive acts or

1 Franchise Rule. Absent injunctive relief by this Court, the defendants are likely to

operations to injure consumers and harm the public interest



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]