

FILED

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2004 JAN 26 PM 1:01

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

JURISDICTION AND VENUE

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2. This Court has subject matter jurisdiction over the

3

TEC's claims pursuant to 15 U.S.C. §§ 45(a) and 52(b) and as

1 | directs, controls, or participates in the acts and practices of  
2 | the corporate defendant. Morgan resides and transacts business  
3 | in the Central District of California.

1 | under the eCommerce Consultant who recruited him or her (also  
2 | called the eCommerce Consultant's "downline"). In this fashion,

1 | Consultant membership its "Complete Internet Package" ("CIP").

2 | 14. Defendants have represented to their members that

1 | Representatives. Defendants have represented that the money an

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

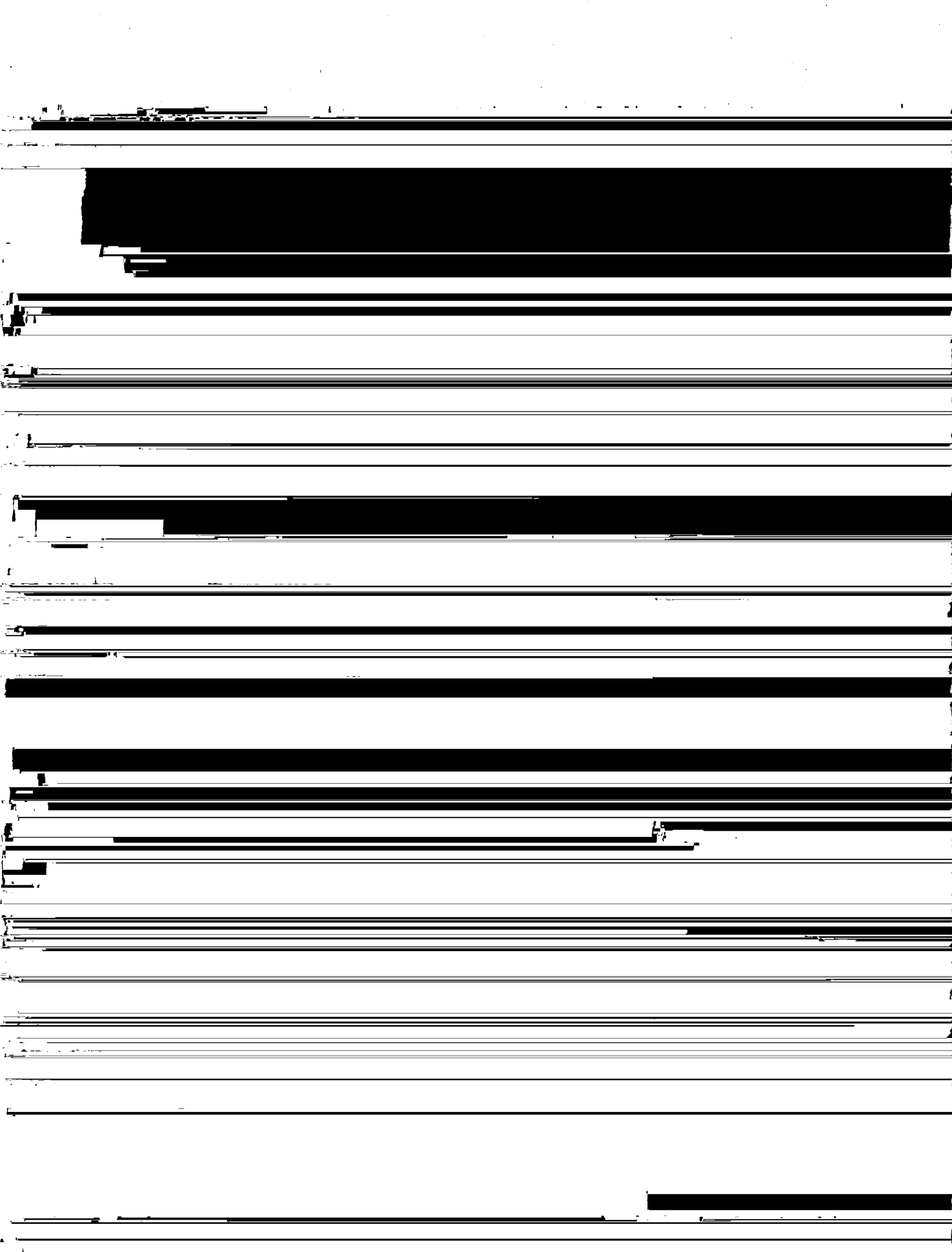
[REDACTED]

[REDACTED]

1 | have not told consumers that the vast majority of eCommerce

2 | Consultants lose money by participating in the 2hr? net program.





1 | significant compensation from the 2by2.net program. The vast  
2 | majority of 2by2.net eCommerce Consultants have enjoyed little or  
3 | no financial success from participating in the 2by2.net program.

4 | VIOLATIONS OF SECTION 5 OF THE FTC ACT

1 represented, expressly or by implication, that consumers who join  
2 the 2by2.net program are likely to realize substantial financial  
3 gain.

4 33. Defendants have failed to disclose that most consumers  
5 who join the 2by2.net program are not likely to realize

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1 3. Award Plaintiff the costs of bringing this action, as  
2 well as such other and additional relief as the Court may

3 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]