

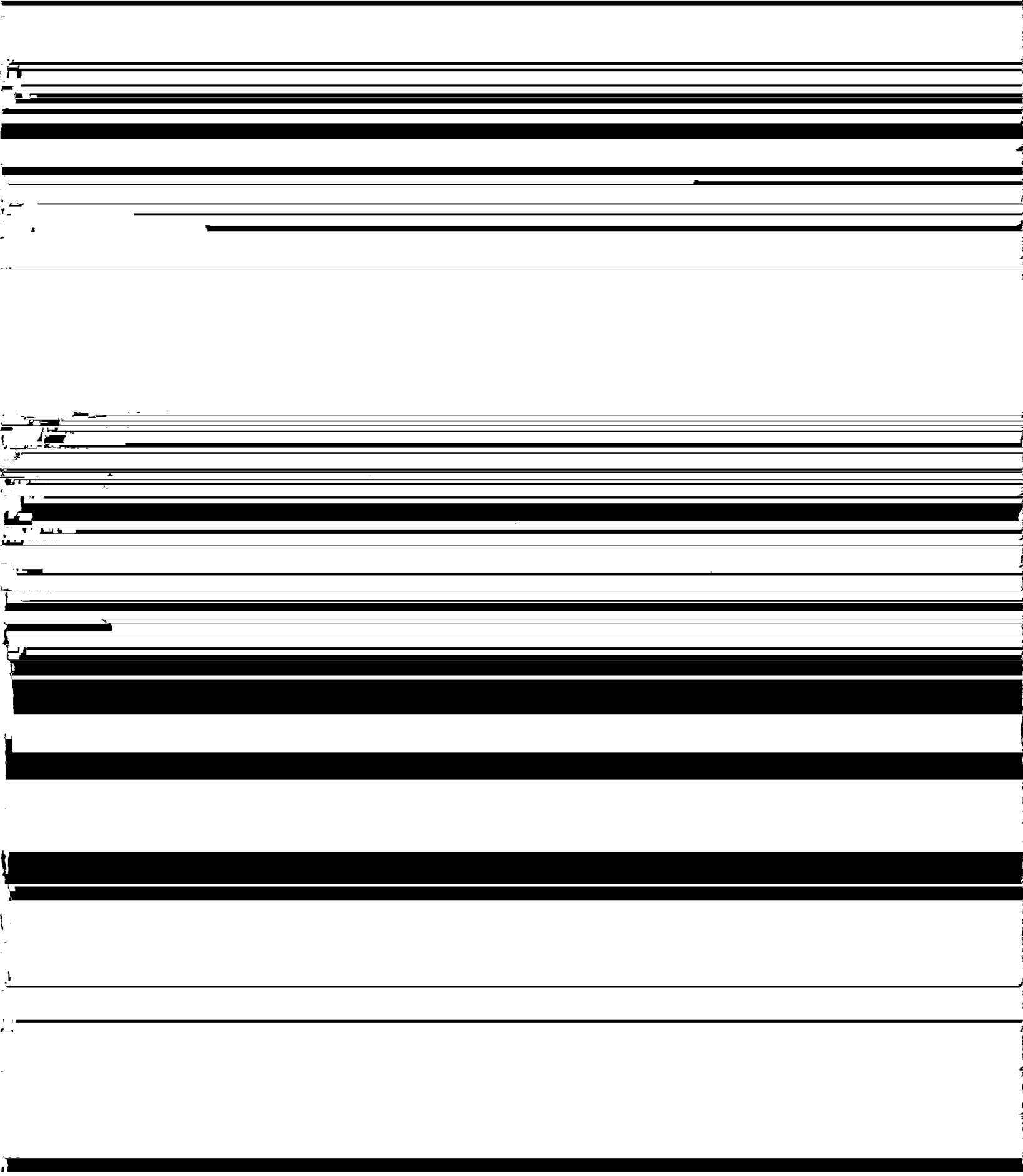
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11 Attorneys for Plaintiff

Plaintiff, the United States of America acting upon notification and authorization to the



5. Defendant Kurt Cuddy is an officer, director, or manager of FMFG. At all times material  
1 to this Complaint, acting alone or in concert with others, he has formulated, directed,  
2 controlled, or participated in the acts and practices of FMFG, including the acts and  
3 practices set forth in this Complaint. He has aided, abetted, conspired, and directed

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

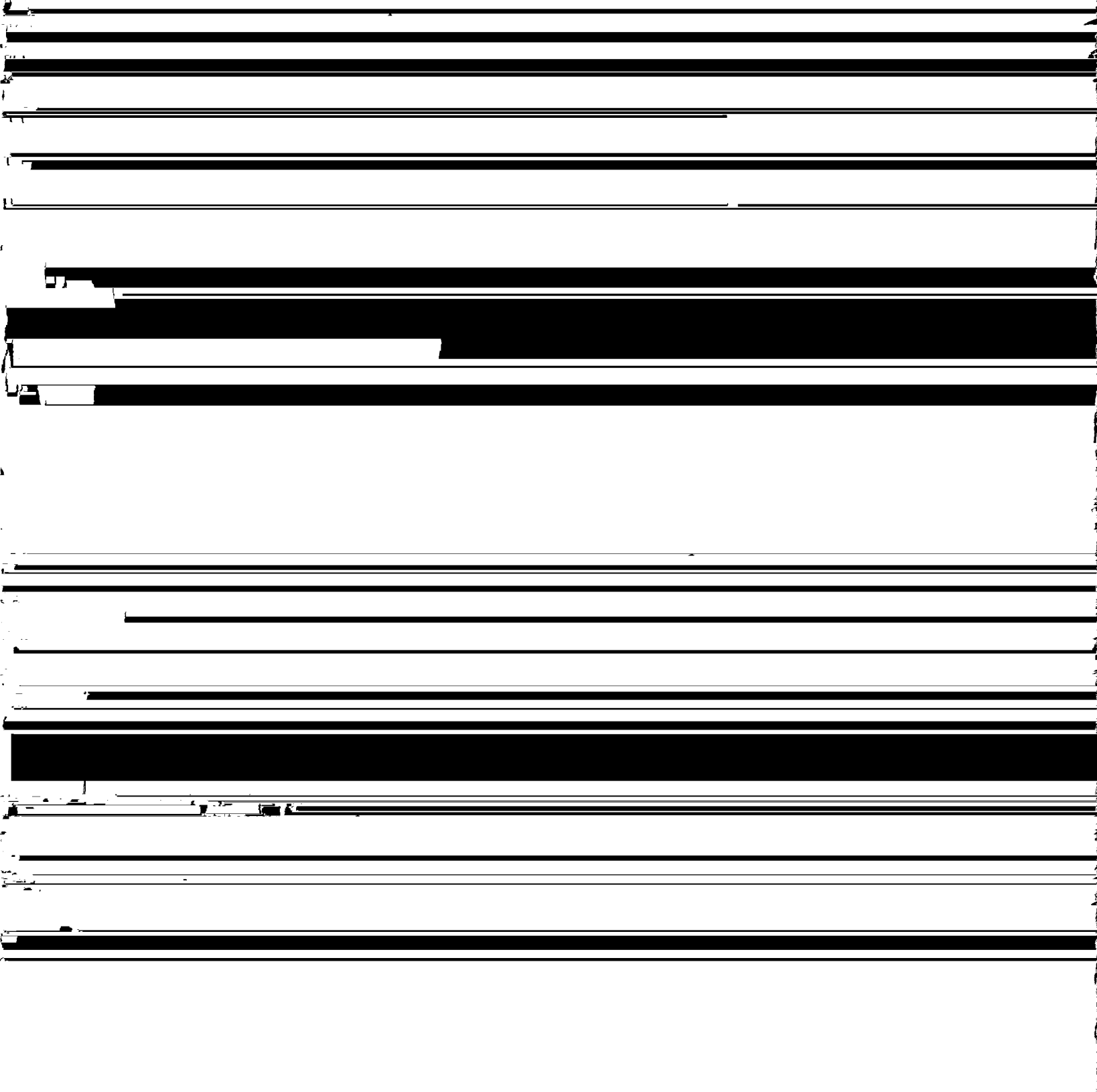
[REDACTED]

[REDACTED]

[REDACTED]

9. Since September 2, 2003, sellers, telemarketers, and other permitted organizations have  
1 been able to access the Registry over the Internet at *telemarketing.donotcall.gov* to  
2 download the registered numbers.

3 10. Since October 17, 2003, sellers and telemarketers have been able to access the Registry



13. Since October 1, 2003, sellers and telemarketers have been prohibited from abandoning  
any outbound telephone call by not connecting the call to a representative within two (2)

seconds of the consumer's completed greeting. 16 C.F.R. § 310.40 (1)(i).

1

them adjustable beds. As a part of the telemarketing campaign, Defendants have called

consumers to schedule sales presentations in the summer of 2005. Defendants have

**Count II**  
**Abandoning Calls**

1 24 In numerous instances, in connection with telemarketing, Defendants have at 1

caused ot [redacted] hers to abandon, an outbound telephone call by failing to connect the call to a [redacted]

amended and as implemented by 46 C.F.R. § 1.9843 (1997) and 46 C.F.R. § 1.9843-1 (1997).

[REDACTED]



E. Award Plaintiff such other and additional relief as the Court may determine to be just and proper.

Dated: December 29, 2005

Respectfully submitted,

FOR THE UNITED STATES OF AMERICA:

OF COUNSEL:

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