



3. Venue in the United States District Court for the Middle District of Tennessee is proper under 28 U.S.C. § 1391(b) and (c) and 15 U.S.C. § 53(b).

### THE PARTIES

4. Plaintiff Federal Trade Commission is an independent agency of the United States government created by the FTC Act, 15 U.S.C. §§ 41-58. The Commission enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The Commission, through its own attorneys, may initiate federal district court proceedings to enjoin violations of the FTC Act and to secure such equitable relief, including rescission of contracts and restitution, and the disgorgement of ill-gotten gains caused by Defendants' law violations, as may be appropriate in each case. 15 U.S.C. § 53(b).

5. Defendant Job Resources, Inc. ("Job Resources") is a Tennessee corporation with its principal place of business listed as 475 Metroplex Boulevard, Suite 208, Nashville, Tennessee 37211. Defendant Job Resources also has used a mailing address of P.O. Box 17527, Antioch, Tennessee 37217. Defendant Job Resources transacts or has transacted business in this district.

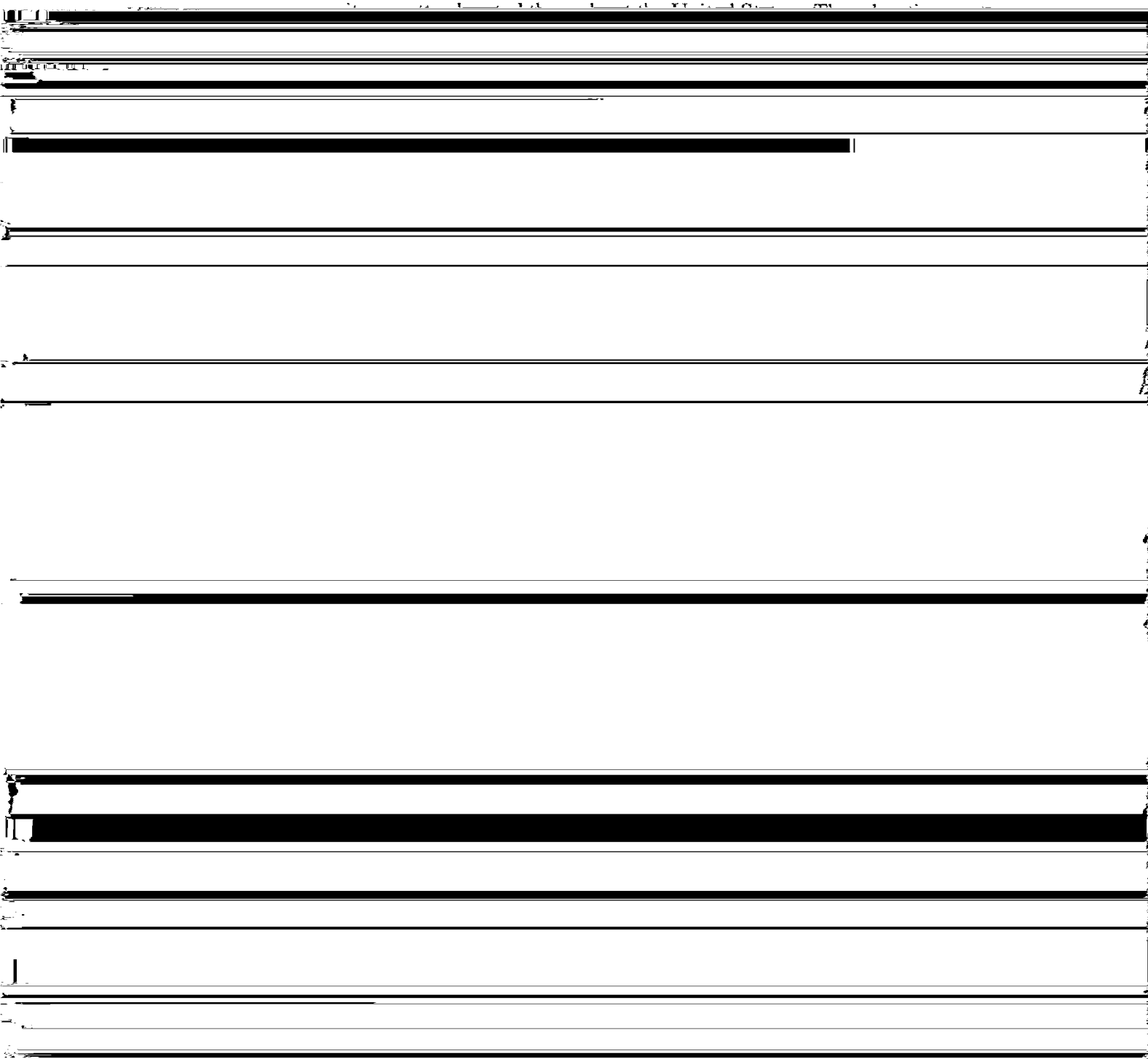
6. Defendant Jeffrey Charles Lord is the owner of Defendant Job Resources.

~~Individually or in concert with others, he directed, controlled, financed, or otherwise~~

**DEFENDANTS' BUSINESS PRACTICES**

8. Since at least January of 2004, Defendants have conducted a nationwide advertising and telemarketing scheme to sell purported employment goods and services to consumers residing throughout the United States.

9. Defendants place classified advertisements in the employment sections of local



hourly wages paid for these positions and state that the positions come with full federal benefits, paid training and vacations. Defendants explain that consumers must pass a postal employment test before they can be hired. Defendants then tell consumers they will provide consumers with

Postal Service, general job and benefit descriptions, examination instructions and "practice exams."

13. The materials received by consumers do not contain the same information that appears on the exams as promised. Nor do the materials provide information regarding exact testing dates and places for taking the exam. Likewise, the materials do not contain any

information regarding actual job openings that currently are available with the United States

Postal Service, either locally or nationally.

COUNT II

currently available in the geographic areas where Defendants' advertisements appear.

20. In truth and in fact, in numerous instances, postal positions are not currently available in the geographic areas where Defendants' advertisements appear.

21. The Court has previously found that Defendants' advertisements are not currently

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

