

[REDACTED]

JURISDICTION AND VENUE

1
2 2. Subject matter jurisdiction is conferred upon this
3 Court by 15 U.S.C. §§ 45(a) and 53(b), and 28 U.S.C. §§ 1331,
4 1337(a), and 1345.

5 3. Venue in the Central District of California is proper
6 under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b).

1 others, he has formulated, directed, controlled, or participated
2 in the acts and practices set forth in this complaint. Chadha
3 resides in and transacts or has transacted business in the
4 Central District of California.

5 COMMERCE

6 7. At all times relevant to this complaint, Defendants
7 have maintained a substantial course of business in the offering
8 for sale and sale of envelope stuffing opportunities, in or
9 affecting commerce, as "commerce" is defined in Section 4 of the

1 \$50 Cash Hiring Bonus

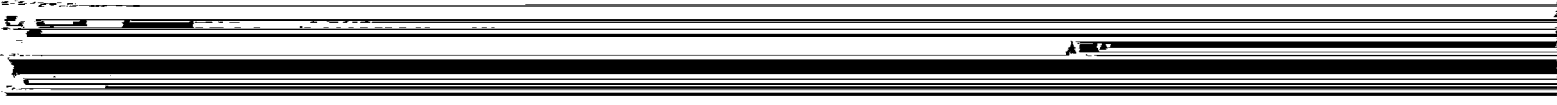
2 Written Guarantee

3 The advertisements refer consumers to a toll-free telephone
4 number for further information.

5 10. Upon calling the toll-free telephone number, a recorded

14. Defendants contend that the fee "IS FULLY REFUNDABLE

AND PROVED BY THE DEFENDANT'S OWN AFFIDAVIT OF SOLVENCY."



17. Defendants advise consumers to charge \$7 for

1 U.S.C. § 45(a).

2 COUNT II

3 23. In numerous instances, in the course of advertising,
4 offering for sale and selling their work-at-home envelope

1 future violations of the FTC Act by Defendants and, in the
2 exercise of its equitable jurisdiction, to order ancillary relief
3 such as temporary and preliminary injunctions, rescission,
4 restitution, disgorgement of profits resulting from Defendants'
5 unlawful acts or practices, and other remedial measures.

6 28. This Court, in the exercise of its equitable
7 jurisdiction, may award other ancillary relief to remedy injury
8 caused by Defendants' law violations.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff Federal Trade Commission, pursuant to
11 Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's
12 equitable powers, requests that the Court:

1 well as such other and additional relief as the Court may
2 determine to be just and proper.

3
4 Respectfully Submitted,

5 WILLIAM BLUMENTHAL
6 General Counsel

7 DATED: September 19, 2006

Barbara Y. K. Chun