

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

FEDERAL TRADE COMMISSION,

Plaintiff.

Case No.

v.

**ASSET PROTECTION GROUP, INC.
and WILLIAM S. REED, individually and
as an officer of Asset Protection Group, Inc.**

Defendants.

COMPLAINT FOR INJUNCTIVE AND OTHER EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), for its Complaint
alleges:

1. Plaintiff FTC brings this action under Section 13(b) of the Federal Trade

THE PARTIES

~~Blair Hoff, the Federal Trade Commission, et al. v. [redacted]~~

United States government created by statute. 15 U.S.C. § 41 *et seq.* The Commission is charged, *inter alia*, with enforcement of 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 is authorized to~~

telephone calls and other means. Reed has transacted business in this district.

COMMERCE

8. From 1999 to mid-2006, the defendants maintained a substantial course of trade in the offering for sale and sale of a training and business opportunity program, in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS' COURSE OF CONDUCT

9. From 1999 to mid-2006, the defendants promoted, marketed, and sold a training

and business opportunity program in the field of "asset protection" based on false

explosive-growth business” and that demand for its services “has never been greater.”

13. The defendants further represented to prospective purchasers that “asset protection consultants” were likely to earn substantial income. A solicitation letter sent to prospective purchasers states:

Obviously it takes only a couple of clients each week to produce a very substantial

It doesn't take much imagination to see that getting just six or eight clients in an entire month's time is a VERY reasonable, very achievable goal.

Of course, 20 would be better! – providing as much as \$128,000 income to you.

Whatever your first year income goal is...

earn a substantial income.

10

Ninety four percent of "asset..."

price of the defendants' program, which was approximately \$9,800.

VIOLATIONS OF THE FTC ACT

20. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices in or affecting commerce. Misrepresentations or misleading omissions of material facts constitute deceptive acts or practices under Section 5(a) of the FTC Act.

**COUNT TWO
FAILURE TO DISCLOSE MATERIAL FACTS
CONCERNING REFERENCES**

24 In numerous instances in connection with the advertising promotion for 1/1/07

public interest.

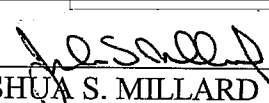
THIS COURT'S POWER TO GRANT RELIEF

[REDACTED]

Respectfully submitted,

WILLIAM BLUMENTHAL
General Counsel

JAMES A. KOHM



JOSHUA S. MILLARD
MELINDA A. CLAYBAUGH*

FEDERAL TRADE COMMISSION