



2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, as well as 15 U.S.C. §§ 45(a), 53(b), 57b, and 6105(b).

3. Venue in the United States District Court for the Southern District of Illinois is proper under 28 U.S.C. § 1391(b) and (c), as well as under 15 U.S.C. § 53(b).

#### **THE PARTIES**

4. Plaintiff, the Federal Trade Commission, is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58, as amended. 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 also enforces the TSR, 16 C.F.R. Part 310, which prohibits deceptive or abusive telemarketing acts or practices. The Commission is authorized to initiate federal district court proceedings by its own attorneys to enjoin violations

of the FTC Act and the TSR and to secure such equitable relief as may be appropriate in each case, including restitution for injured consumers. 15 U.S.C. §§ 53(b), 57b, 6102(c), and 6105(b).

transacted business in the Southern District of Illinois and throughout the United States

7. Defendant Valerie DeSalvo is an officer and director of the corporate defendant.

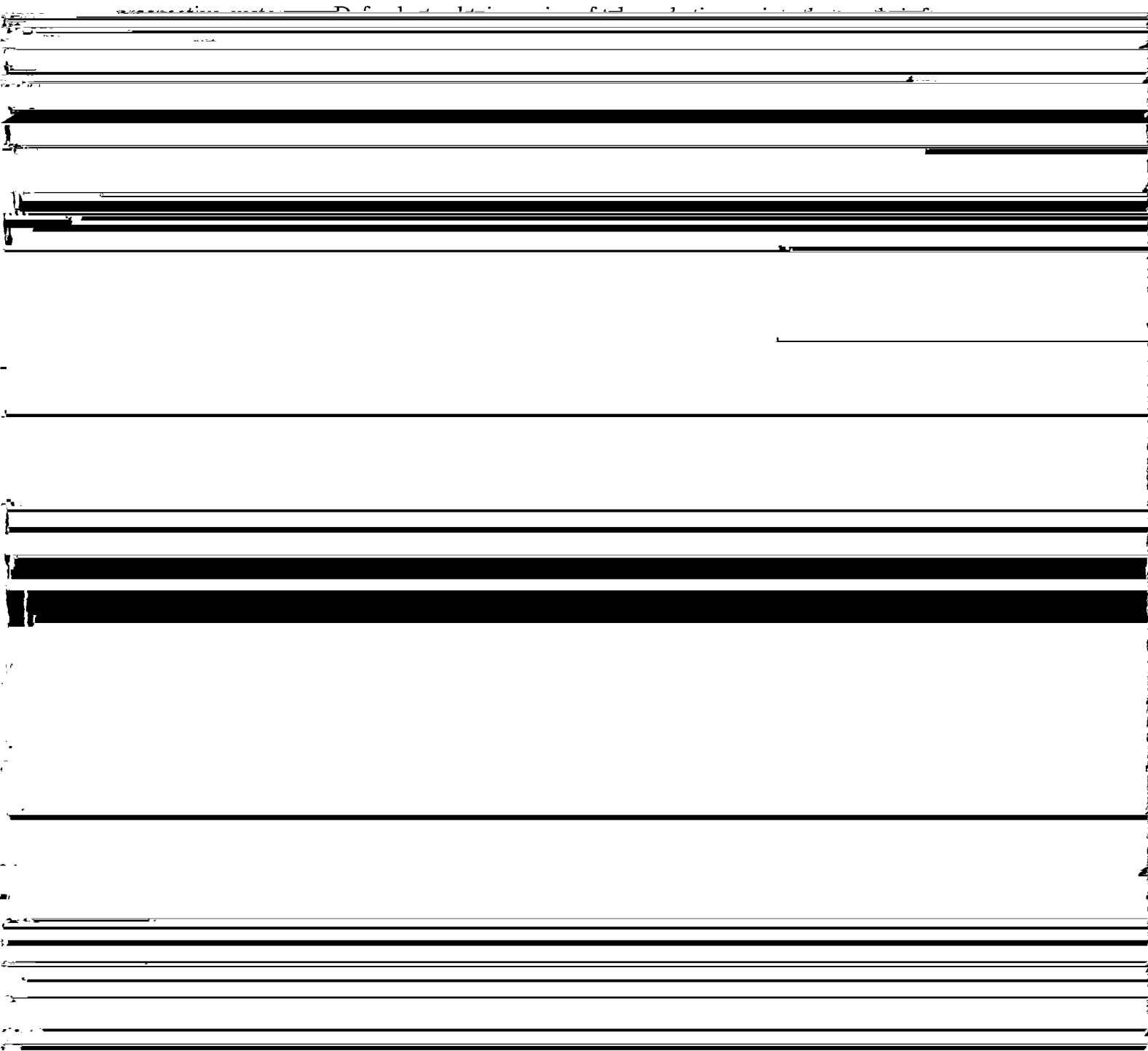
At all times relevant to this Complaint, acting alone or in concert with others, she has formulated, directed, controlled, or participated in the acts and practices of the corporate defendant, including the acts and practices set forth in this Complaint. She transacts or has transacted business in the Southern District of Illinois and throughout the United States.

COMMERCE

8. At all times relevant to this complaint, Defendants have maintained a substantial

information to telemarketers of advance-fee credit cards. Telemarketers are prohibited by the TSR from requesting or receiving payment in advance of obtaining an extension of credit when the telemarketer has guaranteed or represented a high likelihood of success in obtaining or arranging an extension of credit.

13. Defendants know that these telemarketers are engaged in the promotion and sale of advance-fee credit products because, *inter alia*, prior to selling or renting them lists of



[REDACTED]

16 C.F.R. § 310.3(b).

17. The TSR prohibits any seller or telemarketer from, “[r]equesting or receiving payment of any fee or consideration in advance of obtaining a loan or other extension of credit when the seller or telemarketer has guaranteed or represented a high likelihood of success in

[REDACTED]

obtaining or arranging a loan or other extension of credit for a person.” 16 C.F.R. § 310.4(a)(4).

18. The TSR also prohibits any seller or telemarketer from, “[d]isclosing or receiving, for consideration, unencrypted consumer account numbers for use in telemarketing.” 16 C.F.R. § 310.4(a)(5).

[REDACTED]

Defendants have been unjustly enriched as a result of their unlawful practices. Absent injunctive

[REDACTED]

relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

[REDACTED]

**THIS COURT'S POWER TO GRANT RELIEF**

22. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant

TSR by Defendants;

3. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act and the TSR, including but not limited to,