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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

FEDERAL TRADE COMMISSION

Case No.



6. Defendant **Rodolfo Garcia Rodriguez, Jr.** (“Rodriguez”) is the chief executive officer and a shareholder of defendant 9163-7710 Quebec, Inc., a Canadian corporation located in Quebec. At all times material to this complaint, acting alone or in concert with others, he has formulated, directed, controlled or participated in the acts and practices set forth in this complaint. Rodriguez transacts or has transacted business in the District of Puerto Rico.

### COMMERCE

7. At all times relevant to this complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act. 15 U.S.C. § 44.

### COURSE OF CONDUCT

8. Since at least January 2006, and continuing thereafter, Defendants have engaged in a plan, program, or campaign to deceptively sell internet business directory listing services and web page hosting services (“services”) by telephone to U.S. consumers.

9. Defendants induce consumers to pay for internet listings by calling under the pretense of renewing a local yellow pages listing. They then bill consumers without

















