




**JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction pursuant to 15 U.S.C. §§ 45(a) and 53(b), and 28 U.S.C. §§ 1331, 1337(a), and 1345.









listing, or because they believe that paying the invoice will put an end to the harassing telephone calls and mailings from Defendants' collections department.

**VIOLATIONS OF SECTION 5 OF THE FTC ACT**



