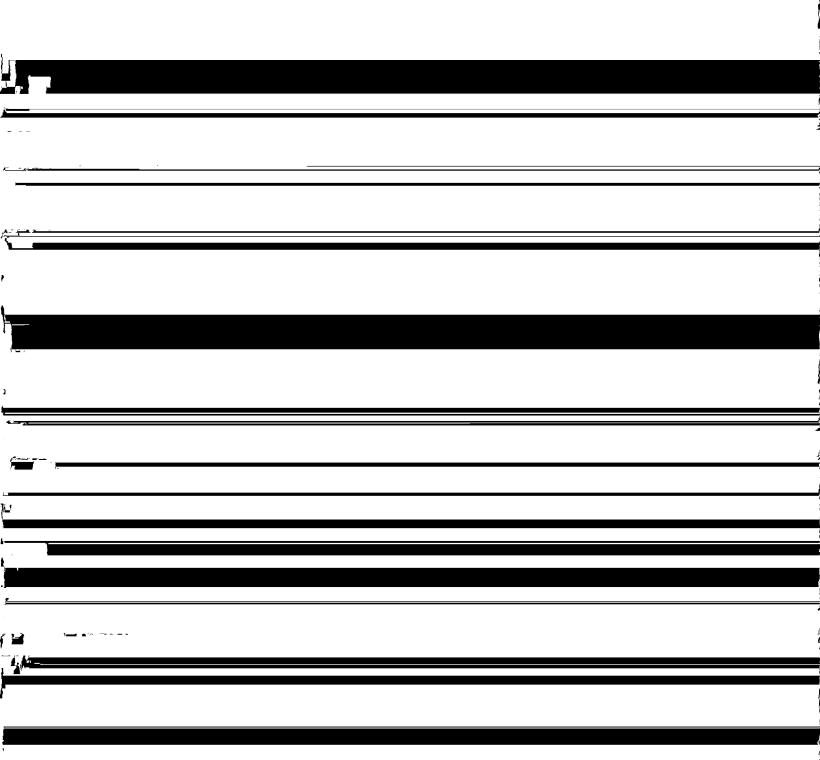
- WILLARD K. TOM 1
- General Counsel 2
- CHARLES A. HARWOOD Regional Director 3
- NADINE SAMTER, WA State Bar No. 23188 MIRY KIM, WA State Bar No. 31456 4
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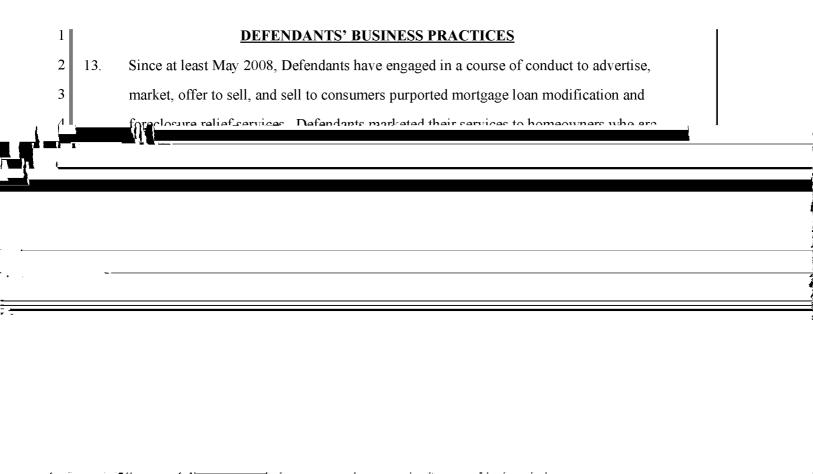


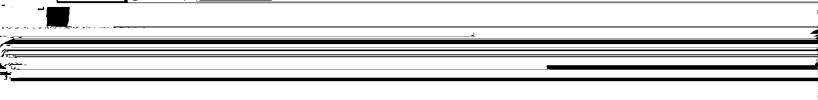
	1 2 2.	JURISDICTION AND VENUE This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and	
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2 - ~ ~ ~	4 47467 (b. 2) - 174, 51 - 194, 50		
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has formulated, directed, controlled, had the authority to control, or participated in the
acts and practices of A2S and Sleeping Giant, including the acts and practices set forth in
this Complaint. Defendant Oberholtzer resides in this district and in connection with the
matters alleged herein, transacts or has transacted business in this district and throughout
the United States.

9. Defendants A2S and Sleeping Giant (collectively, "Corporate Defendants") have
operated as a common enterprise while engaging in the deceptive acts and practices
alleged below. Defendants have conducted the business practices described below
through interrelated companies that have common ownership and office locations.
Because these Corporate Defendants have operated as a common enterprise, each of them

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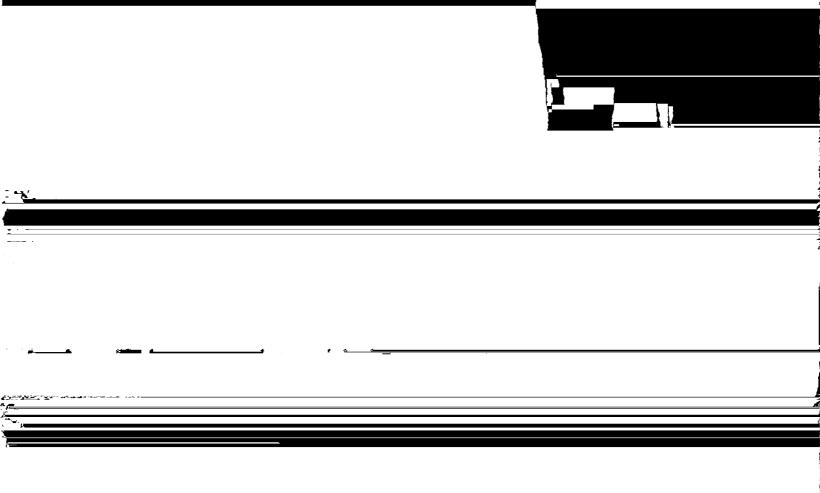


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1		your lender to get you the best possible solution to your
2		home foreclosure problem.
3	16.	Consumers spoke to Defendants' telemarketers when they called the toll-free telephone
4		number provided on Defendants' website or when Defendants called consumers after
5		receiving consumers' information via the online form.
6	17.	During the telemarketing sales calls, Defendants' representatives collected information
7		from consumers, including details about the consumers' mortgages and income. In
Q		remember instances of an accounting anamided this information the telemortestors teld

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1		COUNT I
2		Misrepresentations Regarding Loan Modification Success
3	27.	In numerous instances, in connection with the advertising, marketing, promotion,
4		offering for sale, or sale of mortgage loan modification and foreclosure relief services,
5		Defendants have represented, directly or indirectly, expressly or by implication, that
6		Defendants will obtain a mortgage loan modification or stop foreclosure in all or virtually
7		all instances.
8	28.	In truth and in fact, Defendants did not obtain a mortgage loan modification or stop
, ,		foraclessive in all or virtually all instances

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1		5(a) of the FTC Act, 15 U.S.C. § 45(a).	
2		<u>CONSUMER INJURY</u>	
3	33.	Consumers have suffered and will continue to suffer substantial injury as a result of	
4		Defendants' violations of the FTC Act. In addition, Defendants have been unjustly	
ŀ		carichal as a result of their unlauful acts ar practices - & kaset initiative satisfies this	

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1	D.	Award Plaintiff the costs of bringing	this action, as well as such other and
2		additional relief as the Court may de	termine to be just and proper.
3			
4	Dated: July 14	4, 2009	Respectfully submitted,
5			WILLARD K. TOM
6			General Counsel
7			
8 9			/s/Nadine Samter NADINE SAMTER MIRY KIM
10			Federal Trade Commission 915 Second Avenue, Suite 2896 Seattle, WA 98174
11			(206) 220-6350
12			Attorneys for Plaintiff FEDERAL TRADE COMMISSION
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