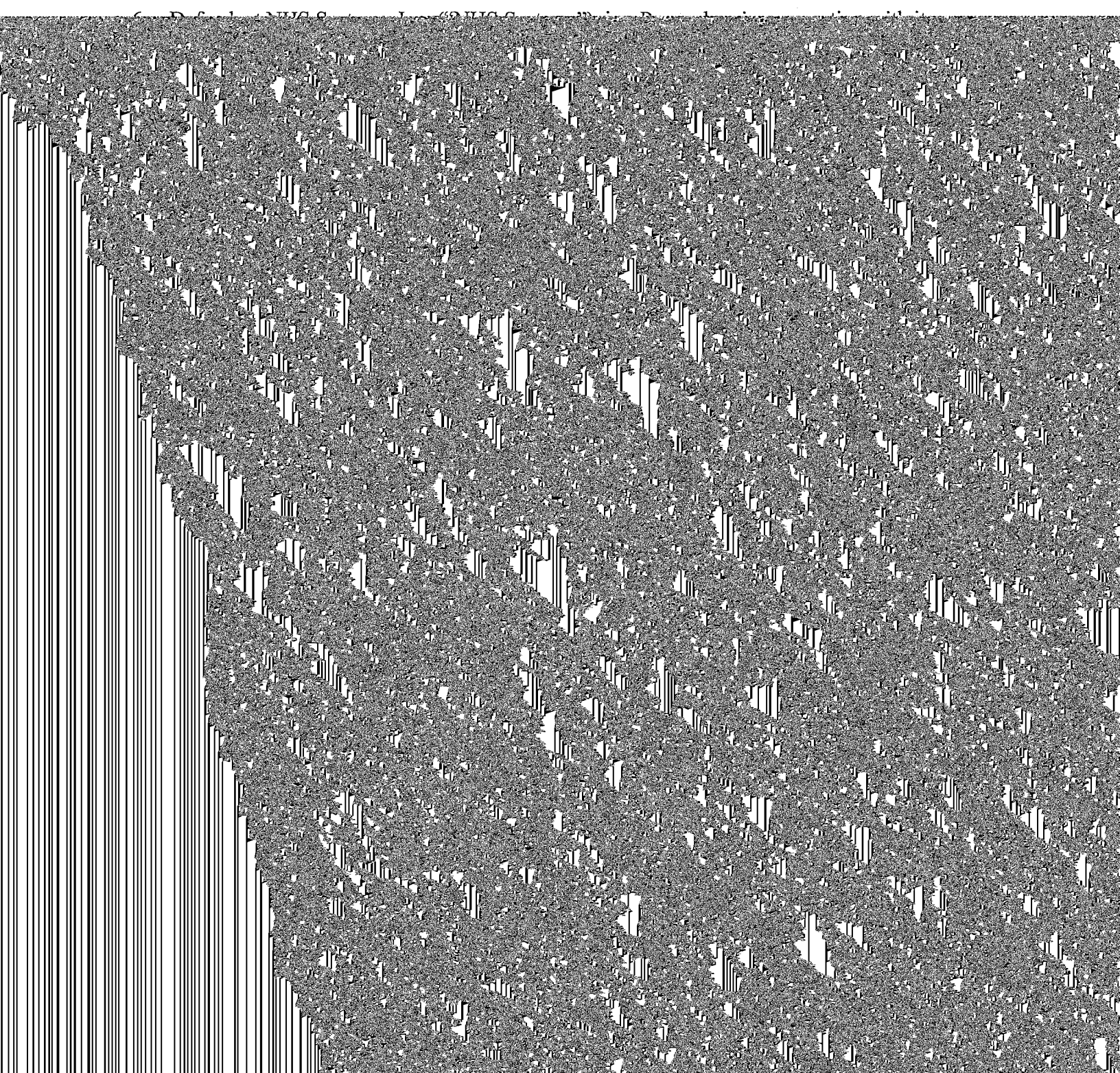


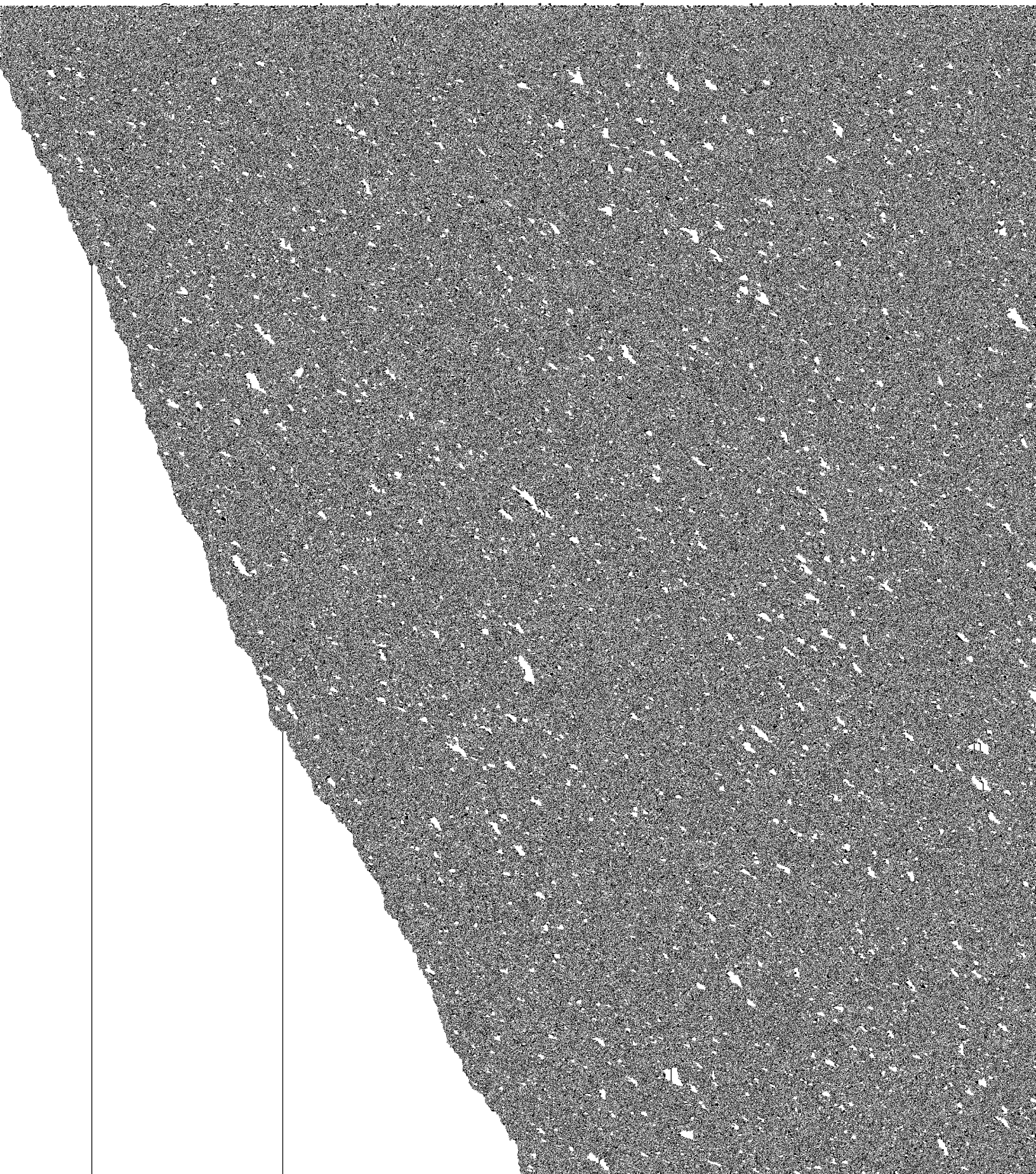
5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and the TSR, and to secure such equitable relief as may be appropriate in each case, including restitution and disgorgement. 15 U.S.C. §§ 53(b), 57b, 6102(c), and 6105(b).

**DEFENDANTS**





16. Defendant Nicole Bertrand is a resident of Quebec, Canada. She is the president of 6676529









COMMERCE





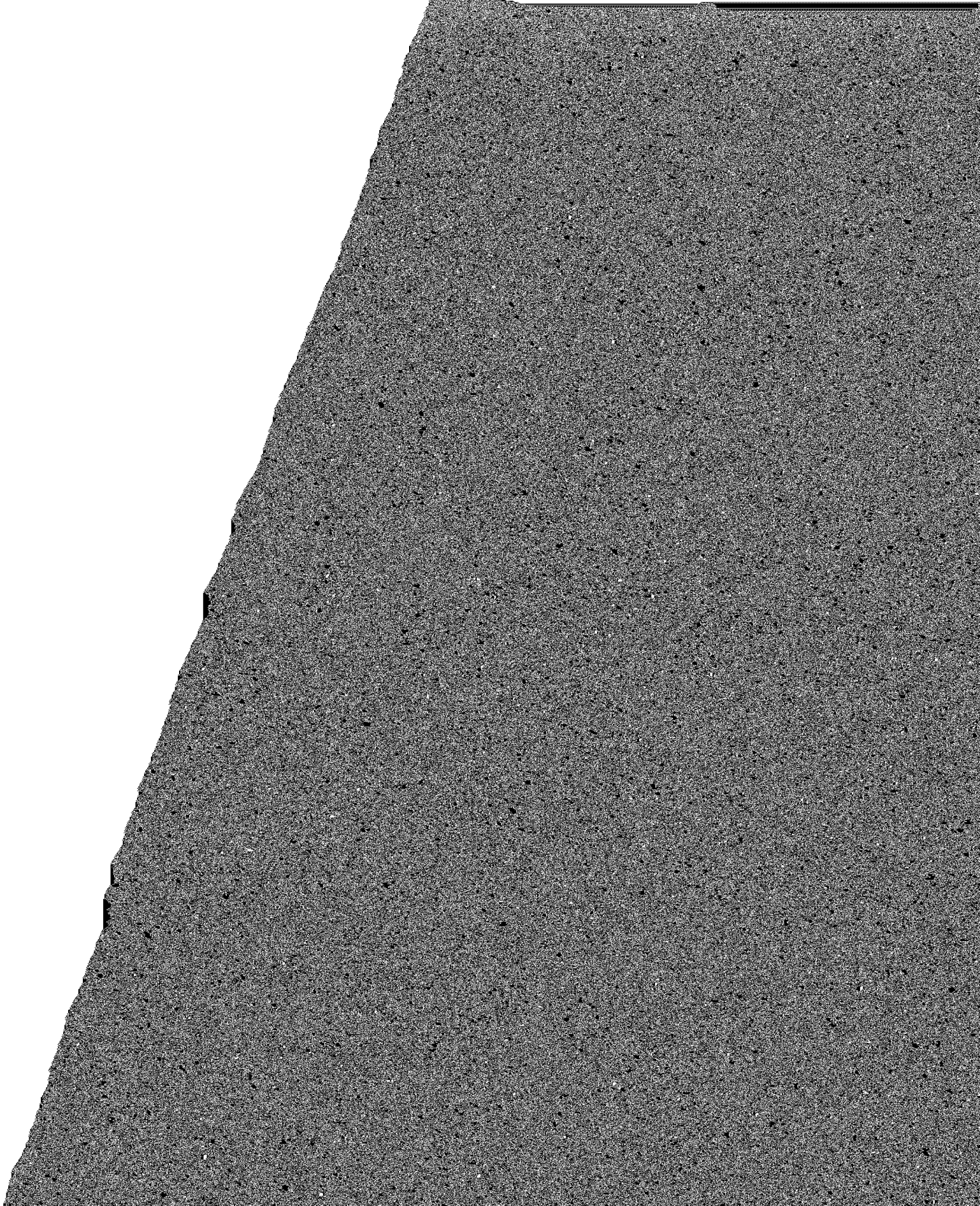
in instances where no recorded authorization was available or when the recorded authorization was in a voice that was not the consumer's.

42. In numerous instances, the NHS/PHS Corporate Defendants have charged consumers who






Count I







68. Under the TSR, "Free-to-pay conversion means, in an offer or agreement to sell or provide any goods or services, a provision under which a customer receives a product or service for







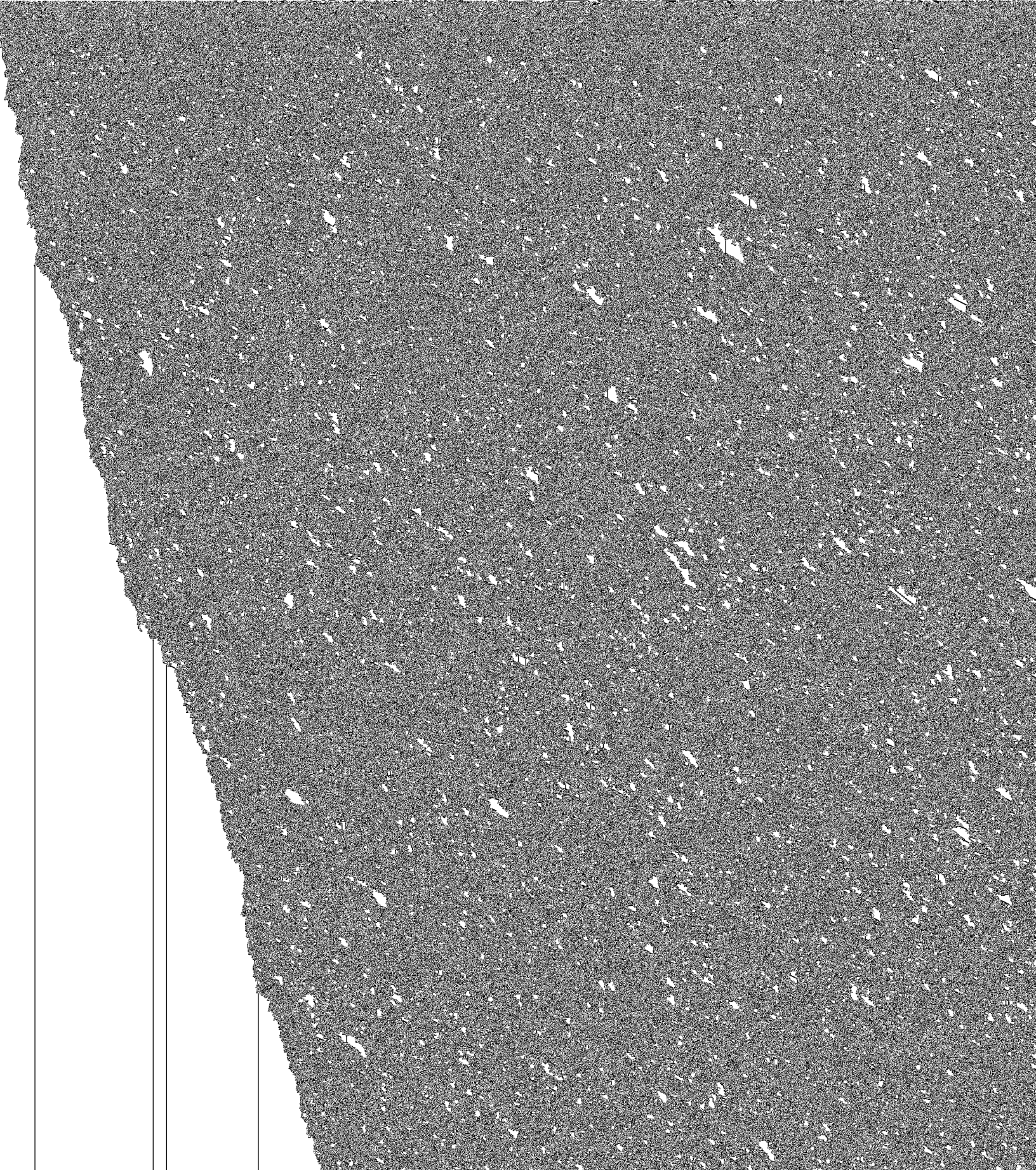








**Count XII**  
**Lack of Express Informed Consent to be Billed**



**PRAYER FOR RELIEF**

Wherefore, Plaintiff Federal Trade Commission, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, and Section 6(b) of the Telemarketing Act, 15 U.S.C.

