



Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108, to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), the Credit Repair Organizations Act, 15 U.S.C. §§ 1679-1679j, and the FTC’s “Telemarketing Sales Rule” (“TSR”), 16 C.F.R. Part 310.



reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-

gotten monies. 15 ILS C. 88-52(b), 56(a)(2)(A), (D), 57b, 167(b), 6102(a) and 6105(b)











## Mortgage Loan Modification Activities

31. Since at least January 2009, Defendants 1<sup>st</sup> Guaranty, Crossland, Stephen

















preliminary injunctions, an order freezing assets, immediate access, and the appointment of a