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UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

COMMISSIONERS:

Jon Leibowitz, Chairman

William E. Kovacic

J. Thomas Rosb

Edith Ramirez

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3. "Acquisition" means the acquisition by Fidelity of Commonwealth, Lawyers, and United (collectively, the "LFG Underwriters") from LandAm pursuant to an amended stock purchase

IX. VIOLATIONS CHARGED

15. The allegations contained in paragraphs 114 are repeated and realleged as though fully set forth here.

16. The Acquisition Agreement described in Paragraph 9 constitutes a violation of Section 5 of the FTC Act, as amended, 15 U.S.C. § 45.

17. The Acquisition described in Paragraph 9 constituted a violation of Section 7 of the Clayton Act, as amended, 15 U.S.C. § 18, and Section 5 of the FTC Act, as amended, 15 U.S.C. § 45.

WHEREFORE, THE PREMISES CONSIDERED, the Federal Trade Commission on this thirteenth day of September, 2010, issues its Complaint against said Respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL: