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Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 2 of 36 PageID #:108

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 3 of 36 PageID #:109

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 4 of 36 PageID #:110

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 5 of 36 PageID #:111

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 6 of 36 PageID #:112

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 7 of 36 PageID #:113

will not be able to collect the full amount of the taxes owed.<sup>10</sup> In order to show Doubt as to

Collectibility town must corrise the DS that the way 1d be weakle to serve ff the total tow

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 10 of 36 PageID #:116

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 11 of 36 PageID #:117

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 12 of 36 PageID #:118

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 13 of 36 PageID #:119

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 14 of 36 PageID #:120

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 15 of 36 PageID #:121

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 16 of 36 PageID #:122

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 17 of 36 PageID #:123

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 18 of 36 PageID #:124

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 19 of 36 PageID #:125

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 20 of 36 PageID #:126

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 21 of 36 PageID #:127

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 22 of 36 PageID #:128

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 23 of 36 PageID #:129

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 24 of 36 PageID #:130

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 25 of 36 PageID #:131

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 26 of 36 PageID #:132

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 27 of 36 PageID #:133

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 28 of 36 PageID #:134

## A. This Court has the Authority to Grant the Requested Relief

The FTC Act provides that "in proper cases the Commission may seek, and after proper

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proof, the court may issue, a permanent injunction." 15 U.S.C. § 53(b). Once the Commission

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 30 of 36 PageID #:136

"unfair" and also violate Section 5. Under Section 5(n) of the FTC Act, an act or practice is unfair if it causes or is likely to cause substantial injury to consumers that is not reasonably

 Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 32 of 36 PageID #:138

satisfied by a showing that the defendant (1) had actual knowledge of the decentive acts or

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 33 of 36 PageID #:139

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 34 of 36 PageID #:140

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 35 of 36 PageID #:141

Case: 1:10-cv-06123 Document #: 18 Filed: 09/24/10 Page 36 of 36 PageID #:142