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will not be able to collect the full amount of the taxes owed.[10] In order to show Doubt as to

Collectibility, taxpayers must convince the IRS that they would be unable to pay off the total tax

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

"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

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