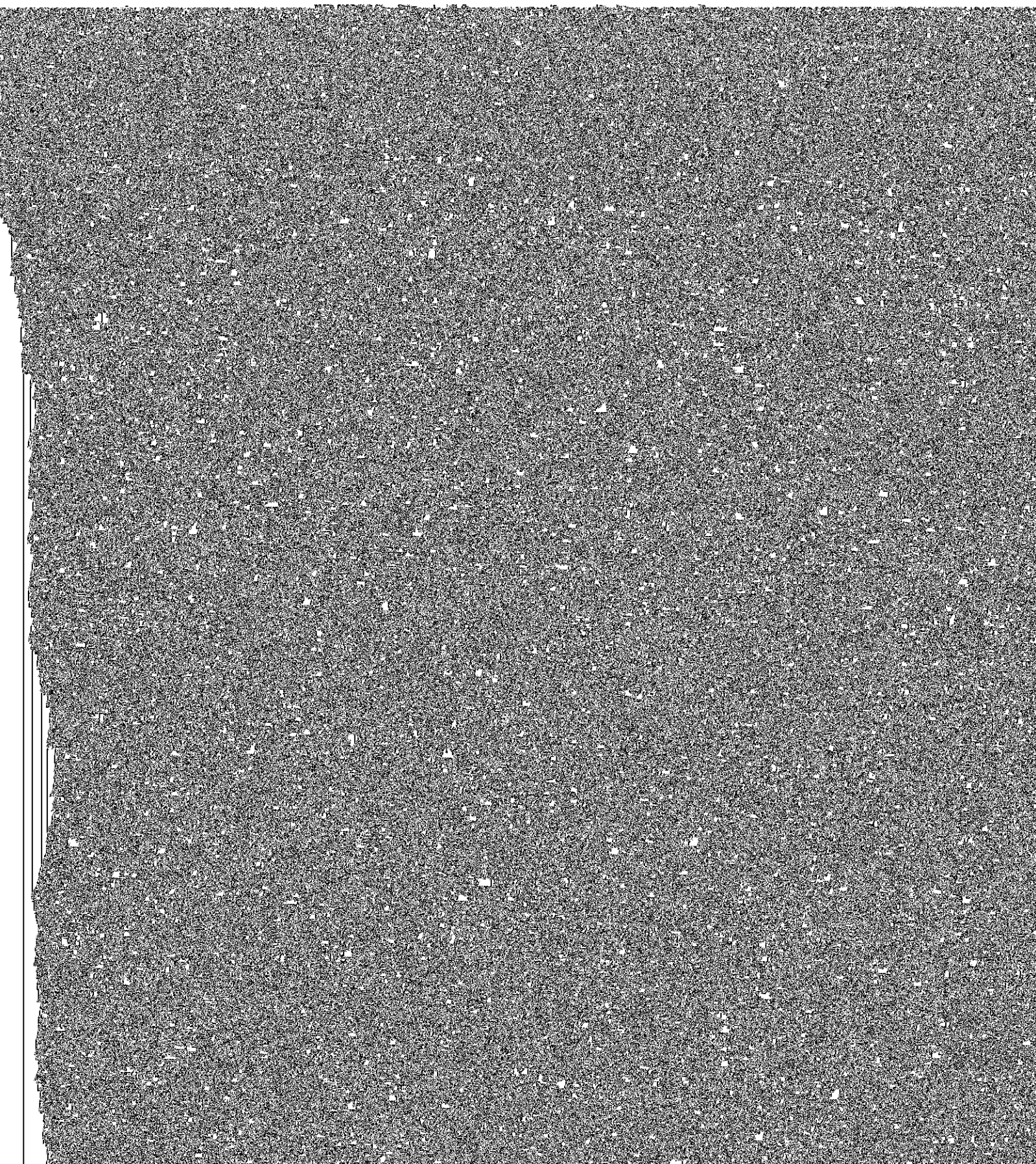


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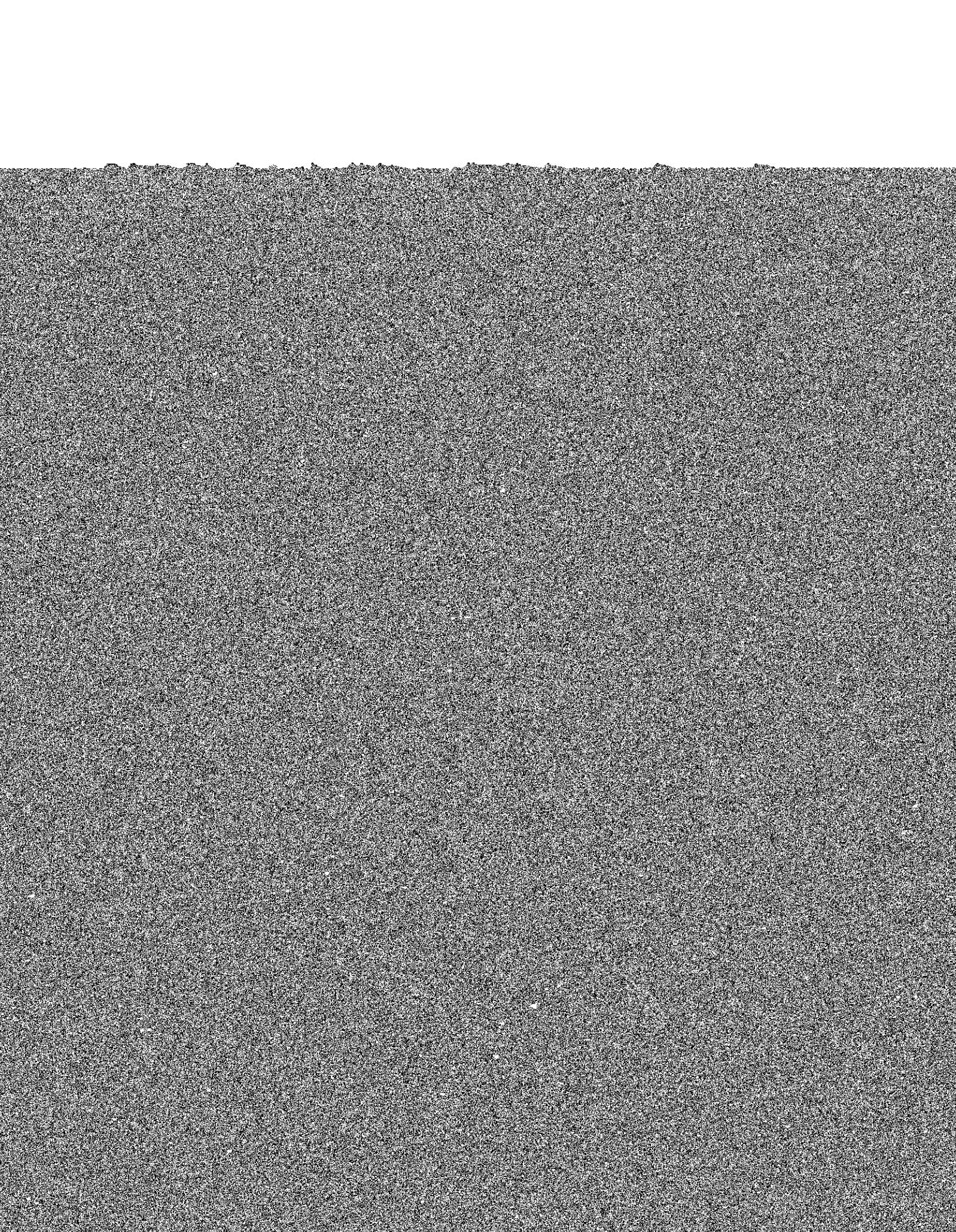


Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

Management Group Inc. transacts or has transacted business in this district and throughout the United States.

10. Defendant David D. Richards ("Richards") is an officer and/or director of





28. In numerous instances, Defendants, acting directly or through one or more intermediaries, have initiated telemarketing calls that failed to disclose truthfully, promptly, and in a clear and conspicuous manner to the person receiving the call: the identity of the seller; that the purpose of the call is to sell goods or services; or the nature of the goods or services. In numerous instances since December 1, 2008, Defendants, acting directly or through one or more intermediaries, have initiated prerecorded telemarketing calls to consumers that failed to make such disclosures promptly

COUNT SIX

Failing to Make Required Oral Disclosures

52 In numerous instances, in the course of telemarketing goods and services

59. Section 19 of the FTC Act, 15 U.S.C. § 57b, and Section 6(b) of the Telemarketing Act, 15 U.S.C. § 6105(b), authorize this Court to grant such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the TSR, including the rescission or reformation of contracts, and the refund of money.

PRAYER FOR RELIEF

Wherefore, Plaintiff FTC, pursuant to Sections 13(b) and 19 of the FTC Act, 15

