

At all times relevant to this Complaint, WAM has transacted business in the

inconvenient for consumers to receive calls at these times.

18 In numerous instances, WAM collectors call consumers at their places



22. WAM's debt collection practices have generated thousands of complaints filed with the Federal Trade Commission, Better Business Bureaus,

response of such person was erroneous or incomplete and that

COUNT X

49. In numerous instances, in connection with the collection of debts,

Defendant, directly or indirectly, exercised control of the natural resources of



**EQUITABLE RELIEF FOR VIOLATIONS OF
THE FTC ACT AND THE FDCPA**

52 Under Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), this Court is



4. Award Plaintiff monetary civil penalties against Defendant WAM for

violation of 54 USC 55205(a)(5)

