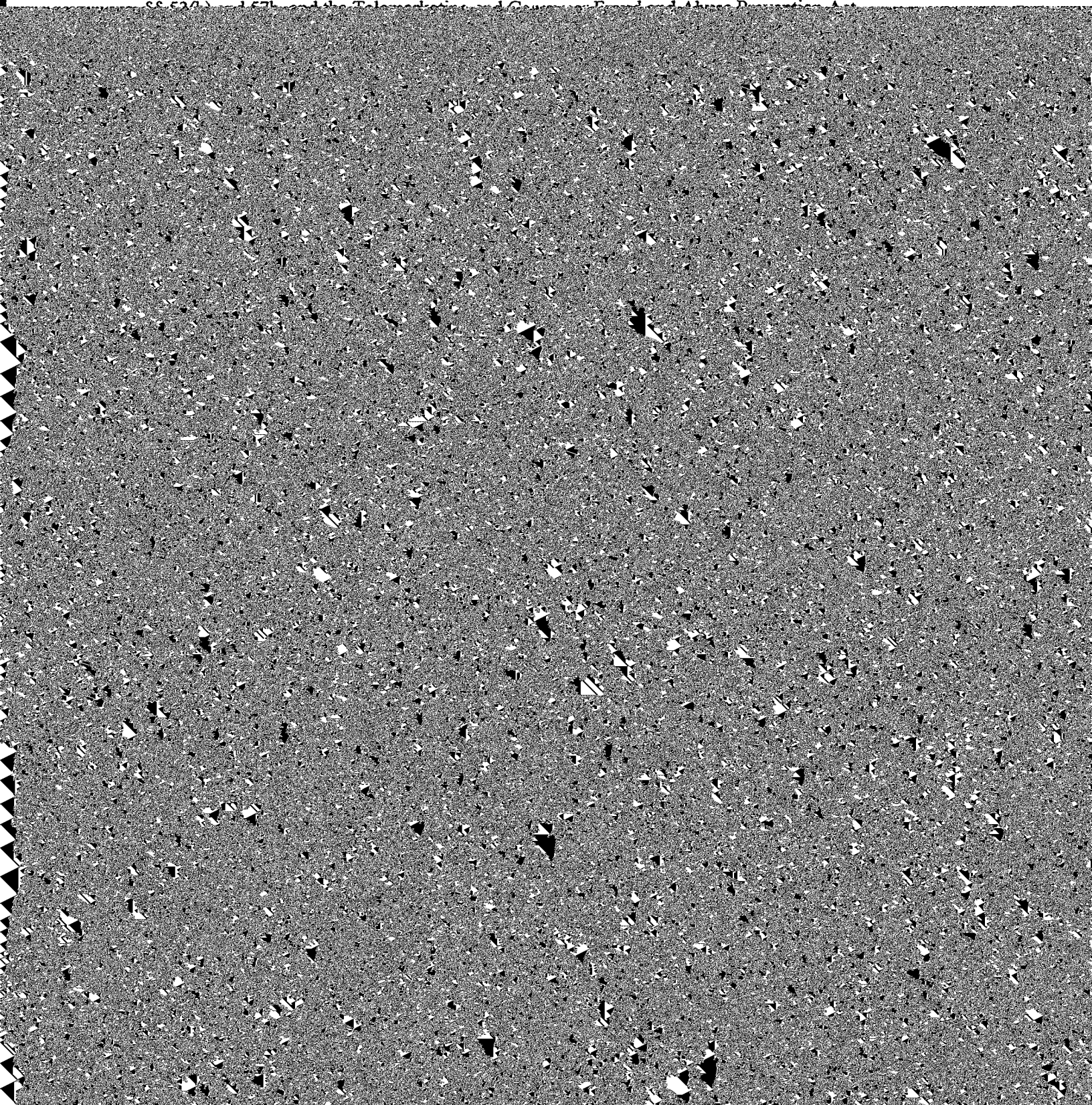
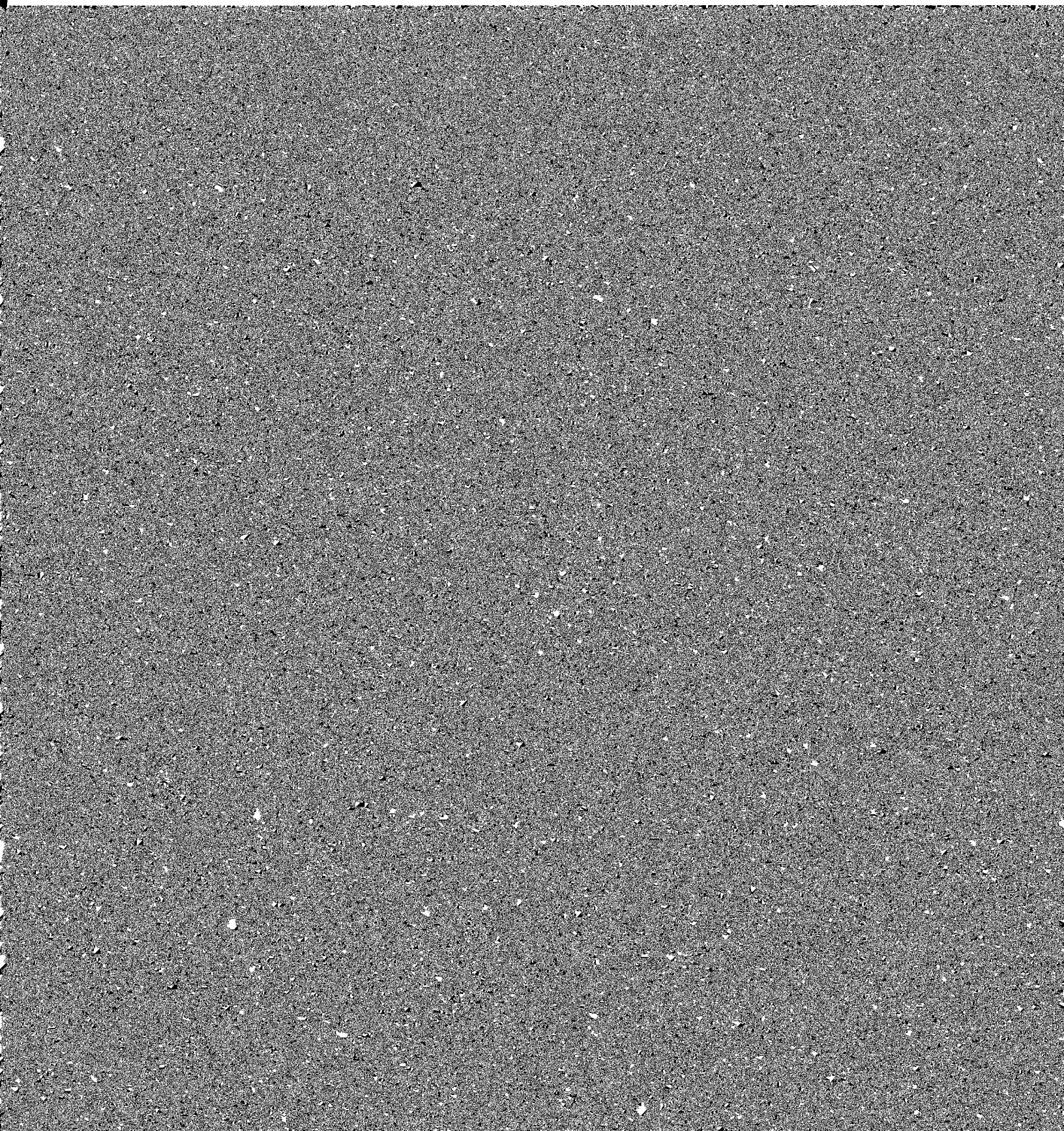
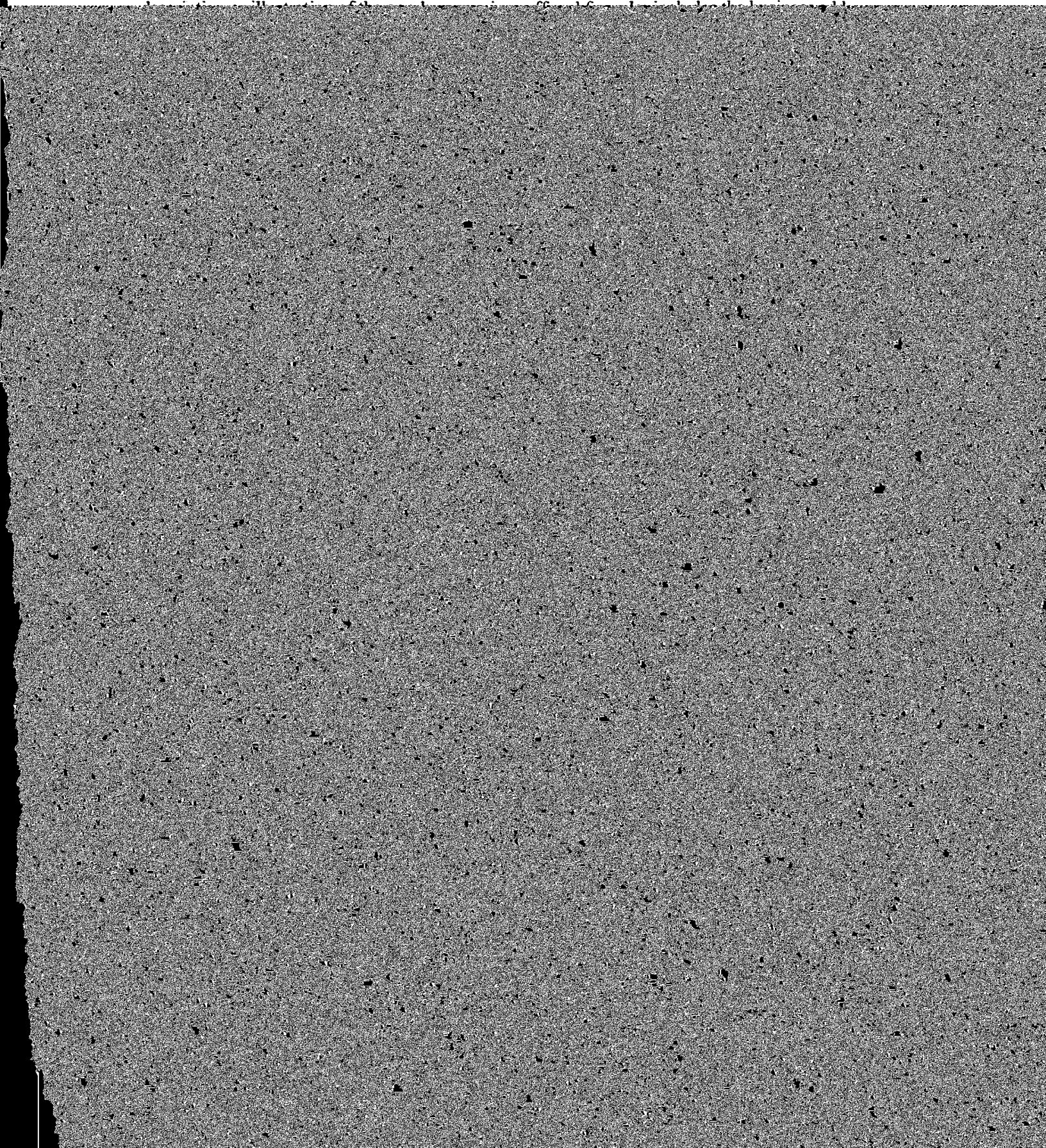
Plaintiff Federal Trade Commission ("FTC" or "Commission") commenced this action by filing its Complaint for Permanent Injunction and Other Equitable Relief ("Complaint"), pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C.



14. **"Material"** means likely to affect a person's choice of, or conduct regarding, goods or services.



include the solicitation of sales through the mailing of a catalog which: contains a written