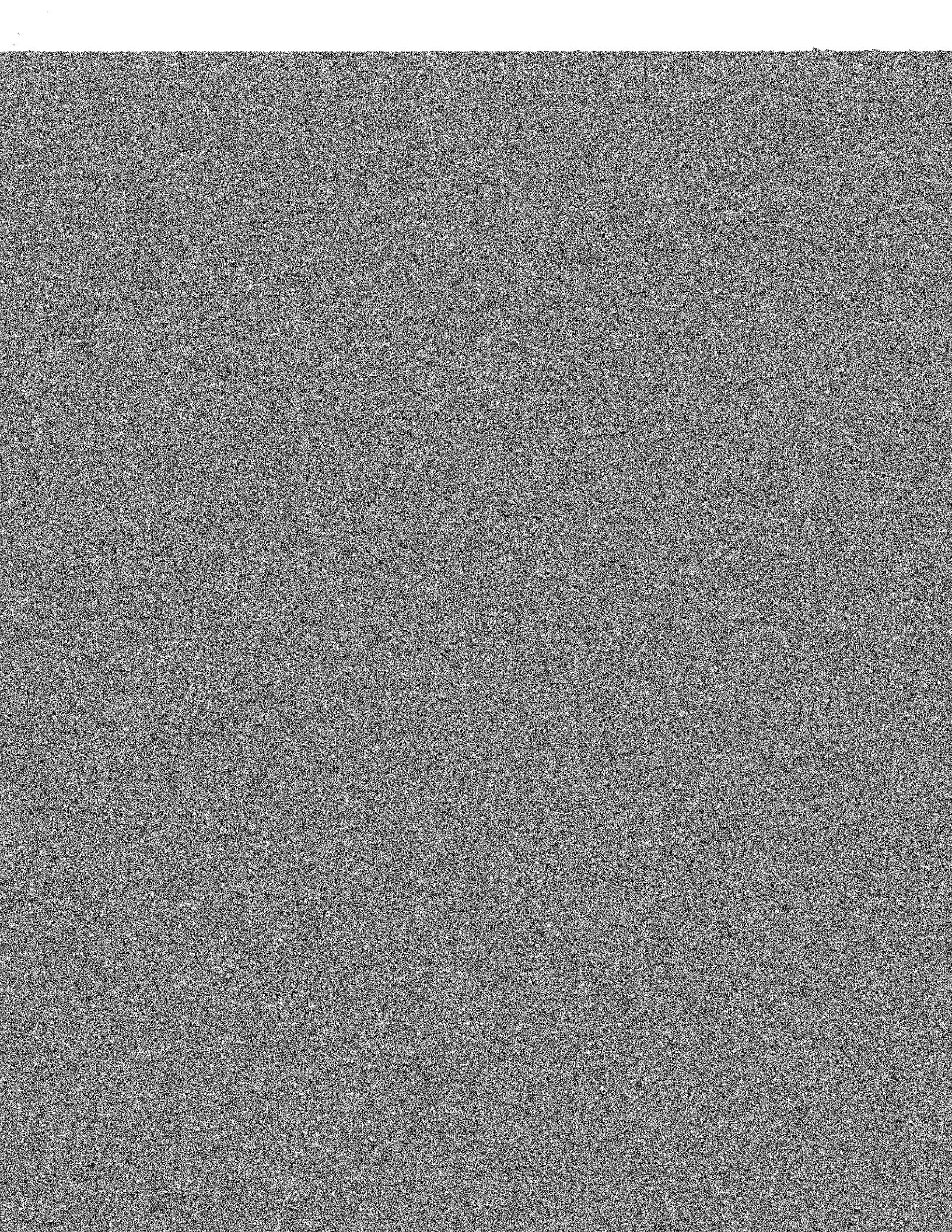


had the authority to control, or participated in the acts and practices of the Corporate Defendants that constitute the common enterprise.

COMMERCE

10. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act.



harassment. Generally, consumers make these payments using credit or debit cards.

- (f) Defendants can or will take formal legal action against a consumer who fails to pay, such as filing suit.

26 In truth and in fact, in various instances in which Defendants have made the

