RECEIVED

The front of the envelope states: “Trade Show Documents included.” The return address

year contract. Often, receipt of this invoice is a consumer's first indication that the form they signed was not merely to update an existing listing. Consumers are directed to wire their payment directly to Defendants' account at a Slovakian bank,[15]

[redacted]

such a listing.[21]

IV. **ARGUMENT**

Defendants likely have tricked consumers out of millions of dollars with their deceptive

[redacted]

3. Valvoda and Anhorn are Individually Liable Under the FTC Act.

Defendants Valvoda and Anhorn are responsible for the deceptive practices of Construct Data, and therefore should be subject to the temporary restraining order and an asset freeze. An

[redacted]