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Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108, to secure preliminary and permanent injunctive relief, restitution, rescission or reformation of contracts, disgorgement, and other equitable relief for Defendants’ deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the FTC’s Trade Regulation Rule entitled “Telemarketing Sales Rule” (the “Telemarketing Sales Rule”)

16 C.F.R. Part 310.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 15 U.S.C. §§ 45(a),

DEFENDANTS

5. Defendant **James Shovak** is an officer, or has held himself out as an officer, of Star Credit Services. At all times material to this complaint, acting alone or in concert with others, he has formulated, directed, controlled, or participated in the operation of

[REDACTED]

Star Credit Services has been helping people get loans and lines of credit

12. After consumers pay the fee, Defendants send them a packet of materials providing details on the list of lenders and Defendants instruct consumers to apply for loans or lines credit.

13. Consumers have found that the list of lenders provided by Defendants

VIOLATIONS OF SECTION 5 OF THE FTC ACT

15. Section 5(a) of the FTC Act 15 U.S.C. § 45(a) [REDACTED]

[REDACTED]

22. Therefore, the representation set forth in Paragraph 20 is false.

[The remainder of the page is heavily redacted with multiple thick black horizontal bars.]

COUNT FIVE

33. In numerous instances, in connection with telemarketing offers to arrange
for extensions of credit Defendants have misrepresented material aspects of the nature

