Plaintiffs, the Federal Trade Commission ("FTC" or "Commission"), and the State of

Florida, for their Complaint allege:

Hinds incorporated Defendant YYP through the Florida Department of State, Division of



COUNT II

(By Plaintiff FTC)

38. In numerous instances in connection with the marketing, promotion, offering for sale, or sale of business directory listings, Defendants have represented, directly or indirectly,

preserve the possibility of effective final relief, including but not limited to, temporary and preliminary injunctions and an order freezing assets: