UNITED STATES DISTRICT COURT WESTERN DISTRICT OF OKLAHOMA OKLAHOMA CITY DIVISION

FEDERAL TRADE COMMISSION,

CIV-14-786-D

Plaintiff,

٧.

YOUR YELLOW BOOK INC, a corporation, also d/b/a/ YOUR YELLOW BOOK,

BRANDIE MICHELLE LAW, individually and as an officer of YOUR YELLOW BOOK INC,

DUSTIN R. LAW, individually and as an officer of YOUR YELLOW BOOK INC, and

ROBERT RAY LAW, individually and as an officer of YOUR YELLOW BOOK INC.

Defendants.

The FTC brings this action under Sec

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

3. Venue is proper in this district under 28 U.S.C. § 1391(b)(1) and (2), (c)(1) and (2), and (d), and 15 U.S.C. § 53(b).

4.

transacted business in this district and throughout the United States. At all times material to this Complaint, YYB deceptively sold Internet business-directory services to a variety

the United States.

4 of the FTC Act, 15 U.S.C. § 44.

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11. Since at least 2011, Defendants have engaged in a plan, program, or campaign to deceptively sell Internet business-directory listings throughout the United States.

scheme generated more than 160 consumer complaints to the FTC and the Better

Business Bureau and caused hundreds of thousands of dollars in consumer losses.

12. Defendants market their business-directory listings by faxing or mailing documents to consumers with whom they have no preexisting relationship. The documents prominently display the well- a symbol commonly associated with established Yellow Page directories. Typically, documents state that YYB provides I

The documents also ask

Internet business-directory.

13. documents resemble invoices and include the cost of a directory listing, which typically is \$487 per year. The documents direct consumers to mail their check or credit card payment information to YYB at a post office box in

Oklahoma City, Oklahoma.

14. In numerous instances, after sending these documents, Defendants place unsolicited outbound telephone calls to consumers. During these calls, Defendants represent, expressly or by implication, that consumers previously authorized or agreed to pay for the business-directory listings and that consumers must pay YYB

15.

Internet business

directory. Many consumers also reasonably believe that someone else in their organizations previously authorized the listings or agreed to pay for the listings and that documents are invoices for Yellow Pages directory listings that require payment.

- 16. In numerous instances, consumers ignore or otherwise refuse to pay invoices because the business-directory listing was never ordered or authorized by anyone in the sorganization. In many of those instances, Defendants continue to make multiple collection calls to the consumers. In other instances, Defendants tell consumers that they will have to pay a cancelation fee to cancel their listings.
- 17. In numerous instances, the documents Defendants send to consumers boast

 Internet business directory listings provide increased Internet exposure for
 the consumers on search engines like Google, Yahoo, and Bing. However,

 Internet directory listings do not provide such exposure for

Internet business directory is difficult to find

and navigate.

	18.	YYB received two previous cease-and-desist orders from	the U.S. Postal
Inspe	ction S	Service . T	he first order,
issued August 3, 2011, was signed by Defendant Brandie Law on behalf of YYB. The			
secor	nd, issue	ued	
Desp	ite rece	eiving these two cease-and-desist orders, YYB continues to	engage in these

illegal activities.

19. Consumers have suffered and will continue to suffer substantial injury as a and attempting to collect on deceptive invoices for worthless Internet business-directory listings that consumers have not authorized and do not want or need.

20.

21. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

22. In numerous instances in connection with the marketing, promotion, offering for sale, or sale of Internet

represented, directly or indirectly, expressly or by implication, that consumers have a preexisting business relationship with Defendants.

23. In truth and in fact, in numerous instances in which Defendants have made the representation set forth in Paragraph 22 of this Complaint, consumers do not have a preexisting business relationship with Defendants.

24. 22 of this

Complaint is false and misleading and constitutes a deceptive act or practice in violation of Section 5(a) of tther this 21/45/dtl. \$3.00.0§ 145/da 1 genda \$45(a).

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- 28. In numerous instances in connection with the marketing, promotion, offering for sale, or sale of Internet business-directory listings, Defendants have represented, directly or indirectly, expressly or by implication, that consumers owe Internet business directory.
- 29. In truth and in fact, in numerous instances in which Defendants have made the representation set forth in Paragraph 28 of this Complaint, consumers do not owe Internet business directory.
- 30. 28 of this Complaint is false and misleading and constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).
- 31. Consumers have suffered and will continue to suffer substantial injury as a In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

32. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the

exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. §

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