



**JURISDICTION AND VENUE**

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), 53(b), 57b, 6102(c), and 6105(b).

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

**SUMMARY OF THE CASE**

4. Defendants telemarket purported recovery services to consumers claiming that Defendants will collect the funds that consumers owe them.



















