

Handwritten initials and date: 6/2/16

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

Case No. 8:16-cv-01435-MSS-AAS

FEDERAL TRADE COMMISSION

Plaintiff,

v.

D & S MARKETING

also d/b/a US Corporation,
Office of Compliance and Safety Standards, and
Occupational Safety and Health
Administration, a Florida limited liability
company; and

SEAN K. JUHL, individually, an owner,
officer, or manager of D & S MARKETING
SOLUTIONS LLC;

Defendants.

FILED UNDER SEAL

PLAINTIFF FEDERAL TRADE COMMISSION
FOR PERMANENT INJUNCTIVE RELIEF

Plaintiff, the Federal Trade Commission ("FTC"), for its Complaint alleges:

1. The FTC brings this action under Sections 12(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 52(b), to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the disgorgement of

W.V


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- C. Award such relief as the Court finds necessary to redress injury to consumers resulting to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and
- D. Award Plaintiff FTC the additional relief as the Court may determine to be just and proper.

Respectfully submitted,

DAVID C. SHONKA
Attorney General Counsel

Dated: 6/2/16


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ATTEST FOR PLAINTIFF
FEDERAL TRADE COMMISSION