

FILED

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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FILED 11/13/21
ORLANDO, FLORIDA

FEDERAL TRADE COMMISSION

Plaintiff,

Case No. 19-cv-1078-AP-ADPH

v.

FIRST CHOICE HORIZON LLC,
limited liability company,

FIRST UNITED MUTUAL LLC,
limited liability company,

FIRST UNITED MUTUAL LLC,
limited liability company,

COMPLAINT FOR RE
EQUITABLE

PREMIER UNION TRUST LLC, also dba
SECOND CHOICE HORIZON, a Florida
liability company,

SOUTH PREMIER TRUST LLC,
limited liability company,

SOUTH PREMIER TRUST LLC,
liability company,

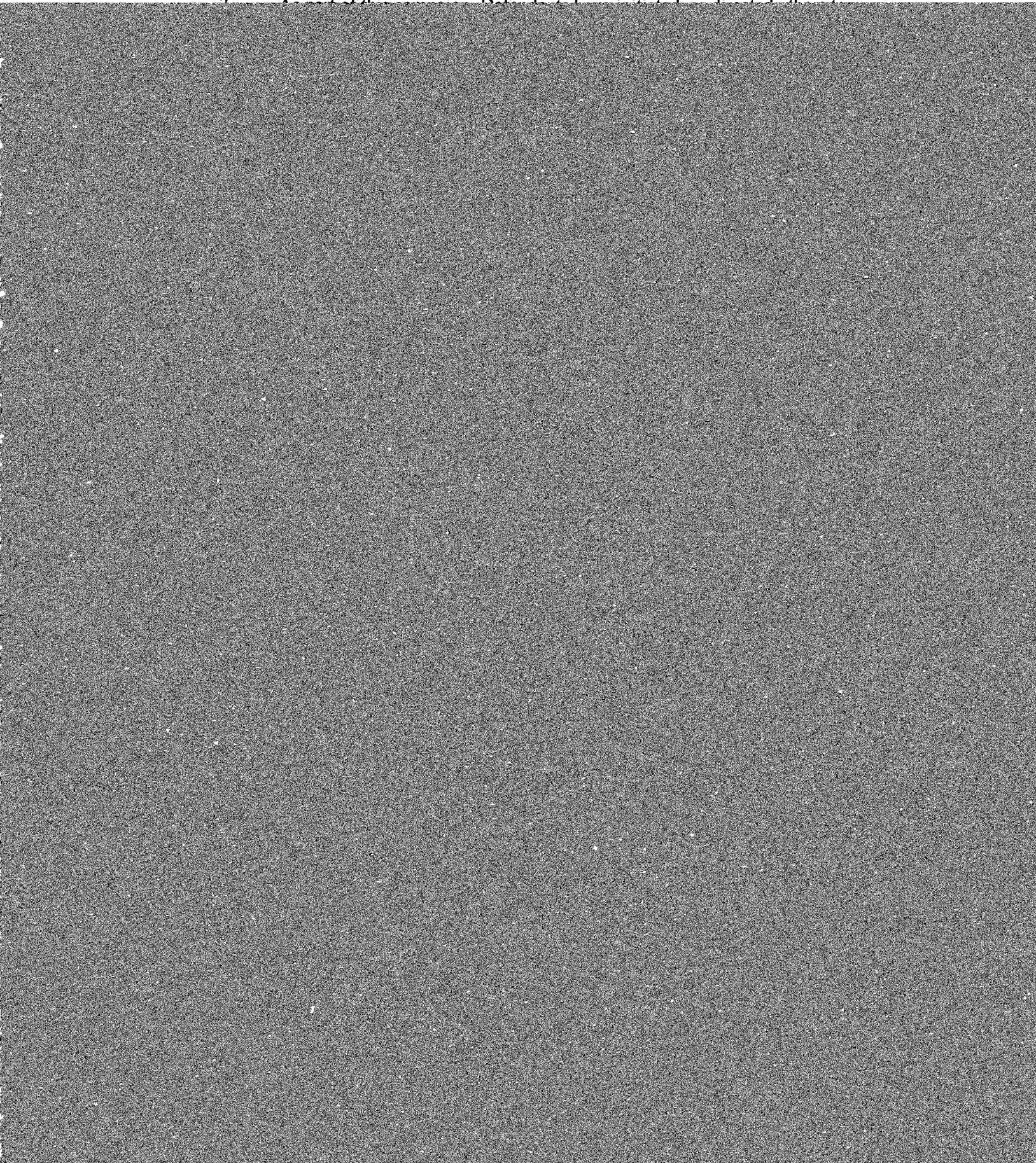
RAYMOND GONZALEZ,
member, manager, or owner of
HORIZON LLC,

CARLOS S. GUERRERO, a/k/a Carlos Sinencio
Guerrero, also CSC SOLUTIONS LLC,
individually, and as a member, manager, or
owner of FIRST CHOICE HORIZON LLC,
and FIRST UNITED MUTUAL LLC, and

JOSHUA HERNANDEZ DE ZARATE,
member, manager, or owner of SOUTH
PREMIER TRUST LLC,

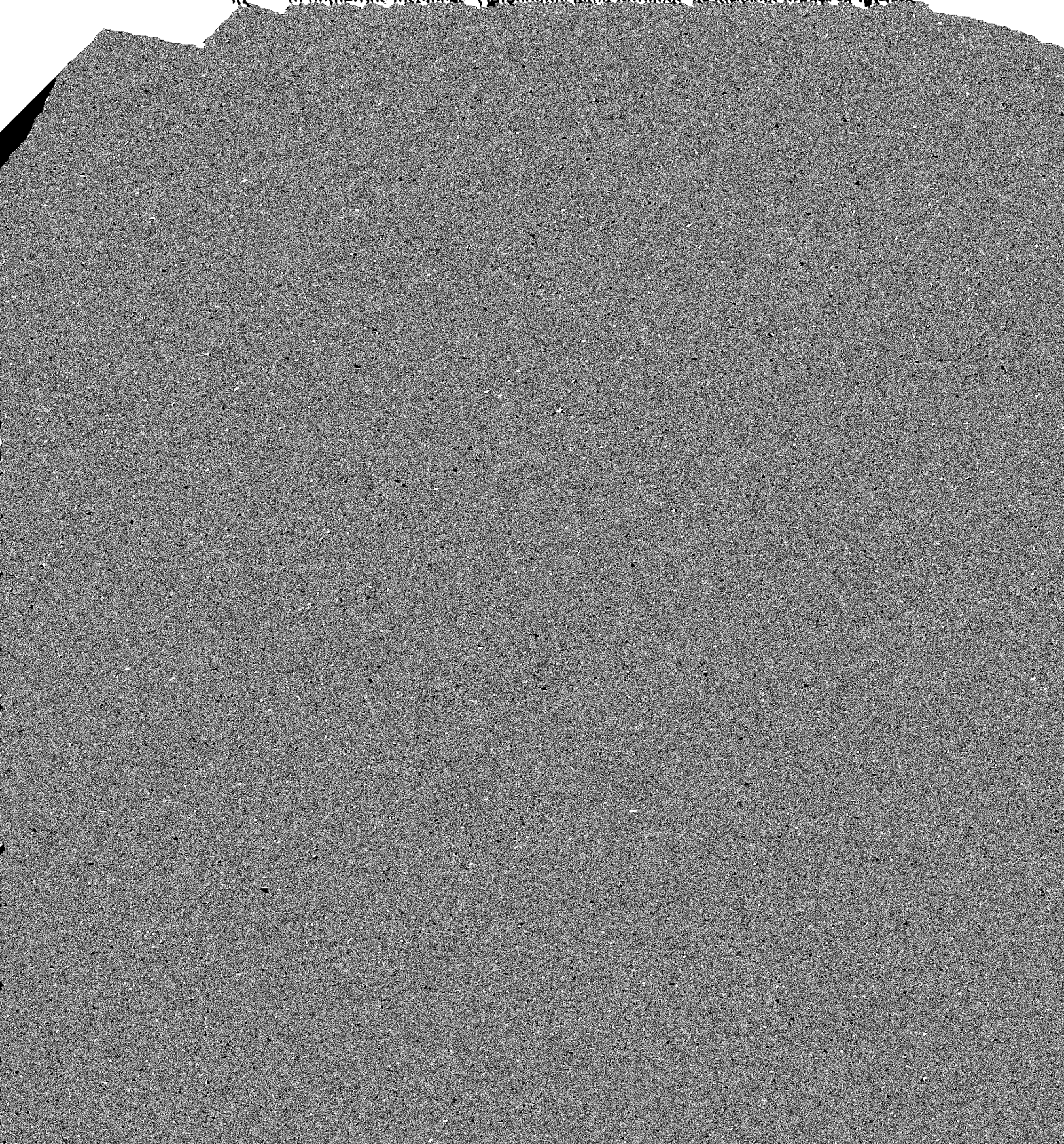
Defendants.

S-1



Defendants' Telemarketing Campaign

30. In numerous instances, Defendants have initiated, or directed others to initiate,



(E) The customer's name;

(F) The customer's billing information, identified with sufficient



of monies paid, and the [REDACTED]

D. Award Plaintiff [REDACTED]

addition [REDACTED]

Date: 1/12/2018

ALDEN F. ABDOU
General Counsel

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Attn: [REDACTED]
FEDERAL TRADE COMMISSION