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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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FEDERAL TRADE COMMISSION,

and

STATE OF MINNESOTA, by its  
Attorney General, Keith Ellison,

Plaintiffs,

v.

MANHATTAN BEACH  
VENTURE, LLC, a limited liability

3ODLQWLII WKHR PPGEMUDRQ7U<sup>3</sup> & BFP&VDQ<sup>3</sup> RU <sup>3</sup>)  
3ODLQWLII WKH 0L\*EQHVBVD<sup>3</sup> \$W\$RQ\QFFBODHEWLYIH  
ILOHG WKHLU &RPSODLQWXEQJWBLRUEPDQGHZWLKHU (T>

0%9 'HIHQGDQWVP ZDKLW DQHF PDL KDYH XQ  
(TXDO \$FFHVV WR8-~~X~~V&WLFH \$FWRQB R V Q E Q W L R K H R S  
DFWLRQ WKURXJKGMKH ~~G~~Q~~G~~W~~B~~JUHNZKQ~~R~~REHWDU DQKGLU  
DWWRUQH\ IHHV

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SURYLVLRQ RI DQ~~P~~DD~~G~~Y~~M~~UL~~Q~~U~~V~~LD~~Q~~W~~D~~IR~~U~~LD~~I~~OO~~H~~LS~~K~~F~~R~~Q~~I~~GLV  
VFULSW GLUHFWUP~~V~~K~~G~~GR~~O~~L~~E~~Q~~W~~L~~M~~I~~W~~Q~~R~~E~~D~~Q~~H~~,~~R~~W  
ZHEVLWH HPH~~D~~Q~~F~~W~~R~~UR~~Q~~L~~K~~FR~~P~~PPXQLFDWLRQ

IRUPXODWLQJURDUSDRYLGLQRURWKH IRUPXC  
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SD\PHQWV RU IHRVQ RZRI @ E\HDF XSHUGR W RLO RHUF & H E Q  
FROOHFWRU

F REWDLQ DQ\ IRUEHDUDQFH RU PRGLILF  
SD\PHQWV IURP XQVNFHXHGGKROGNUPRUWWJDU ML FORU  
GHEW RU REOLJDWLRQ

G QHJRWLDWH REWDLQVQHQRVLRDQURDQPKH S  
ZLWKLQ ZKLFK D SHUKIRQ PDKHLU GMDJXHW ORDQK G  
RU REOLJDWLRQRULKHWHREUWJDUHREORDJOWG R QW L  
UHGHP D GZHOOLQDORUR B WLYH UHFWRQDEWHDQV W DJW I  
PRUWJDJH ORDQLRQHEW URIGRHEPDUWROODQJHBDOR

H REWDLQ DQFZIDHYDUWRROCFDPKQW RU  
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RWKHU ZLVH FRQ Q H B W U H V G R W R J R Q Y H B O K H I Q O V R B O S W L R W L V  
RWKHU QRQFRPPHRUF LDDO & WRKJLUD BURJUDP

& WKH QDWXU H W H R S C H U R W L I V D R C E S Z H V A C H O R Y L G H V  
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RU SDUWLFLSDWER Q K Z L W K F D Q Y R I D W K L X D O U G R W L Z K H

DFWLQJ GLUHFV Q O F R Q Q I H Q G M L L R H F W I O V K Q V K I F L V D O B I U R I G  
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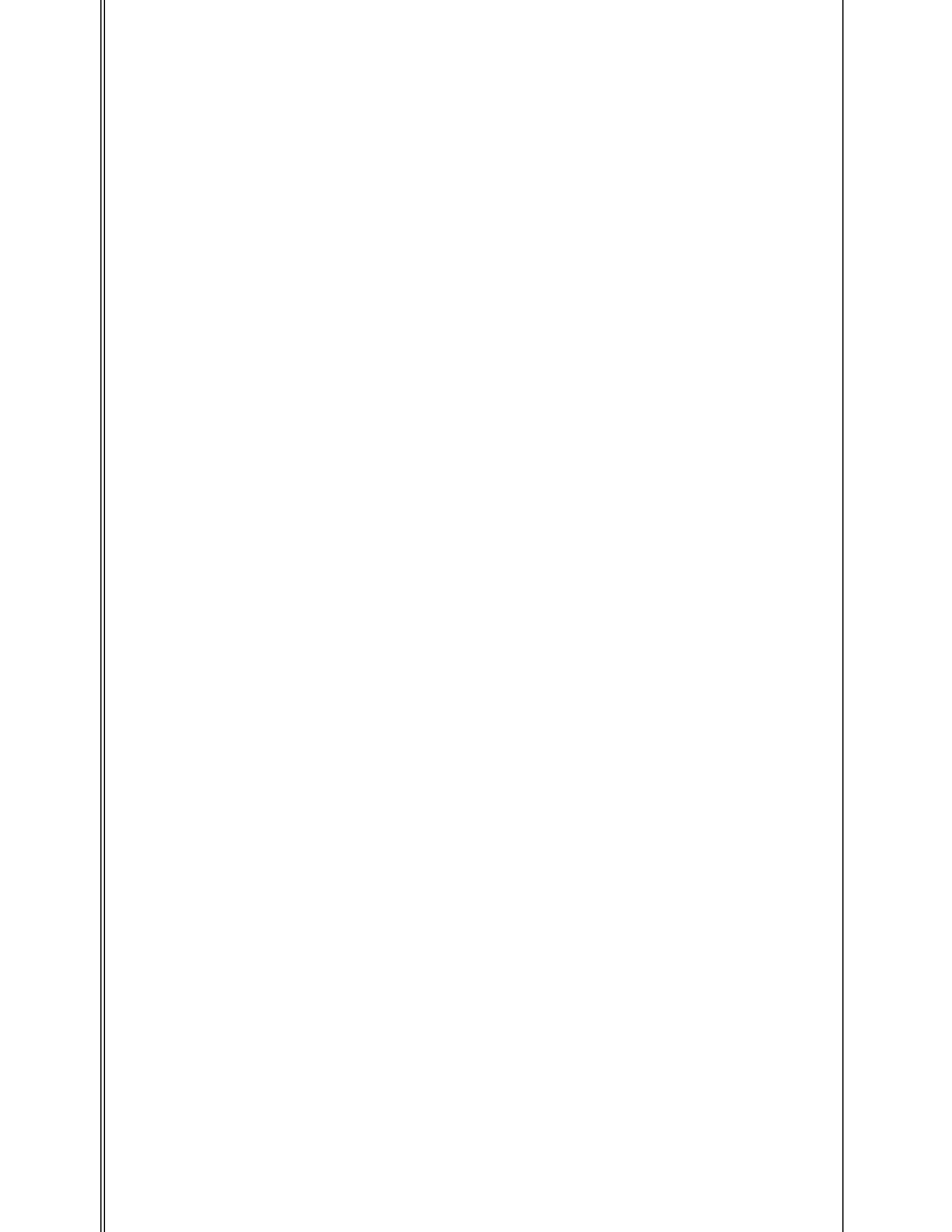
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5HSUHVHQWDLRQW '&RVPXFLPLWLW BGD QGH WKH H 01 \$\*  
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GRFXPHQWV FROJLQDQ I E Y L B O \ 5 P / S H B O W Q M G W L R Q W K H  
&RPPLVLRQ DQG KWKH GR \$ XPHQWV LQFOXGH  
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<sup>3</sup>)7 & )LQDQFLDO FL & R O S O V X W H G R S G I ' V L J Q H G  
&KULVWRSKHU \HOO R Q Q H E X & D Q J D W W D F K P  
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\HOO <sup>3</sup>)7 & )LQ D Q F U L D O R F L & R O S O H W H G 8 S G D V  
S G I ' Z H Q F G D Q W \ ) H Q O V W H D Q M R W R  
LQFOXGLQJ DWWDFKPHQWV DQG  
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FRXQVHO -R K Q - D F R E I O O V Z L ' W K H Q G E B Q W X E M H F V  
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+ 7 K H V X V S H Q V L R Q Z L I O W K E I H M O X I G J P M Q D H O O R I '  
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 PDGH ZLWKLQ GADKLVVR 2UHQWUE R HDQVFWWRQL D FIFRUG  
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 . 3ODLQWLIIV† DVXVSHQVLRQWRRIWKKM MXGJPH  
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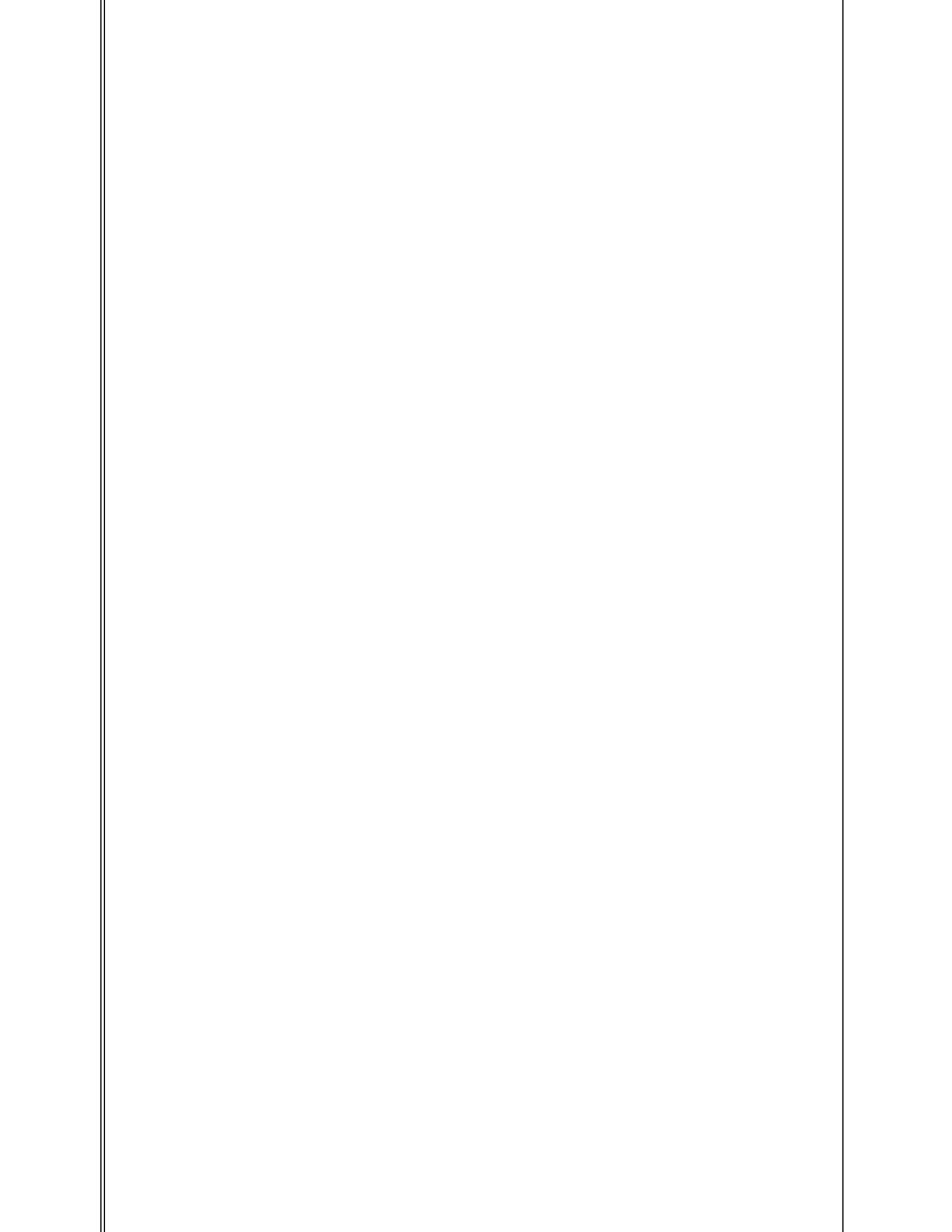
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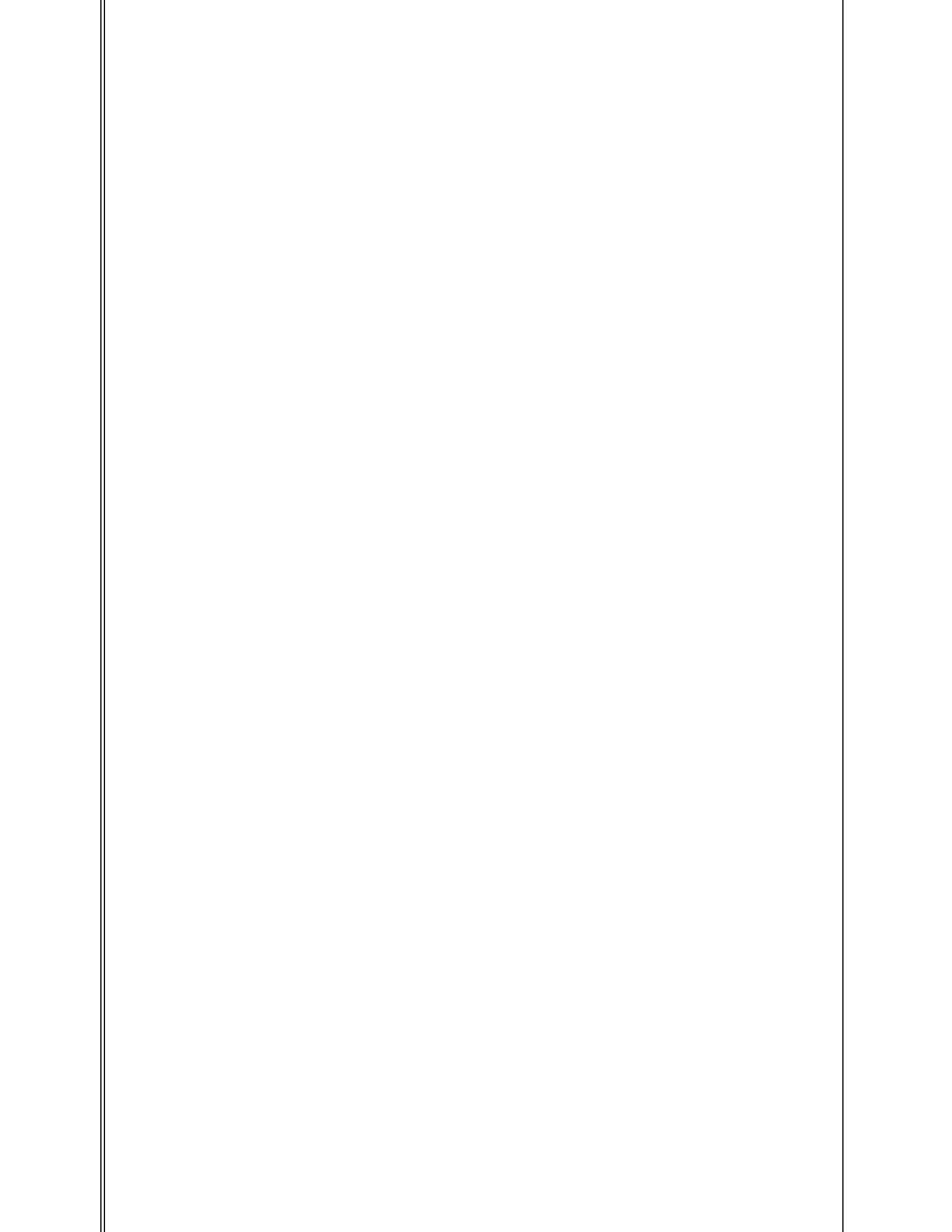
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DOO UHVLGHQF O Y E X E V L Q G H Q W D F W D Y L E X I V H L Q H M Q F I O X U G  
VXFK , Q G L Y L G X D O V H V H Q Y D B M W S Z K H V H H R U D R V D K H H Z P  
DQ G D Q \ H Q W L W \ Y L Q G Z I O F K H W H C O G D Q O K L S D I V Q D V H U R Z Q W  
F G H V F U L E H L Q L G X W D L ' O I M K O W Q L O \$ M D L F K Y R O F K P H G  
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VXEPLW D FRPSOLDQ G G H O R S H L Q B O W K L F U C S G W M X U R I Z O  
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(DFK 0%9 'HIHQGDQW Q D Q P X K V Q U H I S I R O D W D H G D Q \  
SRLQW RI FRQW D F W X U R H R E D V K & R O M S U R W D D V H ' H I H Q G Q  
'HIHQGDQW KDV D Q H R Z Q I H O V K L S R L O Q G H R O H F O L O H W W I  
D I I H F W F R P S O L D Q F I H Q R E X O L G H W M R K Q W D F U G H D W L R Q F O P H  
V D O H R U G L V V R O R X W D R Q V X E W K B L H D W D S D W H Q W K D R W  
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\$GGLWLRQDOO'HHH D Q G D , Q G L P X G W D U H I S R U W D  
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U R O H L Q D Q \ E X V O Q B V Q J D F Q L E X W K O H S F U I R U U Z K L V F K U  
Z K H W K H U D V D Q H Z S G R D Q G B O Q \ R H Q W D W D Q Q R Z K Q H K V  
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