jsinger@ftc.gov

INTRODUCTION

See *infra-*

never undertook

ARGUMENT

1. T D s. C E N A D s E ss, U M A s s T C s

E.g. Kraft, Inc. v. FTC

Id.

See also

See Cliffdale Assocs.

reproduced

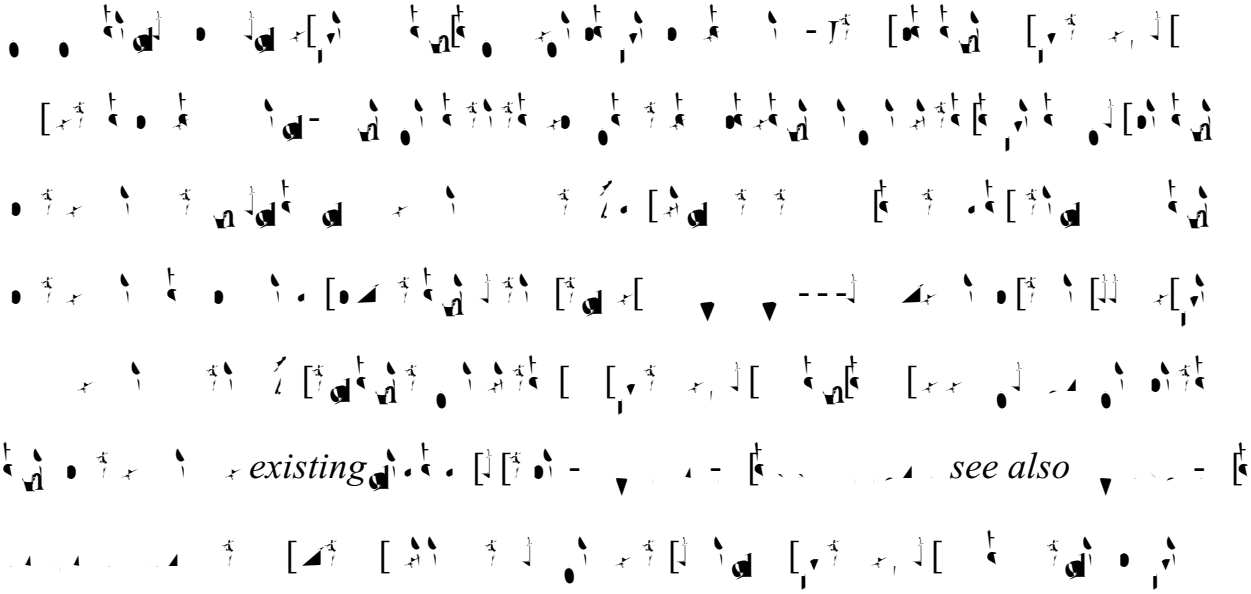
in

see

see

Id.

Id.



defendants

▼ -

▼ -

Id.

[illegible]

FTC v. Five Star Auto Club, Inc.

Five Star

See

reproduced in

Five Star

unqualified

Five Star

without qualification

Id.

Medical Data Capital, Inc.

reproduced in

see

FTC v. Freecom Comm., Inc. *FTC v.*

Tashman

FTC v. Minuteman Press, Inc.

see also

Removatron Int'l Corp. v. FTC

see also

FTC v. Direct Mktg Concepts

- *See*

- *Fourth*

existing

A *arguendo*

- A

[illegible]

Client's full participation in the FFA program and their outside savings account maintenance.

Pom Wonderful, LLC

Telebrands Corp. *aff'd*

FTC Policy Statement on Deception

[illegible]

4. A [illegible] L[illegible]s, [illegible]s Co[illegible]. S[illegible] R[illegible] [illegible]s C[illegible]s o[illegible] D[illegible]s [illegible] Co[illegible] D[illegible] o I[illegible] F[illegible] s

[illegible] *See* [illegible] $$ [illegible] *reproduced in* [illegible]

[illegible] *First* [illegible]

[illegible] - *Second* [illegible] *reproduced in* [illegible]

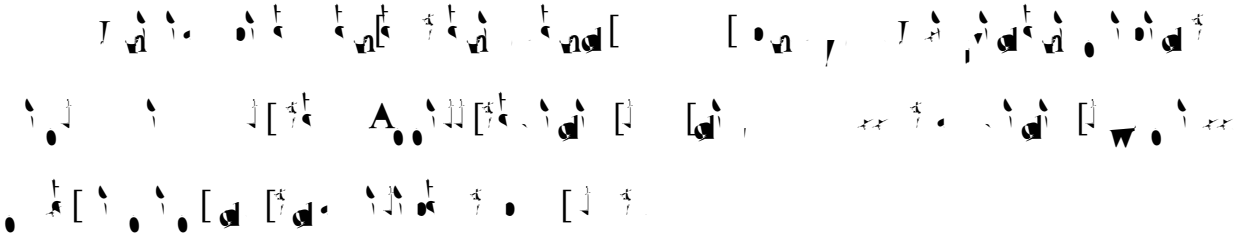
[illegible] - *Third* [illegible] *reproduced in* [illegible]

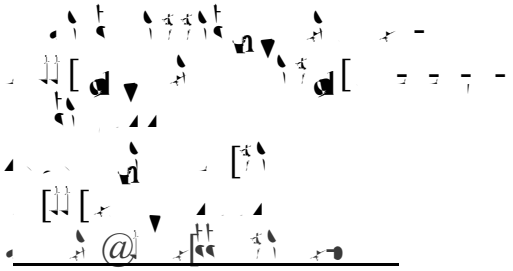
[illegible] - *Fourth* [illegible] *reproduced in* [illegible]

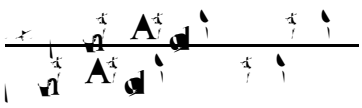
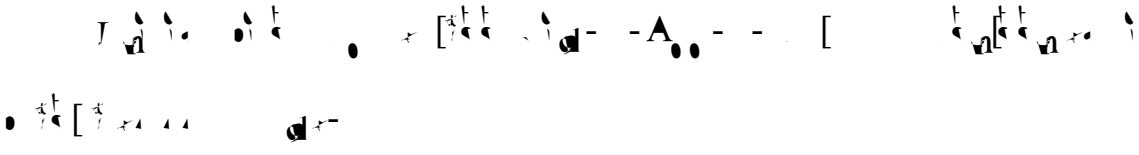
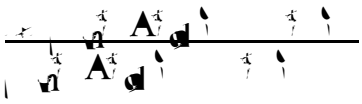
[illegible] - *See* [illegible]

CONCLUSION

CERTIFICATE OF SER ICE







CERTIFICATE OF COMPLIANCE