



JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 53(b) and 57b. This action arises under 15 U.S.C. § 45(a)(1).

*This is a case of the United States District Court for the Southern District of Florida in*

[REDACTED]

7. Defendant Edward Jacobs is a salesman for Universal. At all times material to this complaint, acting alone or in concert with others, he has participated in the acts and practices set forth in this complaint. He resides or has transacted business in the Southern District of



file

business venture are likely to earn substantial income.

25. In truth and in fact, consumers who purchase the Universal business venture are

likely to earn substantial income

business venture, defendants Universal, Robert Ruffeino and Edward Jacobs, directly or

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



...on a reasonable basis at the time it was made" and that "fair earnings claim shall include a

VIOLETIONS OF THE FRANCHISE RULE

COUNT V

Basic Disclosure Violations

45. Paragraphs 1 through 44 are incorporated herein by reference.
46. In connection with the offering of franchises, as "franchise" is defined in Section 436.2(a) of the Franchise Rule, defendants Universal and Robert Ruffeino violate Section 436.1(a) of the Rule and Section 5(a) of the FTC Act by failing to provide prospective franchisees with complete and accurate basic disclosure documents as prescribed by the Rule.

COUNT VI

Earnings Disclosure Violations

47. Paragraphs 1 through 44 are incorporated herein by reference.
48. In connection with the offering of franchises, as "franchise" is defined in Section

436.2(a) of the Franchise Rule, defendants Universal and Robert Ruffeino violate Sections







