

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

BAY AREA BUSINESS COUNCIL, INC.,
a Florida corporation,

020 5762

Civil Action No.

JUDGE JOHN W. BARRAN

[REDACTED]

~~As a preliminary and innovative relief, restitution, rescission or reformation of contracts~~

[REDACTED]

Council, Inc. transacts or has transacted business in the Northern District of Illinois and

[REDACTED]

of the Corporate Defendants. At all times material to this complaint, acting alone or in concert with others, Ms. Harris has formulated, directed, controlled, or participated in the acts and

Northern District of Illinois.

11. At all times relevant to this complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act.

providing those consumers with the MasterCard credit cards program

[REDACTED]

[REDACTED]

failing to disclose, in a clear and conspicuous manner, the total costs to purchase goods before a consumer pays for the goods. 16 C.F.R. § 310.3(a)(1)(i).

28. The Telemarketing Sales Rule also prohibits telemarketers and sellers from misrepresenting any material aspect of the performance, efficacy, nature, or central characteristics of goods or services that are the subject of a sales offer. 16 C.F.R. § 310.3(a)(2)(iii).

29. The Telemarketing Sales Rule also prohibits telemarketers and sellers from, among other things, requesting or receiving payment of any fee or consideration in advance of obtaining or arranging a loan or other extension of credit when the seller or telemarketer has guaranteed or represented a high likelihood of success in obtaining or arranging a loan or other extension of credit. 16 C.F.R. § 310.4(a)(4).

30. Pursuant to Section 3(c) of the Telemarketing Act, 15 U.S.C. § 6102(c) and

the amount specified in the sales calls.

33. Defendants have thereby violated Section 310.3(a)(1)(i) of the Telemarketing Sales Rule, 16 C.F.R. § 310.3(a)(1)(i).

COUNT III

[REDACTED]

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Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap

unjust enrichment and harm the public.

