

[The body of the document is almost entirely obscured by dense horizontal black lines, likely representing redacted text or a scanning artifact. Only a few faint lines of text are visible through the noise.]

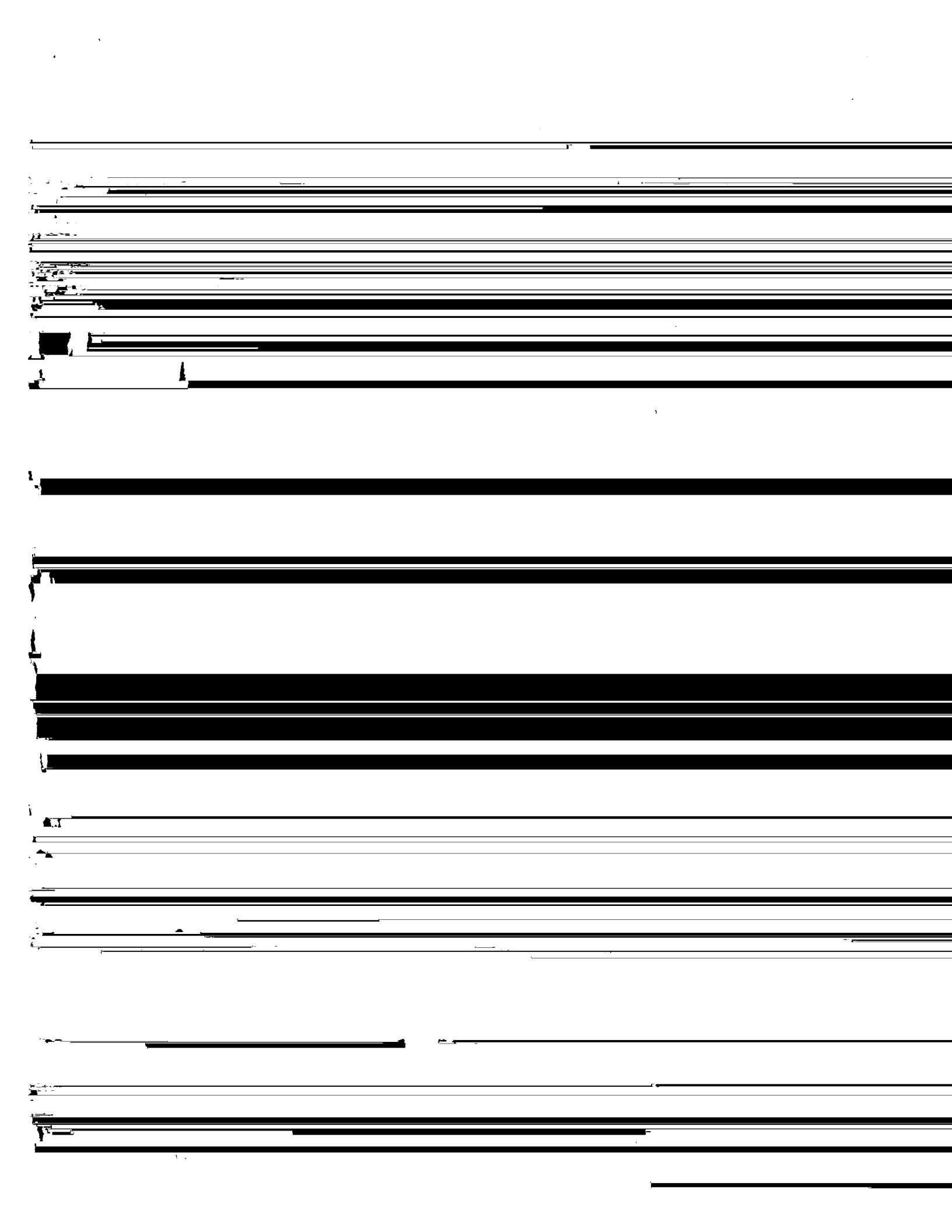
Plaintiff, the Federal Trade Commission ("FTC" or "the Commission") for its complaint

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proceedings, by its own attorneys, to enjoin violations of the FTC Act and the Telemarketing

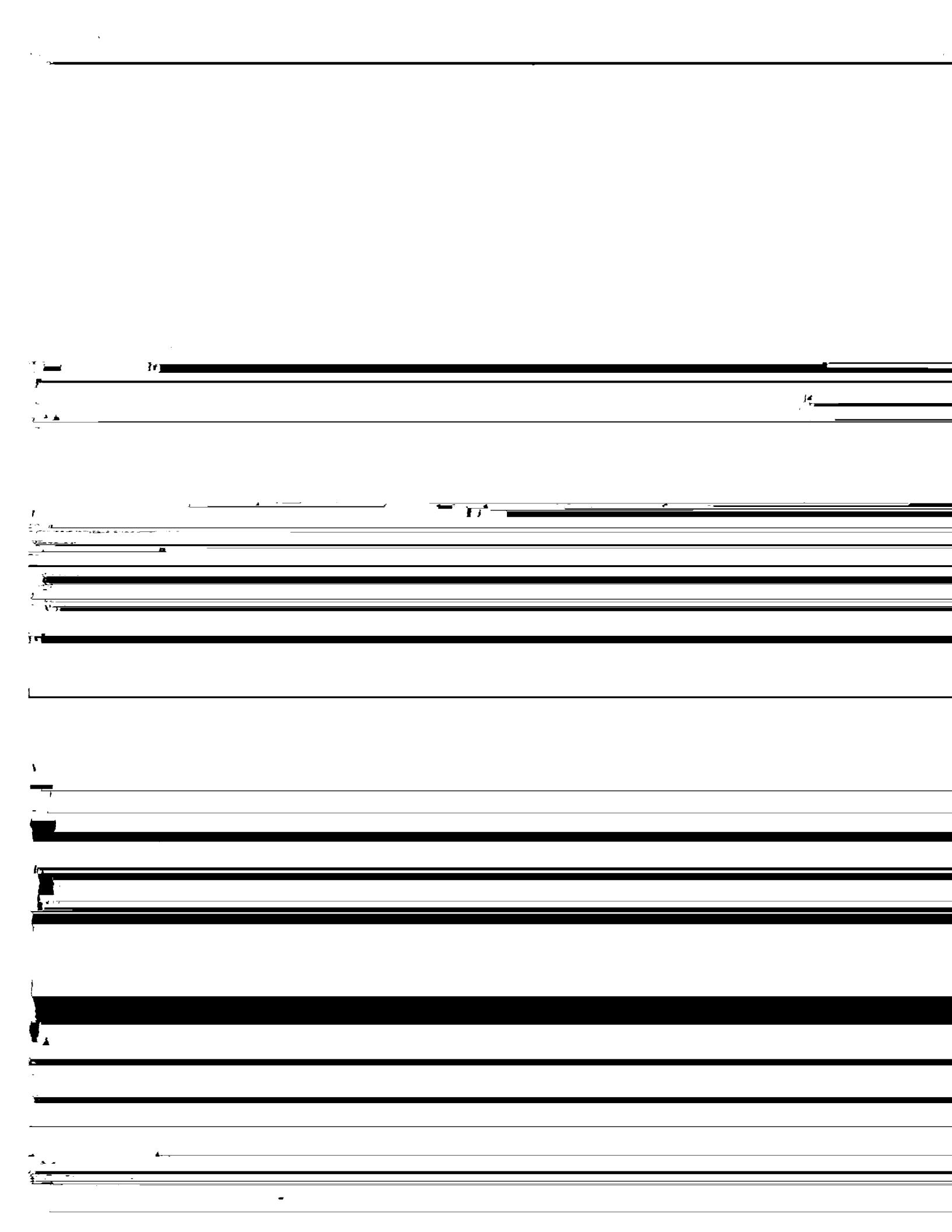
Sales Rule, and to secure such equitable relief as may be appropriate in each case, including

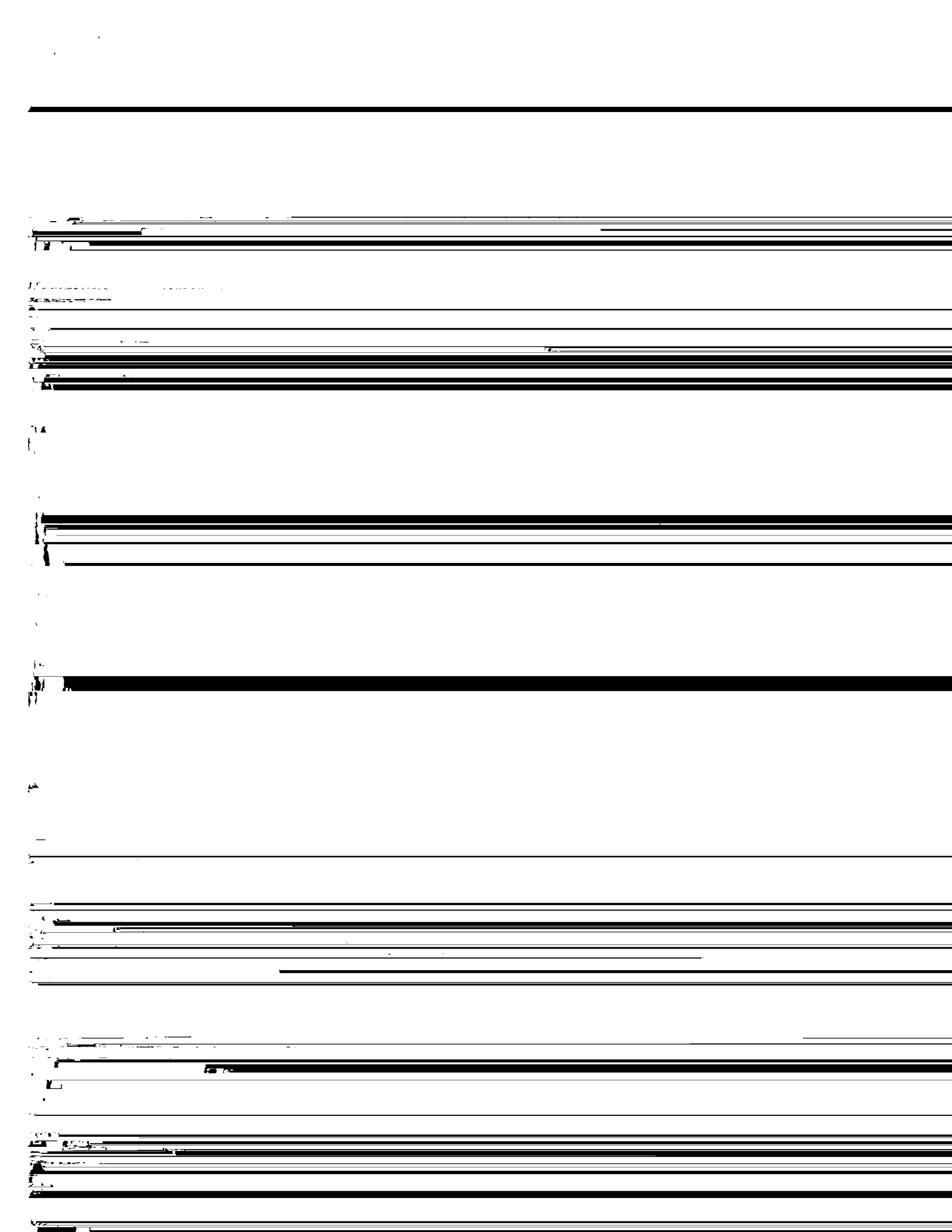
[REDACTED]



\$199 or \$249.

11. \_\_\_\_\_ Celliac consumers through telemarketers located in Canada. Defendants offer to \_\_\_\_\_





that after paying Defendants a fee, consumers will, or are highly likely to, receive an unsecured major credit card, such as a VISA or MasterCard credit card.

28. Defendants have thereby violated Section 310.3(a)(2)(iii) of the Telemarketing Sales Rule, 16 C.F.R. § 310.3(a)(2)(iii).

**COUNT THREE**

29. In numerous instances, in connection with the telemarketing of advance fee credit cards, Defendants or their employees or agents have requested and received payment of a fee in advance of consumers obtaining a credit card when Defendants have guaranteed or represented a high likelihood of success in obtaining an unsecured credit card for the consumer.

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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additional relief as the Court may determine to be just and proper.