

1
2
3
4
5
6
7
8
9
10
11
12

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Civil No.

1
2
3
4
-

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 15 U.S.C. §§ 45(a), 53(b), 57b, 6102(c), and 6105(b), and 28 U.S.C. §§ 1331, 1337(a), and 1345.

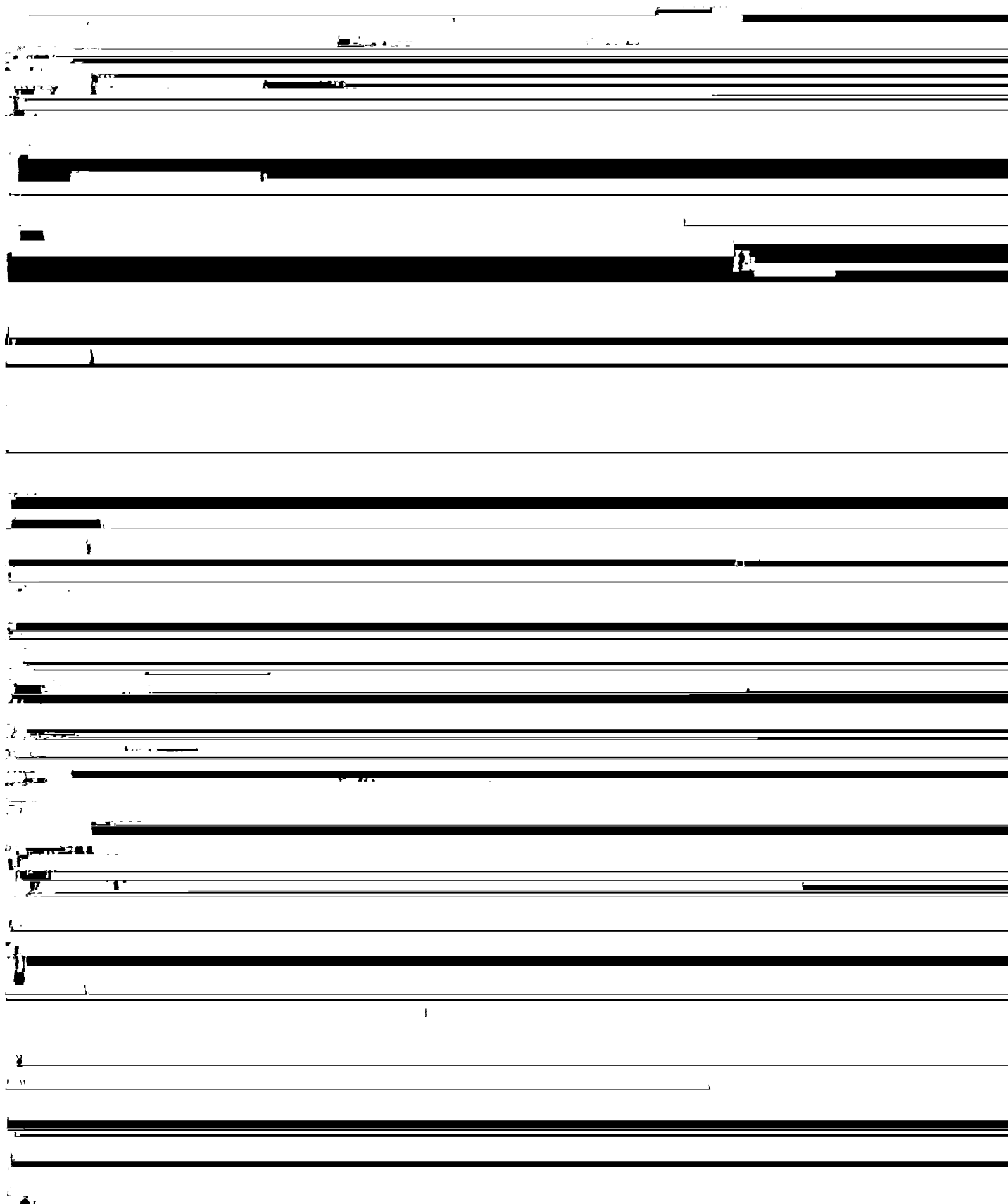
3. Venue in the Western District of Missouri is proper under 15 U.S.C. § 53(b).

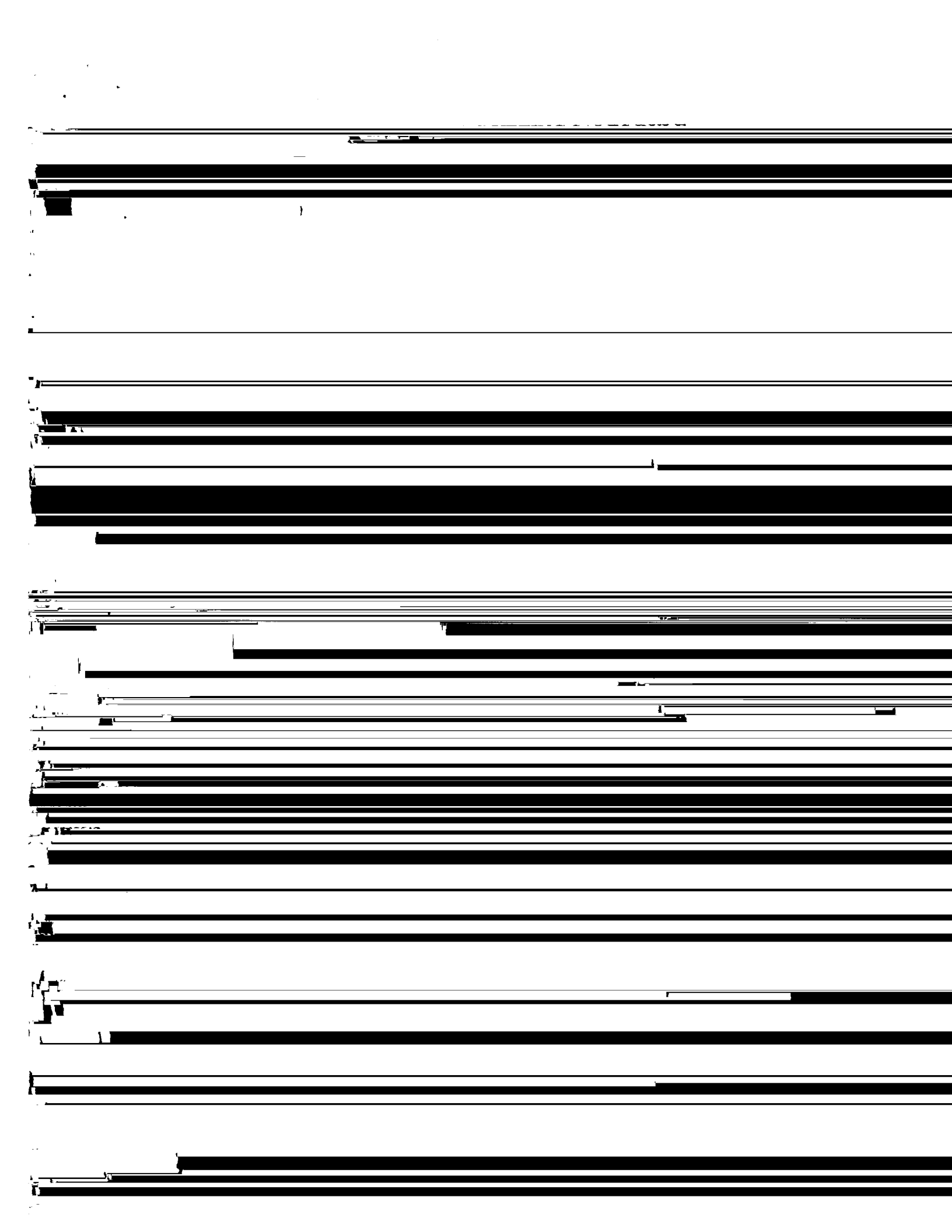
7
8

4. Plaintiff Federal Trade Commission is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58, as amended. The Commission is charged, in the enforcement of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits

1 transacts or has transacted business in the Western District of Missouri.

2 8. Grant Pac, Inc., is a Missouri corporation, with its mailing address at 2304 W.
3 Broadway, #198, Sedalia, MO, and its registered office located at 1844 West Third St., Sedalia,
MO 65201. Grant Pac, Inc. transacts or has transacted business in the Western District of





COUNT FOUR

1

2

3

33. In numerous instances, in connection with the telemarketing of a grant search service, Defendants have represented, directly or by implication, that Defendants will provide a full money back guarantee of the application fee at any time if consumers do not obtain a cash

[REDACTED]

1
2
3
4
5
6
7
8

4. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Dated: _____

Respectfully Submitted,

WILLIAM E. KOVACIC
General Counsel

Mary T. Benfield
Nadine S. Samter
Federal Trade Commission
915 Second Ave., Ste. 2896
Seattle, WA 98174
~~800 368 6868~~