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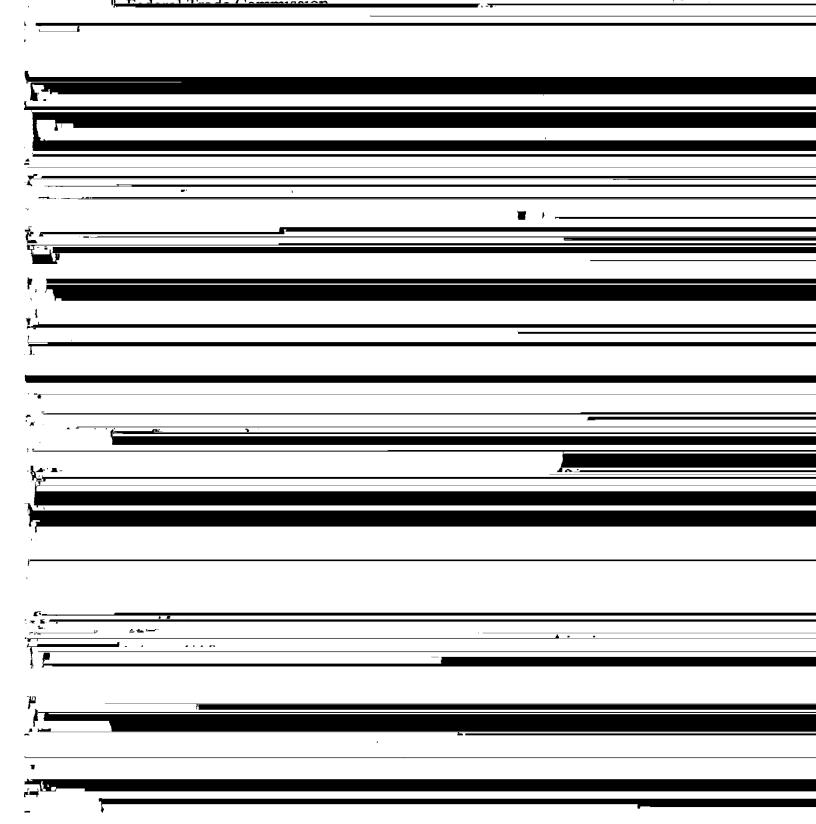
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WILLIAM E. KOVACIC General Counsel

JANICE L. CHARTER JEROME M. STEINER, JR.

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BY ______



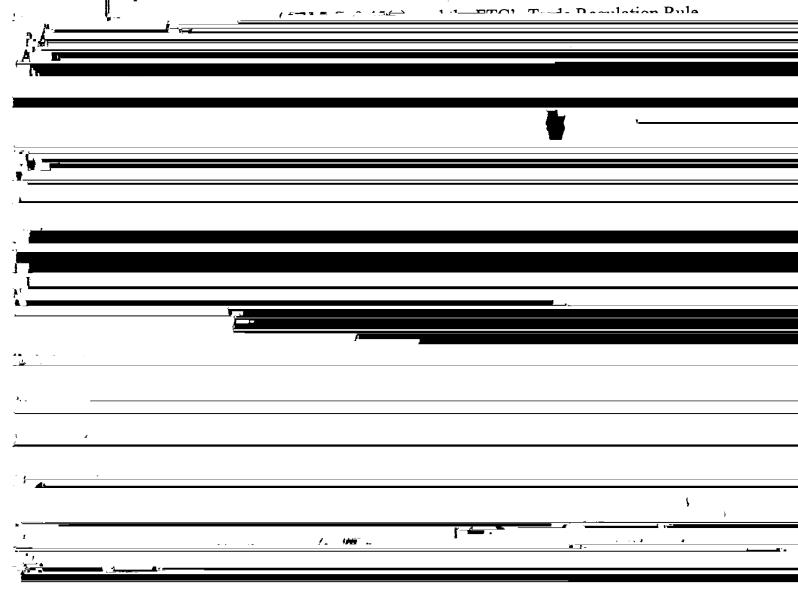
United Family Services and USA Membership Services ("Tyme Lock"); Total Resources, Inc. ("Total Resources"); Ruth R. Adams; and Stella L. Aguilar (collectively, "defendants"), alleges:

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1. The FTC brings this action under Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, and the Telemarketing and Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. §§ 6101-6108, to secure preliminary and permanent injunctive relief, restitution, rescission or reformation of contracts, disgorgement, and other equitable relief for defendants' deceptive acts or practices in violation of Section



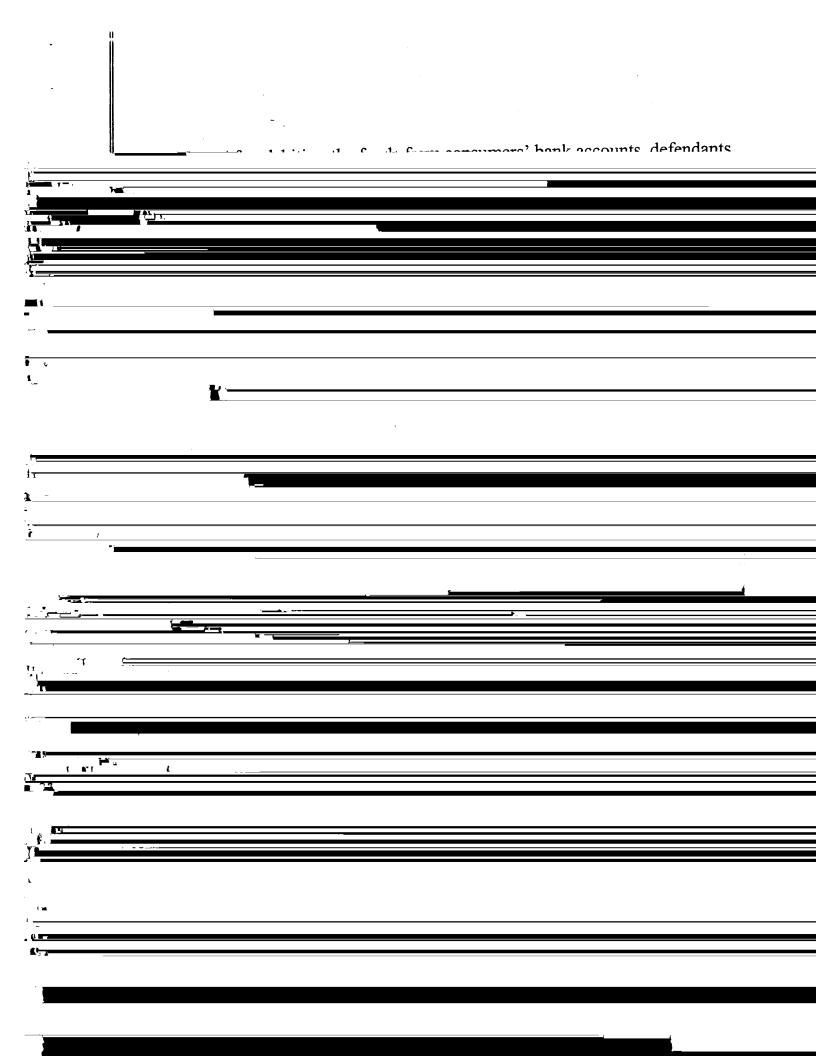
§§ 53(b), 57b, 6102(c), and 6105(b). 1 **DEFENDANTS** 2 Defendant Tyme Lock is a Nevada corporation, with its principal 3 places of business at 1005 S. Cimarron Rd., Las Vegas, Nevada, and 8170 W. Sahara Ave I as Vegas Nevada Tyme Lock transacts or has transacted business

COMMERCE

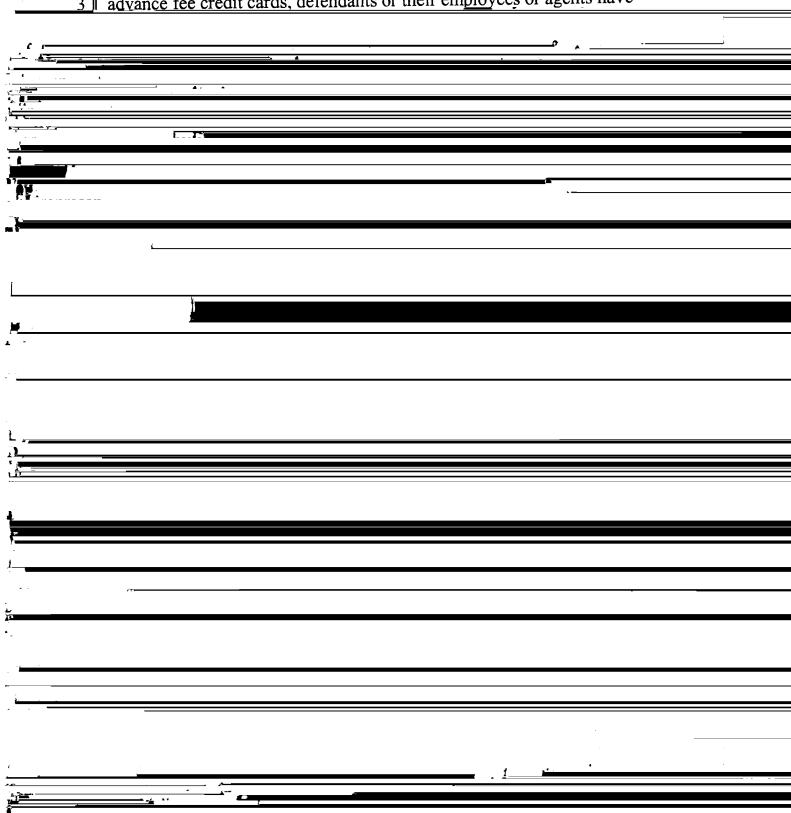
9. At all times relevant to this complaint, defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

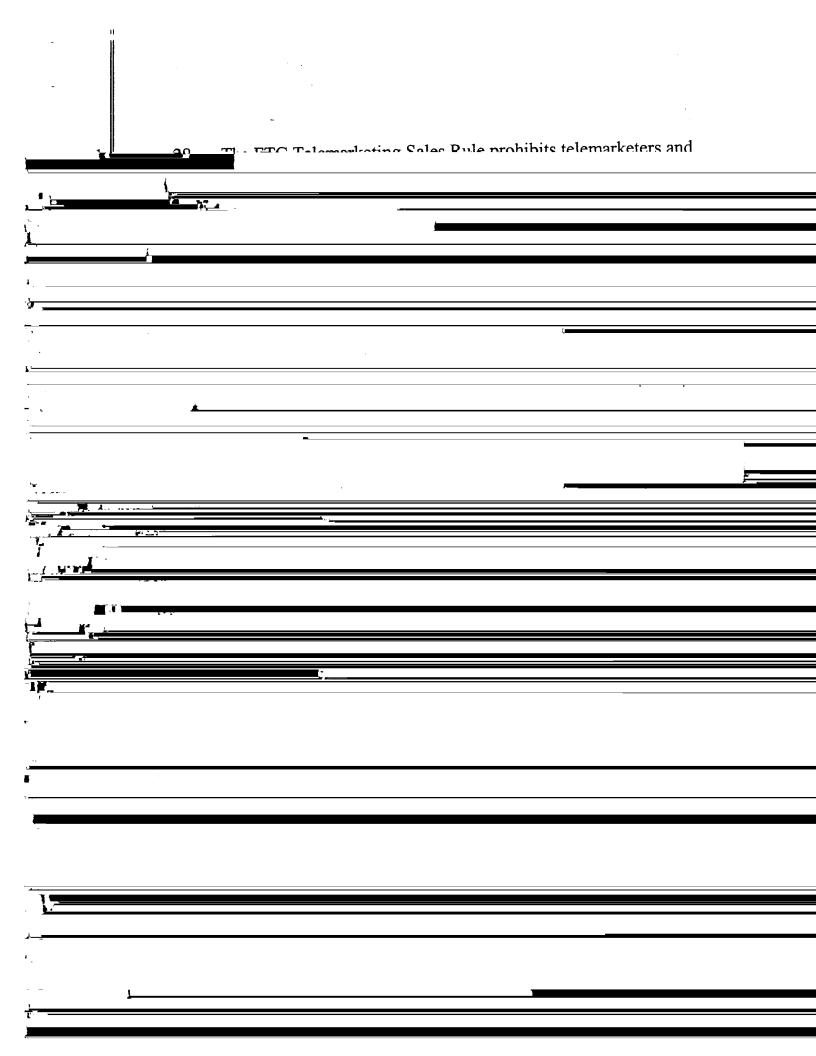
DEFENDANTS' BUSINESS PRACTICES

10.	Since at leas	st June 2000	, defendants Tyme	Lock and Adams, acting
directly or thr	ough their	employees a	nd agents, have ma	de unsolicited telephon
	.1	1 41		ramised to provide cred



21. In numerous instances, in connection with the telemarketing of advance fee credit cards, defendants or their employees or agents have





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and disgorgement of profits resulting from defendants' unlawful acts or practices, and other remedial measures.

Section 19 of the FTC Act, 15 U.S.C. § 57b, and Section 6(b) of the Telemarketing Act, 15 U.S.C. § 6105(b), authorize the Court-to-grant to the FTC such relief as the Court finds necessary to redress injury to consumers or other persons resulting from defendants' violations of the Telemarketing Sales Rule, including the rescission and reformation of contracts and the refund of money.

PRAYER FOR RELIEF

WHEREFORE, plaintiff Federal Trade Commission, pursuant to Sections

