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- 1 WILLIAM E. KOVACIC
General Counsel
- 2 JANICE L. CHARTER
- 3 JEROME M. STEINER, JR.
Federal Trade Commission

BY _____

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

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

(5715 C.F.R. 156) 11-FTC’s Trade Regulation Rule

1 §§ 53(b), 57b, 6102(c), and 6105(b).

2 **DEFENDANTS**

3 5. Defendant Tyme Lock is a Nevada corporation, with its principal
4 places of business at 1005 S. Cimarron Rd., Las Vegas, Nevada, and 8170 W.
5 Sahara Ave. Las Vegas Nevada. Tyme Lock transacts or has transacted business

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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 least June 2000, defendants Tyme Lock and Adams, acting directly or through their employees and agents, have made unsolicited telephone calls throughout the country and falsely promised to provide credit

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1. From consumers' bank accounts defendants

[REDACTED]

COUNT ONE

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

COUNT FOUR

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

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

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

8 **PRAYER FOR RELIEF**

9 WHEREFORE, plaintiff Federal Trade Commission, pursuant to Sections

...well as such other