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## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

	)	
In the Matter of	)	
	)	
THE TED WARREN CORPORATION,	)	
a corporation,	)	
	)	
THE KEN ROBERTS INSTITUTE, INC.,	)	
a corporation,	)	
	)	
THE KEN ROBERTS COMPANY,	)	DOCKET NO. C-4078
a corporation, and	)	
	)	
KEN ROBERTS,	)	
as an officer of the corporations.	)	
	)	
	)	

## **COMPLAINT**

The Federal Trade Commission, having reason to believe that The Ted Warren Corporation, The Ken Roberts Institute, Inc., and The Ken Roberts Company, corporations, and Ken Roberts, as an officer of the corporations ("proposed respondents") have violated the provisions of the Federal Trade

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office or place of business at 333 S.W. 5th Street, Grants Pass, OR 97526.

- 1.d. Respondent Ken Roberts is an officer of TWC, KRI, and KRC. As an officer, Ken Roberts, individually or in concert with others, formulates, directs, or controls, the policies, acts, or practices of TWC, KRI, and KRC.
- 2. Respondents have advertised, offered for sale, sold, and distributed materials ("Investment Courses") that purport to teach purchasers how to profitably trade stocks, commodity futures and options, and real estate. The Investment Courses sold by respondents include the "TWC Stock Course" for trading stocks, the "KRI Investment Portfolio" for creating an investment portfolio, the "KRC Commodity Course" for trading commodity futures contracts and options, and the "Jim Banks Probate Course," pursuant to a marketing agreement with J.G. Banks, Inc., for purchasing real estate and personal property through probate proceedings. Respondents have sold these Investment Courses through the Internet web site <a href="www.kenroberts.net">www.kenroberts.net</a> and related web sites.
- 3. The acts and practices of respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.
- 4. In their Internet Advertisements, Respondents have represented by implication, that purchasers of the Investment Courses who make profitable "paper trades" practice trades in which no funds are actually invested using techniques described in the Investment Courses during one time period are likely to make profitable actual trades when their funds are invested in the market during a later time period.
- 5. In truth and in fact, successful "paper trading" during one time period does not predict successful actual trading during a later time period. Therefore, the representation set forth in Paragraph 4 was, and is, false or misleading.

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