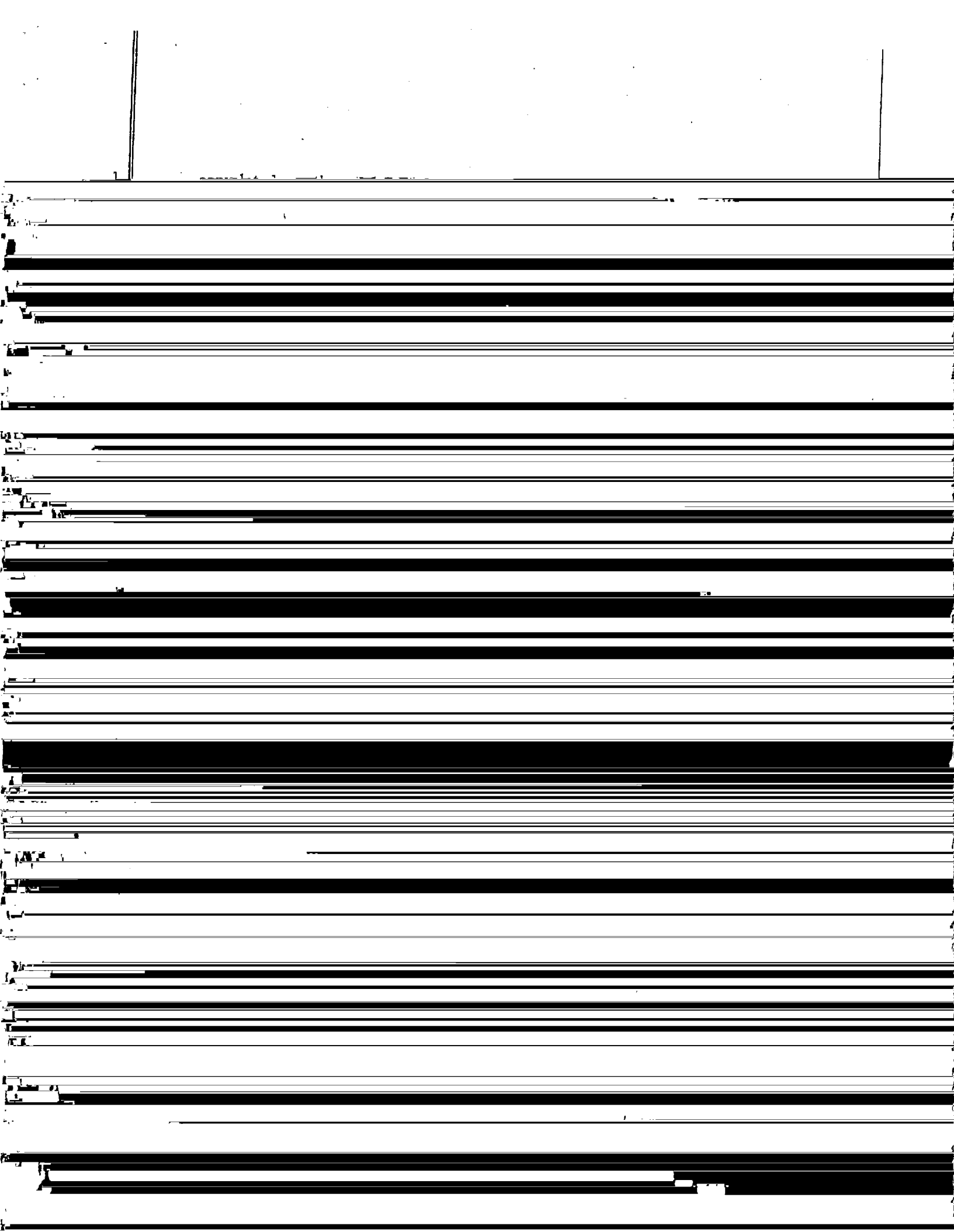
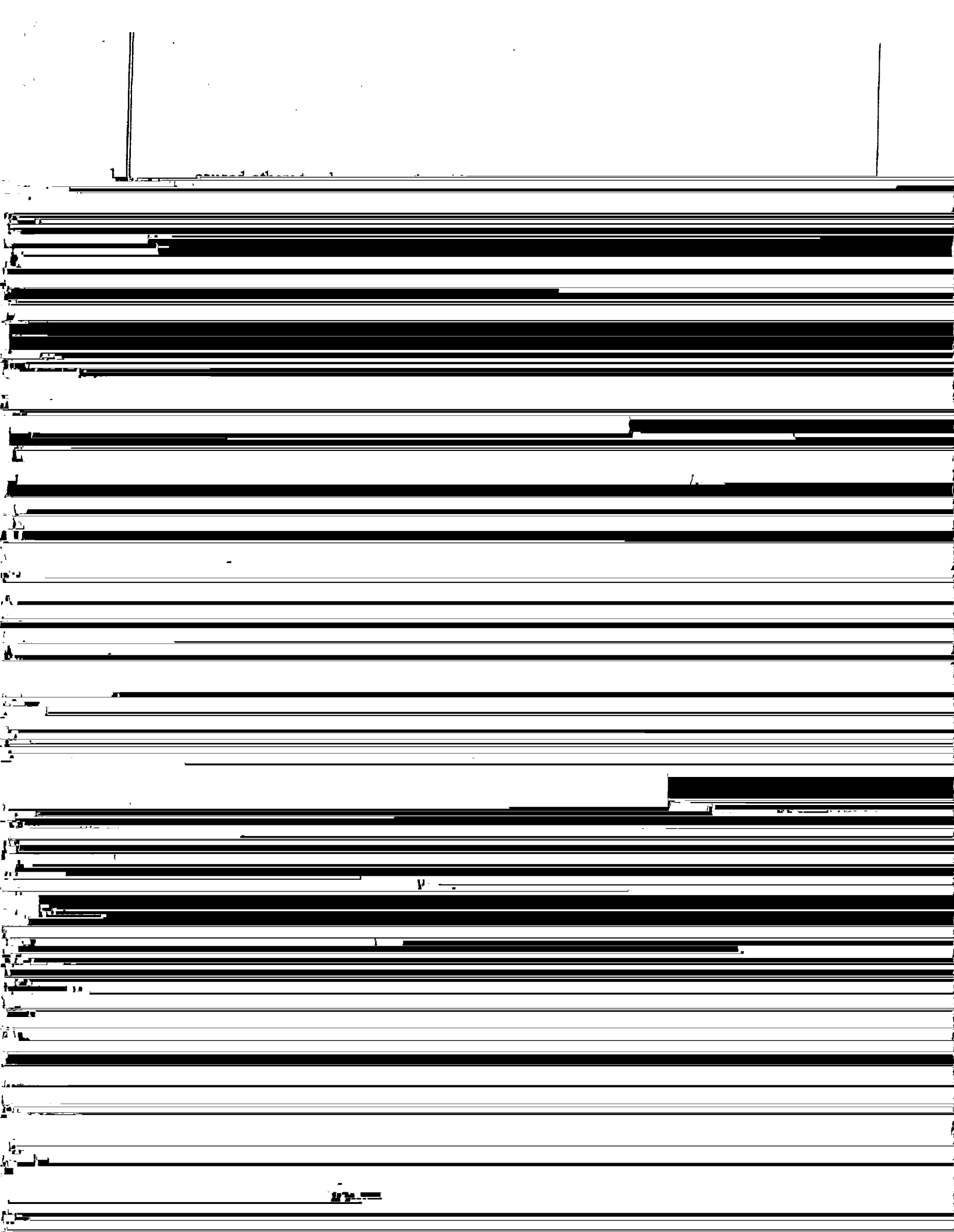


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BMG. She is the spouse of defendant Frank Braglia. In connection with the matters
alleged herein, she resides or has transacted business in this District. At all times material
to this complaint, acting alone or in concert with others, she has formulated, directed,
controlled, presented, and







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Count III

(Failing to Pay the Fee to Access the National Do Not Call Registry)

25. In numerous instances, in connection with telemarketing, defendants have initiated, or caused others to initiate,

1 5(m)(1)(A), 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b) and 57b, and
2 pursuant to its own equitable powers:

3 1. Enter judgment against defendants and in favor of plaintiff for each violation alleged in
4 this complaint;

5 2. Award plaintiff monetary civil penalties from defendants for every violation of the TSR;

6 3. Damages...