

- Los Angeles
10877 Wilshire Blvd, Suite 700
Los Angeles, CA 90024
(310) 824-4325

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, 1 NO-.C

Plaintiff,

v.

COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF

FGH INTERNATIONAL CORPORATION,)
INTI CALIFORNIA, INC.,)
JAIME JHONNY ROJAS VILLANUEVA,)
WILSON EDGAR ROJAS VILLANUEVA,)
FRANCO QUINTERO MORALES, 1

Defendants. 1

plaintiff, Federal Trade Commission

Trade Commission Act

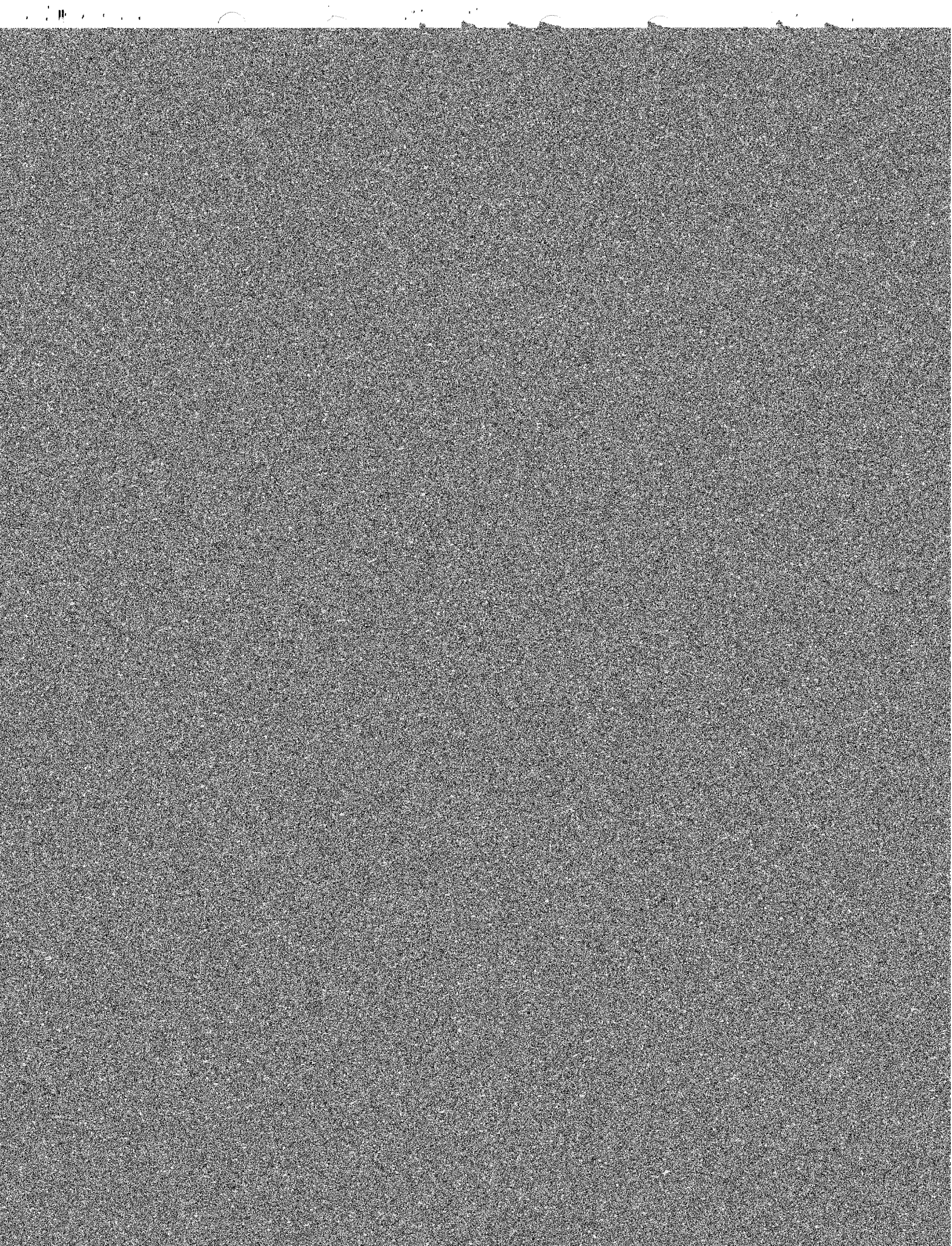
("FTCAct"), 15 U.S.C.

§§ 53(b) and 57b, and the Telemarketing and Consumer Fraud and
Abuse Prevention Act ("TelemarketingAct"), 15 U.S.C. § 6101 et
seq., to secure preliminary and permanent injunctive relief,

1 | rescission of contracts. restitution. disgorgement of ill-gotten

1

5. Defendant FGH International Corporation ("FGH") is a



COUNT TWO

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2
3
4

20. In numerous instances, in connection with the sale, offering for sale, or distribution of instructional programs, Defendants have sent materials to consumers who did not order

