



Federal Trade Commission Act, 15 U.S.C. §§ 45(a) and 53(b), to obtain  
temporary, preliminary, and permanent injunctive relief, rescission of contracts,  
restitution, disgorgement, appointment of a receiver, and civil penalties.

court proceedings, by its own attorneys, to enjoin violations of the FTC Act in

order to secure such equitable relief as may be appropriate in each case. 15 U.S.C.

§ 53(b).

§ Defendant Minto Staffed in the amount of \$1,000,000.00

to work from home, in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

**DEFENDANTS’ BUSINESS PRACTICES**

8. Beginning as early as 2002, defendants Misty Stafford and William Stafford (collectively referred to as “defendants”) advertised nationally in newspapers and mail solicitations for persons wanting to work at home. Defendants’ newspaper ads typically proclaim “**SIMPLE WORK/TOP PAY**” for assembling refrigerator magnets. Interested consumers are to call a telephone

number in the ad. A copy of one of these ads is attached to this Complaint as

Attachment A

# HOME ASSEMBLERS NEEDED!

EARN UP TO \$800 PER WEEK

ASSEMBLING PRODUCTS AT HOME!

NO SPECIAL SKILLS REQUIRED

WORK FROM THE COMFORT OF YOUR OWN HOME!

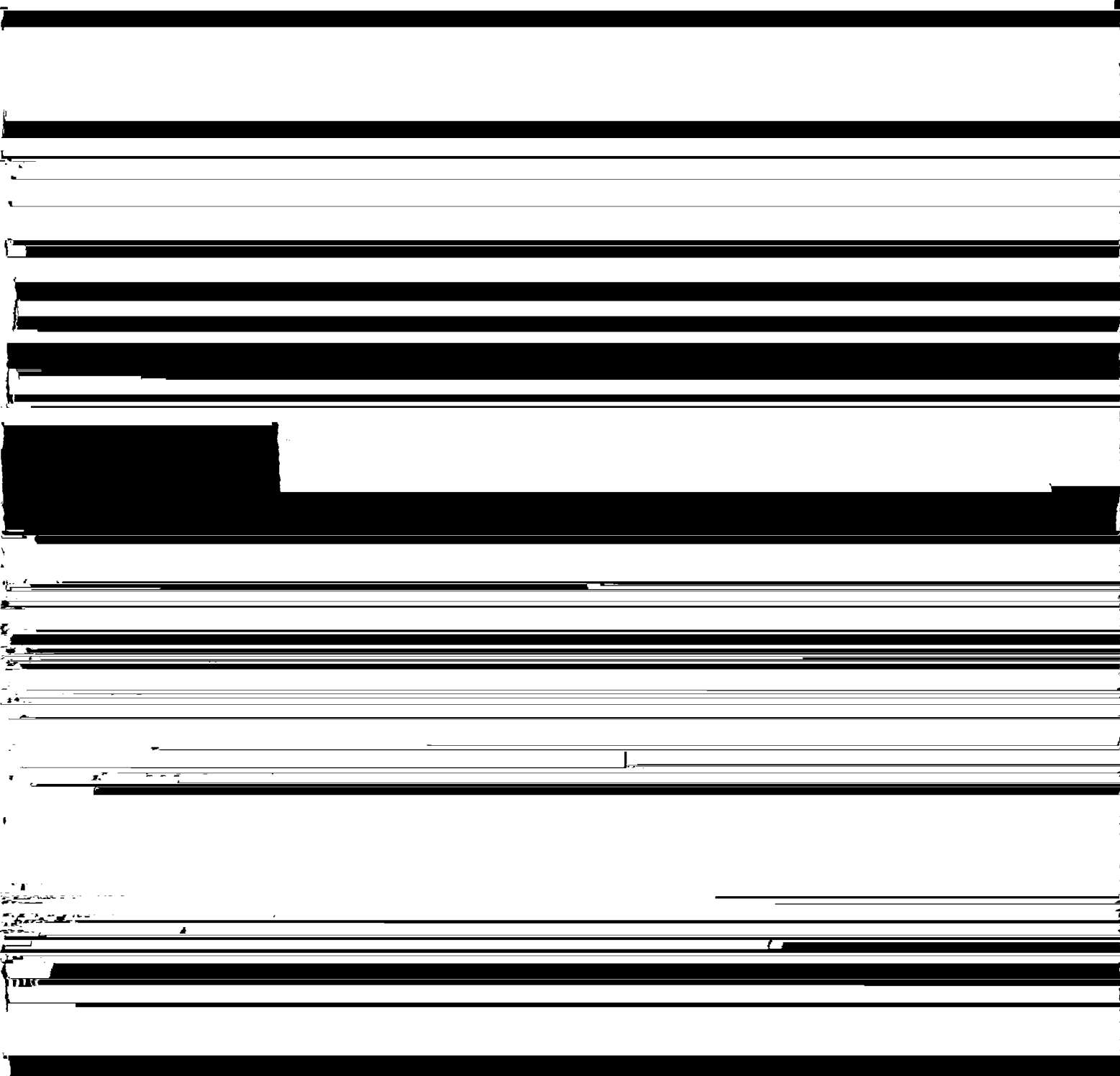
\* \* \*

Because of the success of our well-established home assembly operation, we are no longer able to meet our bulk home assembly requirements. Therefore we are now accepting applications for Home Assemblers. The work is very simple and easy and requires no

11. Consumers wishing to make a full unit of sixty magnets need additional materials. Defendants charge over ninety-eight dollars (\$98) for supplies for a full unit. If any of the sixty magnets fails to meet defendants'

~~standards, the entire unit is rejected; consumers can have the rejected magnets~~

that persons engaged in such work for defendants are likely to come substantial



CONSUMER INJURY

29. Consumers nationwide have suffered and will continue to suffer

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



1. Award plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including an

*ex parte* temporary restraining order with an order freezing assets, appointing a receiver to operate the business, accounting, and expedited discovery;

2. Permanently enjoin defendants from violating the FTC Act as alleged in this Complaint;

3. Award such equitable relief as the Court finds necessary to redress injury to consumers resulting from defendants' violations of Section 5(a) of the FTC Act, including but not limited to rescission of contracts, restitution, and the disgorgement of ill-gotten gains by the defendants; and

Respectfully submitted,

Dated: 1-1-05, 2005



G. Michael Thiel

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Middle District of Pennsylvania  
570-348-2807, ext. 269

John D. Graubert,  
Acting General Counsel  
Federal Trade Commission

Dated: February 1, 2005



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