

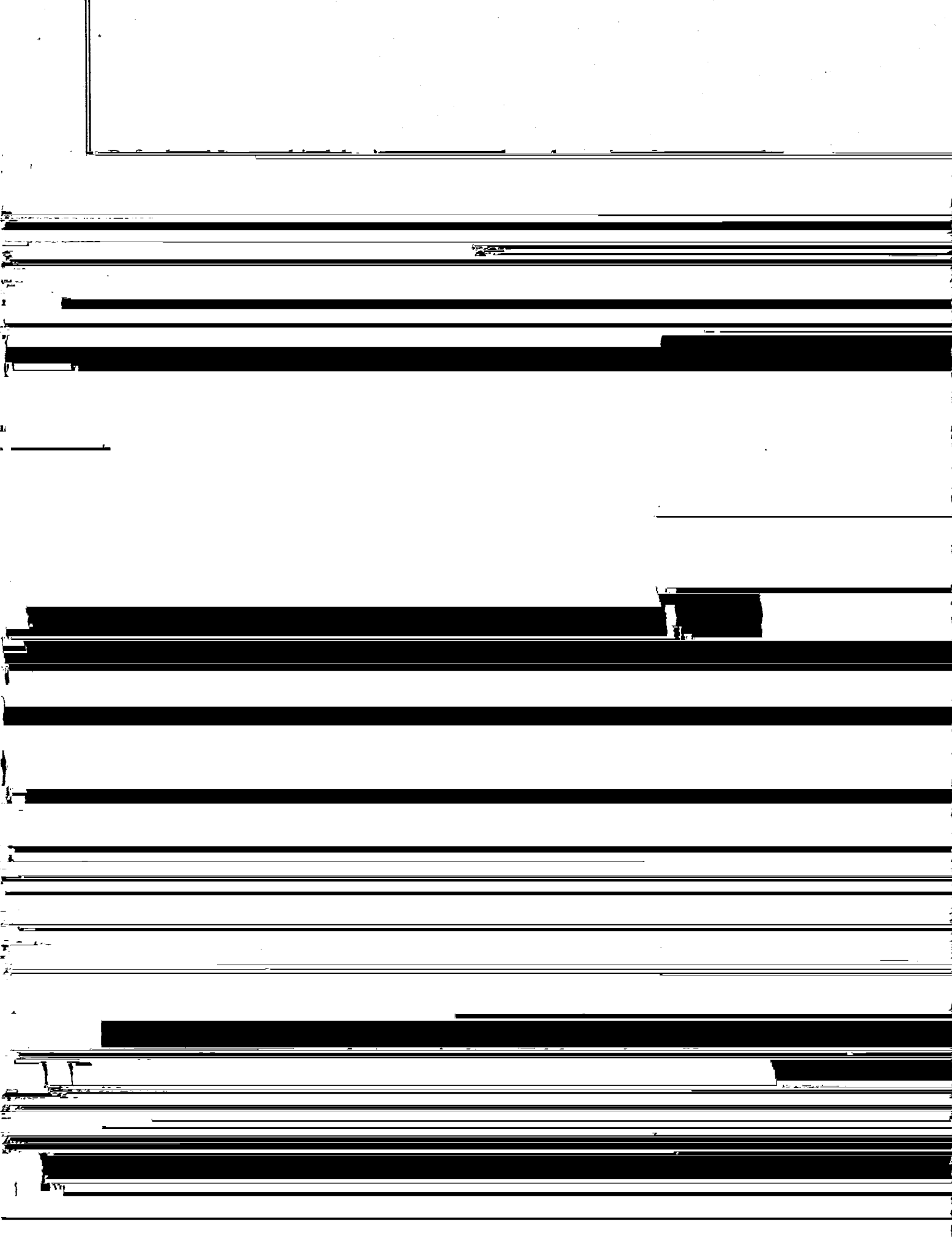
1 U.S.C. §§ 45(a), 53(b), and 57b, to obtain permanent injunctive relief, rescission of
2 contracts, restitution, disgorgement, and other equitable relief for the defendants'
3 violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the FTC's Trade
4 Regulation Rule entitled "Disclosure Requirements and Prohibitions Concerning

1 transacted business in the District of Nevada.

2 7. Defendant 360 WIRELESS CORP. is a Nevada corporation with its principal

1 12. By purchasing one of Defendants' Internet kiosk business ventures, a consumer

2, purportedly receives ownership of an Internet kiosk bearing the trademark of BYC



1 of an Internet-based business venture that each owner will earn substantial income that

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(Exhibit 3, p.5)

e. **Locations**

- **Bowling Centers**
- **Domestic Hospitality**
 - **Howard Johnson's**
 - **Best Value Inns**
 - **Best Western**
 - **Wyndam Hotels**
- **Domestic Retail**
 - **Casinos**

1

COUNT II

2

Means and Instrumentalities

3

2025 Defendant's NCJD ...

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

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1 franchisees; and/or (3) failing to provide prospective franchisees with an earnings claim
2 document, as prescribed by the Rule.

3 COUNT V

4 Advertising Disclosure Violations

5 35. In connection with the promotion, offer for sale, or sale of franchises, as
6 "franchise" is defined in Section 436.2(a) of the Franchise Rule, Defendants have
7 violated Section 436.1(e) of the Rule and Section 5(a) of the FTC Act by making
8 generally disseminated earnings claims without, *inter alia*, disclosing, in immediate
9 conjunction with the claims, information required by the Franchise Rule including the
10 number and percentage of prior purchasers known by Defendants to have returned the

