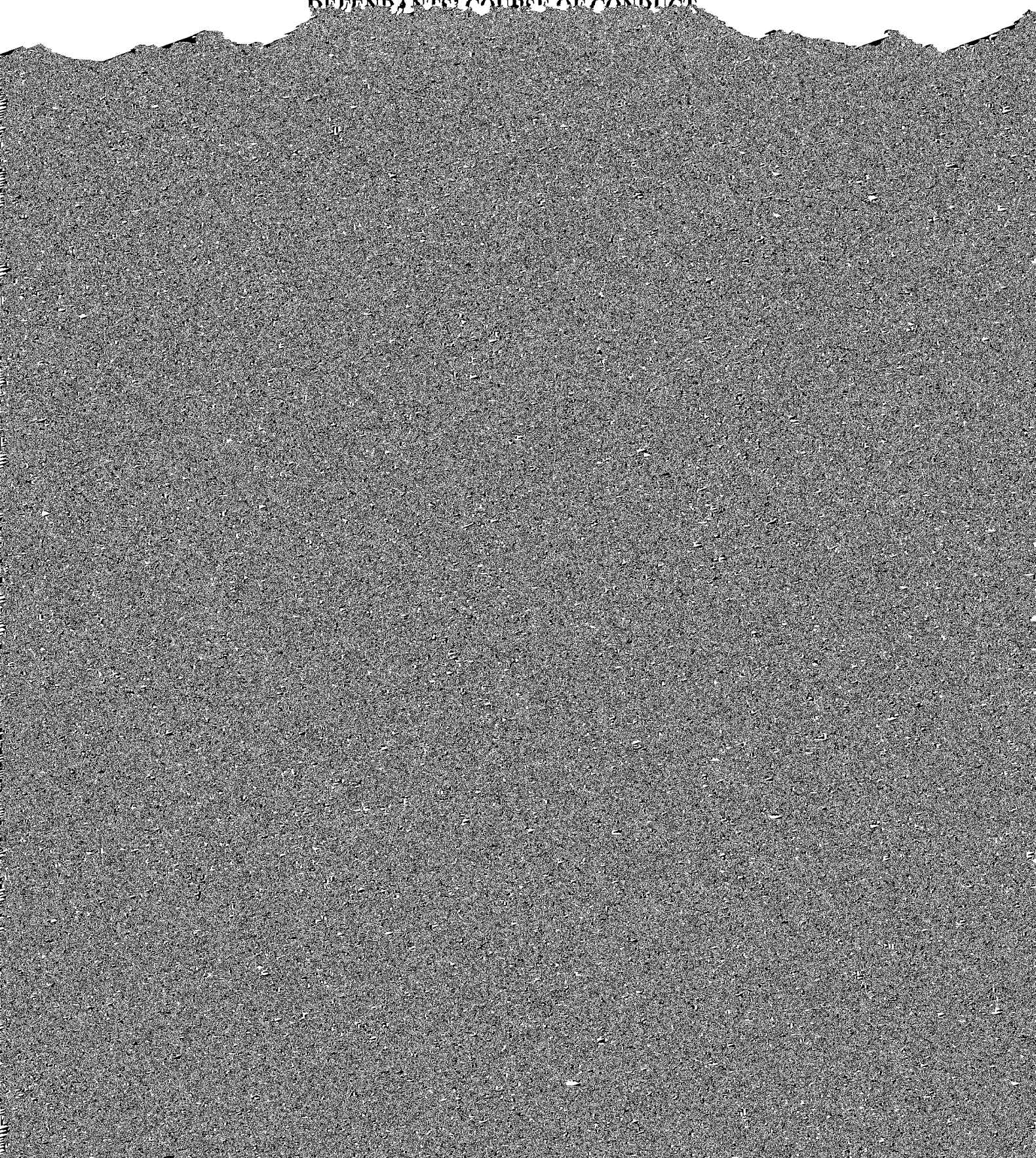






7. The acts and practices of defendants alleged in this Complaint are in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

**DEFENDANTS' COURSE OF CONDUCT**



















34. Section 127(a) of TILA, 15 U.S.C. § 1637(a), and § 226.6 of Regulation Z, 12

C.F.R. § 226.6 provide that before opening any account under or over and consumer credit



charge, the range of balances to which it is applicable, the corresponding annual





