

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

FILED
FEB 8 2016
DISTRICT COURT
ARIZONA
TUCSON
U.S. DISTRICT COURT
DISTRICT OF ARIZONA
TUCSON, ARIZONA

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

FEDERAL TRADE COMMISSION,
Plaintiff,
v.
STEPPING STONEZ
DEVELOPMENT, LLC;
INTENTIONAL GROWTH, LLC; and
STEPHEN J. REMLEY,
Defendants.

Case No.
COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF

1 F E b b h d b B h F d G A
E A S S § 3b , o h
h

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

7 7
8 8

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
2
3
4
5
6
7
8

[Illegible text]

b h

COMMERCE

0

[Illegible text]

DEFENDANT'S BUSINESS PRACTICES

1

[Illegible text]

;

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

h
h
1 h

1
2
3
4
5
6
7
8
9
0
1

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

• [redacted]

[redacted]

[redacted]

[redacted]

• [redacted]

[redacted]

• [redacted]

[redacted]

• [redacted]

[redacted]

• [redacted]

[redacted]

• [redacted]

[redacted]

6 [redacted] [redacted]

[redacted]

a [redacted]

b [redacted]

[redacted]

[redacted]

c [redacted]

[redacted]

d [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

e
f
g
h
i
j



~~N~~
W
E

0

0

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

h
h
b h
h
h
h
c h
h
h
h
h

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

f

9

h
v
h
h
v

h

h

h

h

h

h

h

h

h

h

h

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

●
●
●
●
●
2 ●
●
8 ●
●
●
●
●
●
●
●
●
2 ●
●
●
●

●

●

●

●

●

●

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
2
3
4
5
6
7
8

h

h

h

h

h h

h

h

h

h

VIOLATIONS OF THE FTC ACT

h

h

h

h

Count I

h

h

h

h

h

h

h

h

h

h

h

h

h

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8



THIS COURT'S POWER TO GRANT RELIEF

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
2
3
4
5
6
7
8

4

h

h

h

h

h

h

h

PRAYER FOR RELIEF

h

h

A

h

h

h

h

B

h

h

h

C

h

h

n

h

h

h

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

D

6

6

6

6

6

6