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'HIHQGDQWV GHFHSWLYHO\ PDUNHW DQG VHOO HFR  
VH~~0~~WXG\ SURJUDPV E\ IDOVHO\ FODLPLQJ WKDW FRQVXPHU  
RQOLQH VWRUHV WKDW DUH <sup>3</sup>SRZHUHG E\ DUWLILFLDO LQW  
'HIHQGDQWV IDOVHO\ SURPLVH WKDW FRQVXPHUV ZLOO TXL

HYHQ PDNH PLOOLRQV RI GROODUV ,Q WUXWK WKH SURPL  
HQULFK WKHPVHOYHV ZKLOH OHDYLQJ WKHLU FOLHQWV ZLV  
SURILW 'HIHQGDQWV YLRODWH WKH &RQVXPHU 5HYLHZ )DLU  
SURJUDPV DUH IDOVH RU XQVXEVDQWLDWHG

:KHQ VHOOLQJ WKHLU EXVLQHVV KSRDWDXJLPHW  
FODXVHV LQ WKHLU KRUW YROXWDDOV DKO WRSURKQLFDWLRQ  
'HIHQGDQWV ZKLFK YLRODWH WKH &RQVXPHU 5HYLHZ )DLU  
UHTXLUHG VWDWHPHQWV DQG GLVFRVHMVGRSRHWWQLZKL  
UHTXLUHG E\ WKH %XVLQHVV 2SSRUWXQLW\ 5XOH

6LQFH 'HIHQGDQWV YLRODWH WKH &RQVXPHU 5HYLHZ )DLU OOLRQ

-85,6', & 7,21 \$1' 9(18(

7KLV &RXUW KDV VXEMHFW PDWWHU MXULVGLFWLRQ

DQG



'(1)'\$1761 %86,1(66 \$&7,9,7,(6

6LQFH DW ODDG WFRQWLQXLQJ WKURXJK WKH SUHVV  
PDUNHWLQJ EXVLQHVV RRSRUW XQLWLVW XQDQSUROV BPV WR F  
FRXQWU\ DQG DEURDG WKURXJK WKH LQWHUQHWPDPLO D  
,QVWDJLDNFBQG <RX7XEH

,Q ERWK WKHLU VHOI VWXG\ DQG EXVLQHVV RSRUW  
GURSVKLSSLQJ' EXVLQHVV PRGHO ,Q WKH GURSVKLSSLQJ  
SURGXFWV ZLWKRXW NHHSLQJ WKHP LQ VWRFN :KHQ D VKR  
VWRUH WKH SURGXFW DSDXWV RKLGHUHGGLUHFWO\ WR WK  
'HIHQGDQW FOLHQWV FKHDS SURGXFWV IURP &KLQHVH GU  
WKHQ PDUNHW DSSSHO DWHW XWV WKH SWL RHHWK'WRHQGDQW  
WKHLU FOLHQWV

*Deceptive Advertising and Marketing of Defendants' Business Opportunities*

'HIHQGDQW WKH UNQHMVV RSRUWXQLWLHV DV 'RQH  
%XVLQHVV ,Q SWBDDVQLQ DP 3URJUDP ' \$FFRUGLQJ WR 'HI  
RRSRUWXQLWLHV DUH SRZHUHG E\ DUWLILFLDO LQWHOOLJH  
VHYHQ ILJXUH' RU HLJKW ILJXWV WLDQV 'ELHQGDQWV WBD  
'HIHQGDQWV ZLOO EXLOG DQG ODRZIKQ JDRFOLHQWV XVLQHW  
SURYHQ VHFUXH DQG VFDODEOH V\WHP WKDW V LQIODWL  
'HIHQGDQWV SURPLVH WR SURYLGH D VHFRRQGDU\ LQFRPH

,Q WKH UNHWLQJ 'HIHQGDQWV DVVHUV WKDW WKHL  
FOLHQWV WKH JXHVVZRUN DQG VWDUW D PLOOLRQ GROOM  
SRZHU RI DUWLILFLDO LQWHOOLJHQFH' DQG 'HIHQGDQWV  
WKHLU FOLHQWV ZLOO PDNH D PRQWK LQ LQFRPH DQ



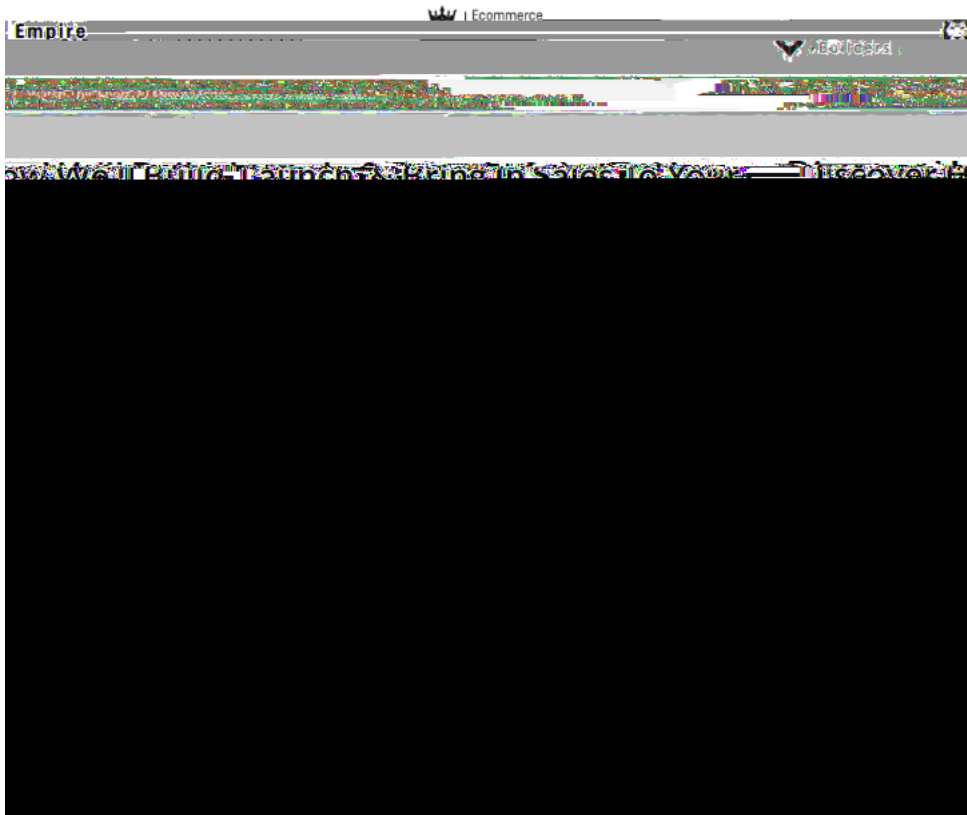
'HIHQGDQWR DGYHUWLVH DQG PDUNHW WKHLU EXVL  
DQG 7LN7RN 'HIHQGDQWV† ,QVWDJUDP DFFRXQW HFRPPHU  
IROORZHUV DQG GULYHV FR'QVXQGDQWU† ILLNWRNWKH  
#HFRPP HPSLUH EXLOGHUV KDV IROORZHUV DQG C  
FRQWDLQ FODLPV DERXW EXLOGLQJ ³\$, 3RZHUHG´ HFRPPHU  
,QVWDJUDP SURILOH LQB[VLVN DQ MKRMLU ZHBMLOWLQJ VWD  
\$V VHHQ LQ WKH LPDJHV EHORZ 'HIHQGDQWV† ,QV  
FRQWDLVWKHR G J P°€` LN W







HQRXJK PRQH\ SHRSOH VWUXJJOLQJ WR JHW WKHLU HFRPP  
SUHGLFWDEOH PRQH\ RU DQ\RQH ZKR KDV IHOW RYHUZKHO  
EXVLQHVV DQG JRW QR UHFODLPWHYMOQVWMLQJHUXWBSBZVMLX  
DUH IRU DQ\RQH ZKR ZDQDW WHRGLSLWDLQJFDRO\$,HORZ



\$FFRUGLQJ WR 3UXVLQIRZMNDLQ(H%WROBISQWPLJH WKH  
VWRUHV DQG LQFU:LDWK'WIKHQLDQMYHJQIXHQHOVQBHWMLQRZV  
'HIHQGDQWV EXVLQHVV RSSRUWXQLWLHV FRXOG VHH UHYH  
FXVWRPHUV DQG SHU \HDU IURP RQO\ PRQWKO\ V)  
,Q WKHMMUDLQYLGIBR3UXVLQRZVNL FRQWLQXH(V%WR FODL  
EXLOGV IRU FRQVXPHUV DUH ³SRZHUG E\ DUWLILFLDO LQW  
3UXVLQRZVNL FODLPV DDWDQDFHDC\LEWHQDGGJHQFHQWR WK  
FRQVXPHUV ZLOO EH DEOH WR XVH LW WR ³ZULWH>@ FRS\  
FXVWRPHU VBIWXLVLEQRZVWFKDFVDVSVHFVVXRVHGEVXR LQRWWW WIKQ

WKRXVDQGV RI GROODUV DUHSORZ UDDPOV EZLMCKW\$ LQVDFY LQJH @ C  
DQG LQ@U WSKR UUV

\$W WKH HQG RI 'WHHQG@LQVFI 3JHXVLQRZVNL LQVWU  
WR FOLFN D K\SHUOLQN DW WKH ERWWRP RI WIRW ZHESDJH  
'HIHQG LQXWVQ HVV R S%IRIURW XIQFLVXIPISUVU OIHONF KWKKH PXVW V  
WKURXJK QXPHURXRUDXGGVXLVLRVDDOWIDDOWHIG HDUQLQJV FODLF

OWXÀ [REDACTED] VEUHHQVKRWV RI SXUSREIWHIGHSIGRDIQWV TI EXPLFOH VQW S SRUV  
FRQVXPHUV FOLFN RQ WKH K\SHUOLQN WR DSSO\ WKH\ DUH  
FRQVXPHUV I €P0WFÀDOV VSRUWI @ ð



VFDOLQJ WR KLJQ BQ DIQRWKMU' ZHRSDDM WEDLLPIVLW V DQ (
D 0RQWK) 25XUH 2QOLQH ,QFRPH (FRPPHUFH (PSLUH \$FDGH
3DWK ' WR VXFFHVV 'HIHQGDQWV FODLP WKDW WKH (FRPPH
WKDW FDQ KHOS SHRSOH RI DOO VNLOO ONLYPHOMQJFRVPR'RQ W
&RQVXPHUV ZKR SXUFKDVH WKH (FRPPHUFH W XPSLUH
SURJUDP WKDW L VQRUYHUDHQXFRPHSOH[ WKDQ 'HIHQGDQWV
SXUFKDVH V WXGVSORJUDP WDNHV PDQ\ KRXUV WR UHYLHZ
VLJQLILFDQW DPRXQWV RI WLPH DQG HIIRUW LPSOHPHQWLC
(YHQ D FOLHHDW DEOLVK WKHLU RZQ HFRPPHUFH VWRUH DQG I
IRU WKHP WRI WKLQW D HQDFWXDO DR DHE QM XDRG BWWDL QDQY HQ
VDOHV DQG UHYHQXHV DGYHUWLVHG RQ 'HIHQGDQWV V ZHEV

*Earnings Claims for Defendants' Business Opportunities and Self-Study Programs Are False or Unsubstantiated*

7KH FODLPV PDGH E\ 'HIHQGDQWV DQG KLJKOLJKW
XQVXEVWDQWLDWHG ,Q WUXWK WKH UHVXOWV GHVFULEHG
IURP W\SLFDO DQG 'HIHQGDQWV V UHSUHVHQWDWLRQV WKD
LQFRPH KDYH QR UHDVRQDEOH EDVLV

%\ WKHLU RZQ DGPLVLRQ 'HIHQGDQWV V DFFOND V XEV
WKDW WKHLU EXVLQHVV RSSRUWXQLWLHV RU VHOI VWXG\ S
PRQWK LQ DGGLWLRQDO LQFRPH

+LGGHQ DW WKH ERWRP RI RQH ZPER QD

7KLV DGPLVVLRQ LV QHLWKHU FOH DU QRU FRQVSLF  
FRQVXPHUV PXVW VFUROO WKURXJK QXPHURXV DGGLWLRQD  
SXUSRUWHG SURILWV DQG WHVWLPRQLDOV 7KLV VWDWHPH  
DJDLQVW D EODFN EDFNJURXQG









ULVNV LQYROYHG LQ WKH SXUFKDVH RI WKH EXVLQHVV RSS

'HIHQGDQWV DV GHVFULEHG PDGH HDUQLQJV FODLPV

FRQQHFWLRQ ZLWK WKH VDOH RI WKHLU EXVLQHVV RSSRUW

5XOH & ) 5 † I 8QGHU WKH %XVLQHVV 2SSRUWXQLW

3DQ\ RUDO ZULWWHQ RU YLVXDO UHSUHVHQWDWLRQ WR D

E\ LPSOLFDWLRQ D VSHFLILF OHYHO RU UDQJH RI DFWXDO

SURILWV ' & ) 5 † I

7KH %XVLQHVV 2SSRUWXQLW\ 5XOH SURKLELWV VHO

XQOHVV WKH VHOOHU KDV D UHDVRQDEOH EDVLV IRU W

SRVVHVLRQ ZULWWHQ PDWHULDOV WR VXEVDQWLDWH W

(DUQLQJV & ODLP VWDWHPHQW WR SURVSHFWLYH SXUFKDVH

FRQWDLQLQJ DPRQJ RWKHU WKLQJV LQIRUPDWLRQ UHJDUG

FODLP WKH FKDUDFWHULW\ & ODLP VWDWHPHQW WR SURVSHFWLYH

SXUFKDVHG WKH EXVLQHVV RSSRUWXQLW\ ZLWKLQ WKH WL

RI HDUQLQJV DQG PDNHV ZULWWHQ VXEVDQWLDWLRQ

SURVSHFWLYH SXUFKDVHU ZKR UHTXHVWV LW & ) 5 †

'HIHQGDQWV KDYH DOVR PDGH HDUQLQJV FODLPV L

EXVLQHVV RSSRUWXQLWLHV LQ WKH JHQHUDO PHGLD DV G

& ) 5 † K 8QGHU WKH %XVLQHVV 2SSRUWXQLW\ 5XOH

P€V LQVWUXPHQWDOLW\ WKURXJK ZKLFK D SHUVRQ P ÀVP

& ) 5 † A0D

HDUQLQJ FODLPV DQG VWDWHV LQ LPPHGLDWH FRQMXQFWL  
GDWHV ZKHQ WKH UHSUHVHQWHG HDUQLQJV ZHUH DFKLHYH  
SHUVRQV ZKR SXUFKDVHG 'HIHQGDQWV' EXVLQHVV RSSRUW  
DW OHDVW WKH VWDWHG OHYHO RI HDUQLQJV & ) 5 †  
3XUVXDQW WR 6HFWLRQ G RI WKH )7& \$FW  
WKH %XVLQHVV 2SSRUWXQLW\ 5XOH FRQVWLWXWHV DQG XQ  
FRPPHUFH LQ YLRODWLRQ RI 6HFWLRQ D RI WKH )7& \$FW

&2817 , ,

OLVUHSUHVHQWDWLRQV 5HJDUGLQJ ,QFRPH RU  
,Q QXPHURXV LQVWDQFHV LQ FRQQHFWLRQ ZLWK W  
EXVLQHVV RSSRUWXQLWLHV 'HIHQGDQWV KDYH PLVUHSUHV  
LQFRPH RU SURILWV D SURVSHFWLYH \$SIXRUFKDVH UH  
7KHUHIRUH 'HIHQGDQWV DFWV DQG SUDEWQDWLGHV  
WKH %XVLQHVV 2SSRUWXQLW\ 5XOH & ) 5 † G DQG  
† D

&2817 , , ,

(DUQLQJV &ODLPV WR 3URVSHFWLYH 3XUFKDVH  
,Q QXPHURXV LQVWDQFHV LQ FRQQHFWLRQ ZLWK W  
EXVLQHVV RSSRUWXQLWLHV 'HIHQGDQWV KDYH PDGH HDUG  
DPRQJ RWKHU WKLQJV ODFNLQJ D UHDVRQDEOH EDVLV





