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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**

14 _____)
FEDERAL TRADE COMMISSION,)
15)
Plaintiff,)
16)
v.)
17) Civil Action
YAD ABRAHAM, also known as) No.
18 TIM THORN and TIMOTHY THORN,)
individually and doing business as)
19 SHARP THORN INTERNET SOLUTIONS)
and INTERNEX, LLC.)
20) COMPLAINT FOR
INJUNCTIVE AND OTHER
21) RELIEF
Defendants.)
22 _____)

23 **COMPLAINT FOR INJUNCTIVE AND OTHER EQUITABLE RELIEF**
24 **Plaintiff, the Federal Trade Commission**
25 **("Commission"), by its undersigned**
26 **attorneys, for its complaint alleges:**

27 The Commission brings this action under Section 13(b) of the
28

1 insurance costs = less hassle and expense
2 overall.

3 f. Can I drive in my state if I am suspended in any
4 state? Yes, as a citizen of a country that
5 holds membership in the United Nations, you have
6 the right, as long as you are at least 18 years
7 old and possess the training and physical (and
8 mental) ability to safely operate motor vehicles
9 on the public roads.

10 g. Where can I drive with this International
11 Driver's License? The United Nations currently
12 has 189 Member Countries and you will be able to
13 drive legally in all of them except one. You
14 cannot drive with an International Drivers
15 License in the country of issue, which in this
16 case is the Bahamas.

17 h. We strongly recommend that you use your middle
18 and last name...if the name on the International
19 Driver License matches any DMV records you will
20 get points on your record if you get ticket.

21 i. You will be able to obtain auto insurance and
22 rent cars, too!

23 **Defendants also promote their international**
24 **driver's license via commercial email**
25 **solicitations directed to consumers. Much**
26 **of these email solicitations are unsolicited**

