

06-61429

CIV-ALTONAGA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. _____ -Civ- _____

MAGISTRATE JUDGE
TURNOFF

FILED BY _____
2006 SEP 21 PM 12:18
CLARENCE M. ...
S.D. OF FLA. ...

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

JUAN MATOS, individually and
doing business as QTX,
and BELINDA CURE,

Defendants.

COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiff, Federal Trade Commission ("FTC"), by its undersigned attorneys, for its
complaint alleges:

1. The FTC brings this action under Sections 13(b) and 19 of the Federal Trade
Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, and the Telemarketing and
Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. § 6101 *et seq.*, to
secure a permanent injunction, rescission of contracts and restitution, disgorgement of ill-gotten
gains, and other equitable relief against Defendants for engaging in deceptive acts or practices in
violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and for engaging in deceptive
telemarketing acts or practices in violation of the FTC's Trade Regulation Rule entitled
"Telemarketing Sales Rule" ("TSR"), 16 C.F.R. Part 310 as amended, in connection with the
advertising, marketing and sale of work-at-home business opportunities.

