



## THE PARTIES

4. **Plaintiff, the Federal Trade Commission**, is an independent agency of the United States government created by statute. 15 U.S.C. § 41 *et seq.* The Commission is charged, *inter alia*, with enforcement of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The Commission is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act in order to secure such equitable relief as may be appropriate in each case. 15 U.S.C. § 53(b).

5. **Defendant Asset Protection Group, Inc.** (hereinafter "APGI"), is a for-profit corporation with its principal place of business at 4601 W. Sahara Avenue, Suite I, Las Vegas, Nevada 89102. From 1999 to mid-2006, APGI offered and sold a training and business opportunity program throughout the United States, including to persons within this district. APGI has transacted business in this district.

6. **Defendant William S. Reed** (hereinafter "Reed") served as the Director and President of defendant APGI. At all times relevant to this Complaint, acting alone or in concert with others, Reed formulated, directed, controlled, or participated in the acts and practices of defendant APGI, including the acts and practices set forth in this Complaint. At all times relevant to this Complaint, Reed had the authority to control APGI and to supervise its agents.

7. Reed actively participated in promoting and marketing the APGI program to prospective purchasers throughout the United States. He reviewed and approved APGI's promotional materials. His name, picture, statements attributed to him, and his signature appeared in these promotional materials. Reed also promoted the APGI program via interstate

