

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

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In the Matter of	)	
	)	
	)	
LYLE R. LARSON,	)	DOCKET NO. C-3672
individually and doing business	)	
as MOMENTUM.	)	

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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Lyle R. Larson, individually and doing business as Momentum ("respondent"), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

**PARAGRAPH ONE:** Respondent Lyle R. Larson is an individual doing business as Momentum. His principal office or place of business is located at 3033 127th Place SE, Suite I-21, Bellevue, Washington 98005.

**PARAGRAPH TWO:** Respondent is engaged in the advertising, promotion, offering for sale, sale, and distribution of the CreditPlus credit repair product to the public.

**PARAGRAPH THREE:** The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

**PARAGRAPH FOUR:** Respondent has disseminated or has caused to be disseminated advertisements, including advertisements through the Internet, for the CreditPlus credit repair product. These advertisements include, but are not necessarily limited to, the attached Exhibit 1, which states, in part:

Don't Wait 7-10 Years!  
Legally Remove "Bad Marks" From Your Credit Report

\* \* \*

Even if your credit report doesn't contain an error, you can remove damaging entries. Let CreditPlus show you how!

\* \* \*

**Bankruptcies Removed!**

...Even if you've declared bankruptcy, this package will show you how to get it removed! Also removable are Judgements, Foreclosures, Tax Liens, Repossessions, Late Payments, etc!

\* \* \*

**Create a "NEW" Credit File!**

If you can't clean up your credit, CreditPlus will show you the secrets of obtaining a NEW credit file.... This is a little-known 100-percent effective method of erasing bad credit that is completely LEGAL under federal law.

**PARAGRAPH FIVE:** Through the use of the statements contained in the advertisements referred to in PARAGRAPH FOUR, including, but not necessarily limited to, the advertisement attached as Exhibit 1, respondent has represented, directly or by implication, that:

- A. Consumers can remove bankruptcies, judgments, foreclosures, liens, repossessions, late payments, and other adverse items of information from their credit reports even where such information is accurate and not obsolete; and
- B. Respondent's product whereby consumers create new credit files is legal.

**PARAGRAPH SIX:** In truth and in fact:

- A. Most consumers cannot remove bankruptcies, judgments, foreclosures, liens, repossessions, late payments, and other adverse items of information from their credit reports where such information is accurate and not obsolete; and
- B. Respondent's product whereby consumers create new credit files is not legal.

Therefore, the representations set forth in PARAGRAPH FIVE were, and are, false and misleading.

**PARAGRAPH SEVEN:** In the advertising, promotion, offering for sale, sale, and distribution of the CreditPlus credit repair product, including but not necessarily limited to the advertisement attached as Exhibit 1, respondent has represented that his product whereby consumers create new credit files is legal. Respondent has failed to disclose that consumers who follow respondent's product to create new credit files will violate federal criminal laws, including the federal law against making false statements on certain loan and credit applications,

the federal law against falsely representing one's social security number, and the federal law against making false statements to a department or agency of the United States. This fact would be material to consumers in their decision to purchase the CreditPlus credit repair product. The failure to disclose this fact, in light of the representation made, was, and is, a deceptive practice.

**PARAGRAPH EIGHT:** The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this 12th day of June, 1996, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

**SEAL:**