## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FEDERAL TRADE COMMISSION,	)
Plaintiff,	) Case No. 08 CV 5994
v.	) Judge Rebecca R. Pallmeyer
ADVANTAGE CREDIT REPAIR LLC, and	) Magistrate Judge Jeffrey Cole
MARK D. SOLOMON,	)
Defendants.	) )

## MOTION FOR TEMPORARY RESTRAINING ORDER WITH ASSET FREEZE AND OTHER EQUITABLE RELIEF AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), having filed its complaint in this matter seeking a permanent injunction and other relief, including rescission, restitution, and disgorgement, for consumers injured by defendants' unlawful practices, pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, Section 410(b) of the Credit Repair Organizations Act ("CROA"), 15 U.S.C. § 1679h(b), and Federal Rule of Civil Procedure 65(b), moves this Court for a temporary restraining order ("TRO") temporarily restraining defendants Advantage Credit Repair LLC and Mark D. Solomon from further violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the CROA, 15 U.S.C. §§ 1679-1679j, as alleged in the complaint.

WHEREFORE, the Federal Trade Commission respectfully requests that the Court grant its motion for a temporary restraining order, and enter the Commission's proposed Temporary Restraining Order.

Dated: October 20, 2008

Respectfully Submitted,

WILLIAM BLUMENTHAL General Counsel

s/ Marissa J. Reich
MARISSA J. REICH
DAVID A. O'TOOLE
Attorneys for Plaintiff
Federal Trade Commission
55 West Monroe Street, Suite 1825
Chicago, Illinois 60603
(312) 960-5634 (telephone)
(312) 960-5600 (facsimile)
Attorney Registration No. 6283816