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9 Attorney for Plaintiff
10 FEDERAL TRADE COMMISSION

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 FEDERAL TRADE COMMISSION,

14 Plaintiff,

15 v.

16 FRONTIER PUBLISHING, INC., a
17 corporation, also d/b/a American Data
18 Group; and

19 WILLIAM J. CLAYTON, individually
20 and as an officer of Frontier Publishing,
21 Inc.,

22 Defendants.

23 SACV11-01537 DOC (JPRx)

24 Case No.

25 COMPLAINT FOR PERMANENT
26 INJUNCTION AND OTHER
27 EQUITABLE RELIEF

28
FILED
2011 OCT -5 AM 10:37
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

18 Plaintiff, the Federal Trade Commission ("FTC"), for its complaint alleges:

19 1. The FTC brings this action under Section 13(b) of the Federal Trade
20 Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain permanent injunctive
21 relief, rescission of contracts, restitution, the refund of monies paid, disgorgement
22 of ill-gotten monies, and other equitable relief for Defendants' acts or practices in
23 connection with the selling of employment products or services in violation of
24 Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

25 JURISDICTION AND VENUE

26 2. This Court has subject matter jurisdiction pursuant to 28 U. S.C. §§
27 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

1 Section 4 of the FTC Act, 15 U.S.C. § 44.

2 **DEFENDANTS' BUSINESS PRACTICES**

3 8. Since at least 2007, Defendants have conducted a nationwide
4 advertising and telemarketing scheme to sell purported employment products or
5 services to consumers residing throughout the United States.

6 9. Defendants place classified advertisements in the employment
7 sections of local newspapers located throughout the United States. They also
8 place advertisements on employment websites, such as www.careerbuilder.com
9 and www.employmentguide.com. The advertisements announce the availability of
10 government jobs, and invite consumers to call for information. The following is
11 illustrative of Defendants' advertisements:

12 "FEDERAL AND STATE GOVERNMENT JOBS

13 Earn \$12.00 to \$48.00 Per Hour

- 14 • Full Medical and Dental Benefits
- 15 • Paid Training
- 16 • Job Security
- 17 • Career Positions

18 MANY FEDERAL/STATE POSITIONS HIRING NOW

19 In areas like Clerical, Administrative, Law Enforcement, Homeland
20 Security, Healthcare, Accounting, Finance, Public Relations,
21 Construction, Ecommerce, Aviation, Manufacturing, Transportation,
22 Wildlife/Park Service and more!

23 FT/PT available

24 Call Toll Free 7 Days

25 1-800-858-1517 EXT 1202"

26 10. When consumers call the telephone number, Defendants state that for
27 a \$69 fee, they can provide consumers with access to information, applications,
28 and job listings for all of the federal jobs, from entry level to advanced positions,

1 that are available in the consumer's geographic area. Many of Defendants'
2 telemarketers justify the \$69 fee by stating that consumers will receive federal job
3 listings that are not available to the general public because the United States does
4 not advertise the positions.

5 11. Defendants tell consumers that the pay for federal jobs ranges from
6 \$12 to \$48 per hour. Many of Defendants' telemarketers also tell consumers not
7 to worry about meeting the minimum job qualification requirements in the job
8 listing, because most or all of the federal jobs come with paid training for new
9 employees.

10 12. Defendants state that, once the consumer receives the materials, the
11 consumer simply needs to review them, find the federal job listings that interest
12 the consumer, and start applying. Many of Defendants' telemarketers also advise
13 that consumers can set up interviews for the jobs they are interested in by calling a
14 telephone number that Defendants will provide with the materials.

15 13. Defendants also tell consumers that they will provide practice
16 questions and answers for the "Federal Employment Test." Defendants state that
17 this material is important because the higher one scores on this test, the higher
18 one's starting pay will be. Many of Defendants' telemarketers state that this test is
19 required for most, if not all, federal jobs.

20 14. After receiving a consumer's payment, Defendants ship a packet of
21 information that includes (1) a one-page cover letter; (2) a spreadsheet containing
22 currently-open job listings within the customer's geographic area (typically the
23 consumer's home state); and (3) an approximately 119-page booklet titled
24 "Federal Employment Resource Workbook" ("the booklet").

25 15. The job information that Defendants provide to consumers is
26 available to the general public, free of charge, on www.usajobs.gov, the United
27 States government's official website for federal jobs. The www.usajobs.gov
28 website contains general information about all aspects of federal employment and

1 also provides detailed, up-to-date information for each open position, including the
2 position's duties, educational and other requirements, how and where to apply, and
3 whom to contact for more information.

4 16. Defendants' spreadsheet of job listings contains excerpts from
5 www.usajobs.gov. For each job listing, Defendants' spreadsheet provides only the
6 following information: (1) the position (*e.g.*, "Administrative Support Clerk"); (2)
7 the salary range (*e.g.*, "From \$25,797 to \$43,412 USD per year"); (3) the
8 announcement number (*e.g.*, "ADS07-R5-ADMNSUPPCLK-0405DP"); (4) the
9 location (*e.g.*, "US-Nationwide"); and (5) the contact person or organization (*e.g.*,
10 "ASC HCM Staffing"). The Defendants do not provide sufficient information for
11 consumers to determine their suitability for a position or instructions about
12 applying for any of the positions. Rather, the bottom of each page instructs
13 consumers to "Call our support team @ (805) 560-6102 for application
14 instructions on any of these positions or for additional research."

15 17. The Defendants' booklet contains general information about working
16 for the federal government, including pay and benefits, teleworking, programs for
17 students, and working overseas. The booklet also includes a brief description of
18 using www.usajobs.gov to identify actual job openings. The booklet also provides
19 a list of the names, addresses, and telephone numbers of state and local
20 employment offices.

21 18. The booklet also contains alleged sample questions and answers for
22 the United States Postal Service Test, as well as for a "Verbal Task Test" and a
23 "Clerical Task Test." The booklet states that most federal jobs do not require any
24 written test as a condition of employment.

25 19. When consumers call Defendants for further assistance with their job
26 search, Defendants' customer service department simply searches
27 www.usajobs.gov, and mails, faxes, or emails the search results to consumers.

1 **DEFENDANTS' VIOLATIONS OF THE FTC ACT**

2 20. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or
3 deceptive acts or practices in or affecting commerce.”

4 21. Misrepresentations or deceptive omissions of material fact constitute
5 deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

6 **COUNT I**

7 22. In numerous instances in connection with the advertising, marketing,
8 promotion, offering for sale or sale of employment products or services,
9 Defendants have represented, directly or indirectly, expressly or by implication,
10 that consumers who purchase Defendants' employment products or services are
11 highly likely to obtain employment with a federal agency, including, but not
12 limited to, by representing that

- 13 a. Defendants have access to federal job listings that are not
14 available to the general public;
- 15 b. Defendants will provide consumers with detailed listings of
16 currently available federal jobs, along with the information and
17 materials necessary to apply for those jobs;
- 18 c. Defendants will provide consumers with sample questions and
19 answers to improve their scores on the standardized
20 employment exams used by most or all federal agencies
21 mentioned in Defendants' ads and sales pitches; and
- 22 d. Most or all of the federal agencies in Defendants' ads and sales
23 pitches will hire individuals who lack the minimum stated
24 qualifications and will then provide paid training.

25 23. In truth and fact, in numerous instances in which Defendants have
26 made the representation set forth in Paragraph 22 of this Complaint, consumers
27 who purchase Defendants' employment products or services are not highly likely
28 to obtain employment with the Federal Government because, among other things,

- 1 a. All job listings and other information provided by Defendants
2 is readily available to the general public, at no charge, on
3 www.usajobs.gov;
- 4 b. Defendants do not provide consumers with detailed
5 information about currently available federal jobs or the
6 information necessary to apply for the position and, in most
7 cases, do not even identify the federal agencies offering the
8 positions;
- 9 c. Most federal agencies mentioned in Defendants' ads and sales
10 pitches do not require job applicants to take a standardized
11 employment exam to obtain employment; and
- 12 d. Most federal agencies mentioned in Defendants' ads and sales
13 pitches will not hire job applicants who lack the minimum
14 stated job qualifications.

15 24. Therefore, Defendants' representation as set forth in paragraph 22 is
16 false and misleading and constitutes a deceptive act or practice in violation of
17 Section 5(a) of the FTC Act, 15 U.S. C. § 45 (a).

18 **CONSUMER INJURY**

19 25. Consumers throughout the United States have been injured and will
20 continue to be injured by Defendants' violations of the FTC Act as set forth above.
21 In addition, Defendants have been unjustly enriched as a result of their unlawful
22 acts and practices. Absent injunctive relief by this Court, Defendants are likely to
23 continue to injure consumers, reap unjust enrichment, and harm the public interest.

24 **THIS COURT'S POWER TO GRANT RELIEF**

25 26. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this
26 Court to grant injunctive and other relief as the Court may deem appropriate to
27 halt violations of any provision of law enforced by the FTC. The Court, in the
28 exercise of its equitable jurisdiction, may award ancillary relief, including

1 rescission or reformation of contracts, restitution, the refund of moneys paid, and
2 the disgorgement of ill-gotten monies, to prevent and remedy any violation of any
3 provision of law enforced by the FTC.

4 **PRAYER FOR RELIEF**

5 Wherefore, Plaintiff, pursuant to Section 13(b) of the FTC Act, 15 U. S.C. §
6 53(b), and the Court's own equitable powers, requests that the Court:

- 7 A. Enter a permanent injunction to prevent future violations of the FTC
8 Act by Defendants;
- 9 B. Award such relief as the Court finds necessary to redress injury to
10 consumers resulting from Defendants' violations of the FTC Act,
11 including, but not limited to, the rescission or reformation of
12 contracts, restitution, the refund of monies paid, and the disgorgement
13 of ill-gotten monies; and
- 14 C. Award Plaintiff the costs of bringing this action, as well as such other
15 and additional relief as the Court may determine to be just and proper.

16
17 Dated: 10/4/11

Respectfully submitted,

18 WILLARD K. TOM
19 General Counsel

20 David M. Newman
21 DAVID M. NEWMAN
22 Attorney for Plaintiff
23 Federal Trade Commission
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> Federal Trade Commission	DEFENDANTS Frontier Publishing Co., Inc., and William J. Clayton
--------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) David M. Newman, Federal Trade Commission 901 Market Street, Suite 570, San Francisco, CA 94103 1-415-848-5100	Attorneys (If Known) Robert M. Sanger and Stephen K. Dunkle, Sanger & Swysen 125 East De La Guerra Street, Suite 102 Santa Barbara, CA 93101 1-805-962-4887
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II. BASIS OF JURISDICTION (Place an X in one box only.) <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:30%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:30%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
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Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify): _____
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 15 USC 45(a) and 53(b)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACTS	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

SACV11-01537 DOC (JPRx)

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Santa Barbara (both defendants)	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): Dart M. Newman Date 10/04/2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge David O. Carter and the assigned discovery Magistrate Judge is Jean P. Rosenbluth.

The case number on all documents filed with the Court should read as follows:

SACV11- 1537 DOC (JPRx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:
David M. Newman
Federal Trade Commission
901 Market Street, Suite 570
San Francisco, CA 94103

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission	CASE NUMBER SACV11-01537 DOC (JPRx)
<p style="text-align: center;">v.</p> <p style="text-align: center;">PLAINTIFF(S)</p> <p>Frontier Publishing Inc., and William J. Clayton</p> <p style="text-align: center;">DEFENDANT(S).</p>	<p style="text-align: center;">SUMMONS</p>

TO: DEFENDANT(S): Frontier Publishing, Inc., and William J. Clayton

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, David M. Newman, whose address is Federal Trade Commission, 901 Market Street, Suite 570, San Francisco, CA 94103. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court¹¹

Dated: October 5, 2011

By: A. De Avila



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].