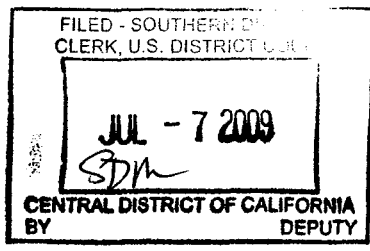


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14 Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

16 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
17 SOUTHERN DIVISION

18 FEDERAL TRADE COMMISSION,  
19  
20 Plaintiff,  
21 v.  
22 LUCASLAWCENTER "INCORPORATED",  
a corporation, also d/b/a Lucas Law Center;  
23 FUTURE FINANCIAL SERVICES, LLC,  
24 a limited liability company, also  
d/b/a Lucas Law Center;  
25 PAUL JEFFREY LUCAS,  
26 an individual;  
27 CHRISTOPHER FRANCIS BETTS,  
an individual; and  
28

SACV09-770 DOC(ANX)  
Case No.

COMPLAINT FOR  
INJUNCTIVE AND  
OTHER EQUITABLE  
RELIEF

*Lodged complaint & does 7/7 at 11:37*

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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANA

FILED

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15  
16 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
17 **SOUTHERN DIVISION**

18 **FEDERAL TRADE COMMISSION,**  
19  
20 Plaintiff,  
21 v.  
22 **LUCASLAWCENTER "INCORPORATED",**  
a corporation, also d/b/a Lucas Law Center;  
23 **FUTURE FINANCIAL SERVICES, LLC,**  
a limited liability company, also  
24 d/b/a Lucas Law Center;  
25 **PAUL JEFFREY LUCAS,**  
an individual;  
26 **CHRISTOPHER FRANCIS BETTS,**  
27 an individual; and  
28

Case No. SACV09-770 DOC(AN)

**COMPLAINT FOR  
INJUNCTIVE AND  
OTHER EQUITABLE  
RELIEF**

*20/15*

*Gov't def*

1 **FRANK SULLIVAN,**  
2 an individual,  
3 Defendants.

4 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

5 1. The FTC brings this action under Section 13(b) of the Federal Trade  
6 Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain temporary,  
7 preliminary, and permanent injunctive relief, rescission or reformation of contracts,  
8 restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other  
9 equitable relief for Defendants’ acts or practices in violation of Section 5(a) of the  
10 FTC Act, 15 U.S.C. § 45(a).

11 **JURISDICTION AND VENUE**

12 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
13 §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

14 3. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c), and  
15 15 U.S.C. § 53(b).

16 **PLAINTIFF**

17 4. Plaintiff FTC is an independent agency of the United States  
18 Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section  
19 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or  
20 practices in or affecting commerce.

21 5. The FTC is authorized to initiate federal district court proceedings, by  
22 its own attorneys, to enjoin violations of the FTC Act and to secure such equitable  
23 relief as may be appropriate in each case, including restitution and disgorgement.  
24 15 U.S.C. §§ 53(b), 56(a)(2)(A).

25 **DEFENDANTS**

26 6. Defendant LucasLawCenter “incorporated” (“Lucas Law Center”),  
27 also doing business as Lucas Law Center, is a California corporation with its  
28 principal place of business at 65 Enterprise, Aliso Viejo, California. Lucas Law

1 Center transacts or has transacted business in this District and throughout the  
2 United States. At all times material to this Complaint, acting alone or in concert  
3 with others, Lucas Law Center has advertised, marketed, or sold mortgage loan  
4 modification services to consumers throughout the United States.

5 7. Defendant Future Financial Services, LLC (“FFS”), also doing  
6 business as Lucas Law Center, is a limited liability company with its principal  
7 place of business at 65 Enterprise, Aliso Viejo, California. FFS transacts or has  
8 transacted business in this District and throughout the United States. At all times  
9 material to this Complaint, acting alone or in concert with others, FFS has  
10 advertised, marketed, or sold mortgage loan modification services to consumers  
11 throughout the United States.

12 8. Defendant Paul Jeffrey Lucas (“Lucas”) is the owner, CEO, CFO, and  
13 Secretary of Lucas Law Center and is also a director of Lucas Law Center. At all  
14 times material to this Complaint, acting alone or in concert with others, he has  
15 formulated, directed, controlled, had the authority to control, or participated in the  
16 acts and practices set forth in this Complaint. Defendant Lucas resides in this  
17 District and in connection with the matters alleged herein, transacts or has  
18 transacted business in this District and throughout the United States.

19 9. Defendant Christopher Francis Betts (“Betts”) is the owner and  
20 operator of FFS. At all times material to this Complaint, acting alone or in concert  
21 with others, he has formulated, directed, controlled, had the authority to control, or  
22 participated in the acts and practices set forth in this Complaint. Defendant Betts  
23 resides in this District and in connection with the matters alleged herein, transacts  
24 or has transacted business in this District and throughout the United States.

25 10. Defendant Frank Sullivan (“Sullivan”) is a supervisor and manager of  
26 FFS. At all times material to this Complaint, acting alone or in concert with others,  
27 he has formulated, directed, controlled, had the authority to control, or participated  
28 in the acts and practices set forth in this Complaint. Defendant Sullivan resides in

1 this District and in connection with the matters alleged herein, transacts or has  
2 transacted business in this District and throughout the United States.

3 11. Defendants Lucas Law Center and FFS (collectively, “Corporate  
4 Defendants”) have operated as a common enterprise while engaging in the  
5 deceptive acts and practices alleged below. Defendants have conducted the  
6 business practices described below through interrelated companies that have  
7 common managers, business functions, employees, and office locations. Because  
8 these Corporate Defendants have operated as a common enterprise, each of them is  
9 jointly and severally liable for the acts and practices alleged below. Individual  
10 Defendants Lucas, Betts, and Sullivan, acting individually or jointly, have  
11 formulated, directed, controlled, have the authority to control, or participated in the  
12 acts and practices of the Corporate Defendants that constitute the common  
13 enterprise.

14 **COMMERCE**

15 12. At all times material to this Complaint, Defendants have maintained a  
16 substantial course of trade in or affecting commerce, as “commerce” is defined in  
17 Section 4 of the FTC Act, 15 U.S.C. § 44.

18 **DEFENDANTS’ BUSINESS PRACTICES**

19 13. Since at least June 2008, Defendants have engaged in a course of  
20 conduct to advertise, market, offer to sell, and sell to consumers purported  
21 mortgage loan modification and foreclosure avoidance services. Defendants  
22 market their services under the name “Lucas Law Center.” Defendants market  
23 their services to homeowners who are in financial distress, delinquent on their  
24 mortgage loans, or in danger of losing their homes to foreclosure. Defendants  
25 charge consumers between \$2000 and \$3995 in up-front fees for their so called  
26 mortgage loan modification.

27 14. Defendants conduct an extensive advertising campaign through radio  
28 ads to promote their mortgage loan modification and foreclosure avoidance

1 services. Defendants' advertisements air on radio stations. These advertisements  
2 direct homeowners who are struggling to pay their mortgages to call Defendants'  
3 toll-free telephone number or to visit one of Defendants' Web sites:

4 [www.lucaslawcenter.com](http://www.lucaslawcenter.com) or [www.oclawoffices.us](http://www.oclawoffices.us).

5 15. Defendants' Web sites contain statements to induce consumers to  
6 purchase their mortgage loan modification and foreclosure avoidance counseling  
7 services, including:

- 8 a. We are able to get to the right people, the lenders' attorneys.  
9 We negotiate directly with the people at the lenders who can  
10 make decisions, and make the most logical ones for both the  
11 lender and the borrower.
- 12 b. You might never have heard of the Lucas Law Center, but the  
13 attorneys for Countrywide [Financial] have, and so have the  
14 attorneys for Wells Fargo [Home Mortgage], First Federal,  
15 Litton [Loan Servicing LP], Ocwen [Financial Corporation],  
16 Washington Mutual [Inc.], America's Servicing Company,,  
17 [sic] and many other large scale lenders and servicers. We are  
18 also known by many of the so-called "hard money lenders" who  
19 have taken advantage of our clients.
- 20 c. The Lucas Law Center working with their first class network of  
21 over 30 affiliated attorneys will help you save your home, and  
22 provide a financial solution that works for you, and your  
23 family.
- 24 d. To avoid falling victim to a predatory lender twice, we suggest  
25 hiring an attorney, whether our firm or another[.]
- 26 e. Our objective is simple: to utilize our intimate knowledge of  
27 Federal and Consumer Homeowner Laws to help our clients in  
28 this housing crisis that is threatening the American Dream.

- 1 f. Coupling his real estate experience with his insider  
2 understanding of how the mortgage industry works, Paul  
3 [Lucas] is in a unique position when dealing with lenders to  
4 negotiate better terms for his client's mortgages, and fight for  
5 borrowers whom have been mislead [sic], or otherwise  
6 defrauded by unscrupulous mortgage brokers, and lenders.
- 7 g. Our company specializes in resolutions of mortgage  
8 delinquencies or home foreclosure claims on behalf of you, the  
9 homeowner. We perform a detailed financial analysis and work  
10 with you to determine your best alternatives. We review your  
11 lender's loss mitigation policies and your state's foreclosure  
12 law to make sure that we give you the best service within the  
13 context of your situation. By working with you and your  
14 lender, we can tailor a resolution to meet your specific criteria  
15 and financial circumstance.
- 16 h. We have some of the most experienced and well respected  
17 specialists in the industry whose sole purpose is to save your  
18 house, not buy it, sell it, or send you into bankruptcy.
- 19 i. We specialize in out-of-court resolutions of government and  
20 nongovernment [sic] mortgage delinquencies or home  
21 foreclosure claims for homeowners.
- 22 j. We take care of all the paperwork and all of the negotiating.
- 23 k. Our staff has years of experience working with lenders and  
24 have the credibility and reputation to work with even the  
25 toughest lenders. We have contacts at most lenders and banks  
26 and will always be taken seriously.
- 27  
28



1           1.     We offer a money back guarantee if we cannot get you a work  
2                     out agreement with your lender(s) as long as no sale date has  
3                     been set.

4           16.    Both of the Web sites urge consumers to call the toll-free number, 888  
5 670-7370, for a “free” consultation.

6           17.    Consumers speak to Defendants’ representatives when they call the  
7 toll-free number provided in Defendants’ Internet or radio advertising, or when  
8 Defendants return the consumers’ calls.

9           18.    During the sales calls, Defendants’ representatives collect information  
10 from consumers, including details about the consumers’ mortgages and income.  
11 After consumers provide this information, the representatives often tell consumers  
12 they are candidates for a loan modification.

13           19.    Defendants’ representatives typically promise consumers that  
14 Defendants will help modify consumers’ mortgage loans to make their payments  
15 more affordable, and in numerous cases, representatives claim that they can  
16 prevent foreclosure.

17           20.    In numerous instances, Defendants’ representatives tell consumers  
18 that Defendants have a success rate in the ninetieth percentile with their lender.

19           21.    In numerous instances, Defendants’ representatives tell consumers  
20 that they will obtain a loan modification within a specified period of time, typically  
21 no more than a couple of months.

22           22.    Defendants’ representatives typically instruct consumers that they  
23 must pay a large portion of Defendants’ fee, usually half or more, up-front. The  
24 total fee ranges from \$2000 and \$3995.

25           23.    In numerous instances, Defendants’ representatives tell consumers  
26 that if they are not satisfied with Defendants’ service they are entitled to a full  
27 refund of the fees paid.

28



1           24. In numerous instances, after consumers pay Defendants' fee,  
2 Defendants fail to answer or return consumers' telephone calls or provide updates  
3 about the status of Defendants' purported communications with the consumers'  
4 lenders. In other instances, Defendants misrepresent to consumers that  
5 negotiations are proceeding smoothly. In other instances, Defendants misrepresent  
6 that lenders are the cause for delay. In numerous instances, Defendants make little,  
7 if any, effort to contact the lender.

8           25. In numerous instances, Defendants' representatives encourage  
9 consumers to stop paying their mortgages, telling consumers that delinquency will  
10 demonstrate the consumers' hardship to the lender and make it easier to obtain a  
11 loan modification. In some instances, Defendants advise consumers that lenders  
12 will not negotiate unless the consumers are at least a few months delinquent in  
13 their mortgage payments. In numerous other instances, Defendants advise  
14 consumers not to contact their lenders.

15           26. In numerous instances, Defendants fail to obtain mortgage loan  
16 modifications. In numerous instances, consumers learn from their lenders that  
17 Defendants have not contacted the lender or that Defendants have had only  
18 minimal, non-substantive contacts with the lender. Some consumers who paid for  
19 Defendants' services are able to obtain mortgage loan modifications and avoid  
20 foreclosure only through their own efforts and not because of any service provided,  
21 or promised, by Defendants.

22           27. In numerous instances, consumers who do not obtain loan  
23 modifications encounter difficulty in obtaining promised refunds. In many  
24 instances, consumers only receive refunds after making repeated requests or  
25 complaining to entities such as the Better Business Bureau, the California Attorney  
26 General, the California Bar, or the local criminal authority. In many instances,  
27 Lucas Law Center does not provide a refund or provides refunds substantially less  
28 than the consumer paid.

**VIOLATIONS OF SECTION 5 OF THE FTC ACT**

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

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

**Count I**

30. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification services to consumers throughout the United States, Defendants represent to consumers, directly or indirectly, expressly or by implication, that Defendants will obtain a mortgage loan modification in all or virtually all instances.

31. In truth and in fact, Defendants do not obtain a mortgage loan modification in all or virtually all instances.

32. Therefore, Defendants’ representation as set forth in Paragraph 30 of this Complaint is false and misleading and constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S. C. § 45(a).

**Count II**

33. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification services to consumers throughout the United States, Defendants represent to consumers, directly or indirectly, expressly or by implication, that Defendants will give full refunds to consumers if Defendants fail to obtain a modification of their loan.

34. In truth and in fact, in numerous instances in which Defendants have made the representations set forth in Paragraph 33 of this Complaint, Defendants do not give full refunds to consumers when Defendants fail to obtain a modification of their loan.

1 35. Therefore, Defendants' representation as set forth in Paragraph 33 of  
2 this Complaint is false and misleading and constitutes a deceptive act or practice in  
3 violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

4 **CONSUMER INJURY**

5 36. Consumers have suffered and will continue to suffer substantial injury  
6 as a result of Defendants' violations of the FTC Act. In addition, Defendants have  
7 been unjustly enriched as a result of their unlawful acts or practices. Absent  
8 injunctive relief by this Court, Defendants are likely to continue to injure  
9 consumers, reap unjust enrichment, and harm the public interest.

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

11 37. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court  
12 to grant injunctive and such other relief as the Court may deem appropriate to halt  
13 and redress violations of the FTC Act. The Court, in the exercise of its equitable  
14 jurisdiction, may award ancillary relief, including rescission or reformation of  
15 contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten  
16 monies, to prevent and remedy any violation of any provision of law enforced by  
17 the FTC.

18 **PRAYER FOR RELIEF**

19 Wherefore, Plaintiff Federal Trade Commission, pursuant to Section 13(b)  
20 of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests  
21 that the Court:

22 A. Award Plaintiff such preliminary injunctive and ancillary relief as  
23 may be necessary to avert the likelihood of consumer injury during the pendency  
24 of this action, and to preserve the possibility of effective final relief, including but  
25 not limited to temporary and preliminary injunctions, an order freezing assets and  
26 providing for immediate access, and appointment of a receiver;

27 B. Enter a permanent injunction to prevent future violations of the FTC  
28 Act by Defendants;

1 C. Award such relief as the Court finds necessary to redress injury to  
2 consumers resulting from Defendants' violations of the FTC Act, including but not  
3 limited to rescission or reformation of contracts, restitution, the refund of monies  
4 paid, and the disgorgement of ill-gotten monies; and


5 D. Award Plaintiff the costs of bringing this action, as well as such other  
6 and additional relief as the Court may determine to be just and proper.

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Respectfully submitted,

WILLARD K. TOM  
General Counsel

DEANYA T. KUECKELHAN  
Regional Director



Dated: July \_\_, 2009

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Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

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

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> FEDERAL TRADE COMMISSION	<b>DEFENDANTS</b> See Attachment 1  ORANGE COUNTY, CALIFORNIA 92656
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) See Attachment 2	Attorneys (If Known)

<b>II. BASIS OF JURISDICTION</b> (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)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.)  <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;">Citizen of This State</td> <td style="width:10%;"><b>PTF</b></td> <td style="width:10%;"><b>DEF</b></td> <td style="width:30%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;"><b>PTF</b></td> <td style="width:10%;"><b>DEF</b></td> </tr> <tr> <td></td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td></td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	<b>PTF</b>	<b>DEF</b>	Incorporated or Principal Place of Business in this State	<b>PTF</b>	<b>DEF</b>		<input type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	<b>PTF</b>	<b>DEF</b>	Incorporated or Principal Place of Business in this State	<b>PTF</b>	<b>DEF</b>																				
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<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.)  
 Action under 15 U.S.C. Sec. 53(b) to obtain temporary, preliminary and permanent injunctive relief against defendants to prevent deceptive acts and practices.

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

<b>OTHER STATUTES</b> <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	<b>CONTRACT</b> <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 <b>REAL PROPERTY</b> <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	<b>TORTS</b> <b>PERSONAL INJURY</b> <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 <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <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 <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <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	<b>PRISONER PETITIONS</b> <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 <b>FORFEITURE / PENALTY</b> <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	<b>LABOR</b> <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 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <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)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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**SACV09-770 DOC(ANX)**

**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
ALL DEFENDANTS: ORANGE COUNTY	

(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
ORANGE COUNTY, CALIFORNIA	

\* 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):  Date JULY 7, 2009

**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))



ATTACHMENT 1 TO CIVIL COVER SHEET

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13 (310) 824-4380 (fax)

14 Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

15  
16 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
17 SOUTHERN DIVISION

18 FEDERAL TRADE COMMISSION,

19 Plaintiff,

20 v.

21 LUCASLAWCENTER "INCORPORATED",  
22 a corporation, also d/b/a Lucas Law Center;

23 FUTURE FINANCIAL SERVICES, LLC,  
24 a limited liability company, also  
d/b/a Lucas Law Center;

25 PAUL JEFFREY LUCAS,  
an individual;

26 CHRISTOPHER FRANCIS BETTS,  
27 an individual; and  
28

Case No.

COMPLAINT FOR  
INJUNCTIVE AND  
OTHER EQUITABLE  
RELIEF



ATTACHMENT 1 TO CIVIL COVER SHEET

1 **FRANK SULLIVAN,** )  
 2 an individual, )  
 3 Defendants. )

4 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

5 1. The FTC brings this action under Section 13(b) of the Federal Trade  
 6 Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain temporary,  
 7 preliminary, and permanent injunctive relief, rescission or reformation of contracts,  
 8 restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other  
 9 equitable relief for Defendants’ acts or practices in violation of Section 5(a) of the  
 10 FTC Act, 15 U.S.C. § 45(a).

11 **JURISDICTION AND VENUE**

12 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
 13 §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

14 3. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c), and  
 15 15 U.S.C. § 53(b).

16 **PLAINTIFF**

17 4. Plaintiff FTC is an independent agency of the United States  
 18 Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section  
 19 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or  
 20 practices in or affecting commerce.

21 5. The FTC is authorized to initiate federal district court proceedings, by  
 22 its own attorneys, to enjoin violations of the FTC Act and to secure such equitable  
 23 relief as may be appropriate in each case, including restitution and disgorgement.  
 24 15 U.S.C. §§ 53(b), 56(a)(2)(A).

25 **DEFENDANTS**

26 6. Defendant LucasLawCenter “incorporated” (“Lucas Law Center”),  
 27 also doing business as Lucas Law Center, is a California corporation with its  
 28 principal place of business at 65 Enterprise, Aliso Viejo, California. Lucas Law

ATTACHMENT 2 TO CIVIL COVER SHEET  
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(310) 824-4343 (voice)

(310) 824-4380 (fax)

Attorneys for Plaintiff

FEDERAL TRADE COMMISSION

**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 Arthur Nakazato.

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

**SACV09- 770 DOC (ANx)**

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.

JAMES E. ELLIOTT  
jelliott@ftc.gov; Texas Bar No. 06557100  
Federal Trade Commission  
1999 Bryan Street, Suite 2150  
Dallas, Texas 75201  
(214) 979-9373 (See attached for other counsel)

**FOR OFFICE USE ONLY**

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

FEDERAL TRADE COMMISSION,  
  
PLAINTIFF(S)  
  
v.  
LUCASLAWCENTER "INCORPORATED",  
*A CORPORATION, ALSO D/B/A LUCAS LAW  
CENTER; SEE ATTACHED FOR OTHER DEFENDANTS*  
  
DEFENDANT(S).

CASE NUMBER  
**SACV09-770 DOC(ANX)**

**SUMMONS**

TO: DEFENDANT(S): \_\_\_\_\_

A lawsuit has been filed against you.

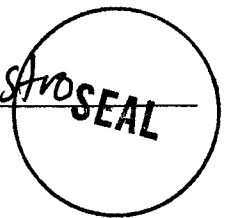
Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  \_\_\_\_\_ amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, James E. Elliott, whose address is Federal Trade Commission, SWR, 1999 Bryan St., Ste 2150, Dallas, Texas 75201. 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.

JUL -7 2009

Clerk, U.S. District Court

Dated: \_\_\_\_\_

By: Nancy Castro  
Deputy Clerk



**FOR OFFICE USE ONLY** *(Seal of the Court)*

[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)].

ATTACHMENT OF DEFENDANTS

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General Counsel

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14 Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

15  
16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

18 FEDERAL TRADE COMMISSION,  
19  
20 Plaintiff,  
21 v.  
22 LUCASLAWCENTER "INCORPORATED",  
a corporation, also d/b/a Lucas Law Center;  
23 FUTURE FINANCIAL SERVICES, LLC,  
24 a limited liability company, also  
d/b/a Lucas Law Center;  
25 PAUL JEFFREY LUCAS,  
an individual;  
26 CHRISTOPHER FRANCIS BETTS,  
27 an individual; and  
28

Case No.

COMPLAINT FOR  
INJUNCTIVE AND  
OTHER EQUITABLE  
RELIEF

1 **FRANK SULLIVAN,**  
2 an individual,

3 Defendants.

4 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

5 1. The FTC brings this action under Section 13(b) of the Federal Trade  
6 Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain temporary,  
7 preliminary, and permanent injunctive relief, rescission or reformation of contracts,  
8 restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other  
9 equitable relief for Defendants’ acts or practices in violation of Section 5(a) of the  
10 FTC Act, 15 U.S.C. § 45(a).

11 **JURISDICTION AND VENUE**

12 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
13 §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

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15 15 U.S.C. § 53(b).

16 **PLAINTIFF**

17 4. Plaintiff FTC is an independent agency of the United States  
18 Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section  
19 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or  
20 practices in or affecting commerce.

21 5. The FTC is authorized to initiate federal district court proceedings, by  
22 its own attorneys, to enjoin violations of the FTC Act and to secure such equitable  
23 relief as may be appropriate in each case, including restitution and disgorgement.  
24 15 U.S.C. §§ 53(b), 56(a)(2)(A).

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26 6. Defendant LucasLawCenter “incorporated” (“Lucas Law Center”),  
27 also doing business as Lucas Law Center, is a California corporation with its  
28 principal place of business at 65 Enterprise, Aliso Viejo, California. Lucas Law

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