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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

FORTUNA ALLIANCE, L.L.C., *et al.*,

Defendants.

Civ. No. **C96-799M**

**APPLICATION FOR ORDER
TO SHOW CAUSE WHY
CONTEMPT SHOULD NOT BE
FOUND AND SANCTIONS
IMPOSED**

Date: To be determined

Plaintiff, the Federal Trade Commission ("FTC"), applies to this Court for an Order to Show Cause Why Contempt Should Not Be Found and Sanctions Imposed against defendants Fortuna Alliance, L.L.C., Augustine Delgado, Libby Gustine Grant, and Donald Grant, and against non-defendant Robert O. Sailer pursuant to FRCP Rule 65(d), for serious and ongoing violations of the Stipulated Final Judgment and Order as to Certain Defendants that this Court ("Order") entered on February 24, 1996.

The violations include defendants' failure to pay \$2 million due for refunds to injured consumers; defendants' refusal to provide compliance monitoring materials; and defendants' and Mr. Sailer's making misrepresentations about the meaning and effect of the Order in order to

1 further Fortuna's business. The FTC has provided a Memorandum with exhibits in support of this
2 application and a proposed contempt order.

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4 Respectfully submitted,

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12 Attorney for Plaintiff
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