

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

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In the Matter of	)	
	)	
MARTHA CLARK,	)	DOCKET NO. C-3667
individually and doing business	)	
as SIMPLEX SERVICES	)	

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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Martha Clark, individually and doing business as Simplex Services ("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 Martha Clark is an individual doing business as Simplex Services. Her principal office or place of business is located at 135 Kipp U., P.O. Box 36, Niverville, New York 12130.

**PARAGRAPH TWO:** Respondent is engaged in the advertising, promotion, offering for sale, sale, and distribution of the Guaranteed Credit Doctor 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 Guaranteed Credit Doctor credit repair product. These advertisements include, but are not necessarily limited to, the attached Exhibit 1, which states, in part:

Guaranteed Credit Repair

\* \* \*

The "GUARANTEED CREDIT DOCTOR" is a very unique program designed to enable ANYONE to remove unwanted items from their credit report.

\* \* \*

Not only will you learn how to remove unwanted items from your credit file -- you will also learn step-by-step how to establish a truly rock solid AA credit rating!

\* \* \*

You will learn exactly, step-by-step:

How to remove derogatory information from your credit file at all major credit bureaus ...

How to remove judgments, including BANKRUPTCY from your credit file!

**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 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.

**PARAGRAPH SIX:** In truth and in fact, 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. Therefore, the representation set forth in PARAGRAPH FIVE was, and is, false and misleading.

**PARAGRAPH SEVEN:** 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 10th day of June, 1996, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

**SEAL:**