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CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA  
2004 SEP 17 AM 8:13

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA**

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STATE OF IOWA ex rel. Thomas J. Miller, Attorney General of Iowa	)	
	)	
Plaintiff,	)	<b>4:04-CV-90507</b>
v.	)	Civil No.
	)	
TELEDRAFT, INC., a Delaware corporation,	)	
	)	
AL SLATEN, individually and in his corporate capacity, and	)	COMPLAINT FOR INJUNCTIVE AND OTHER EQUITABLE RELIEF
	)	
DAN WOLFE, individually and in his corporate capacity,	)	
	)	
Defendants.	)	

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The State of Iowa ex rel. Thomas J. Miller, Attorney General of Iowa, through the undersigned Assistant Attorney General, for its Complaint against Defendants alleges as follows.

**INTRODUCTION**

Defendants play a vital role in various predatory telemarketing schemes, enabling the telemarketers to extract money from the checking accounts of their typically elderly