IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION, **STATE OF CONNECTICUT,** **OFFICE OF ATTORNEY GENERAL, and** **COMMONWEALTH OF PENNSYLVANIA,** **OFFICE OF ATTORNEY GENERAL,** **Plaintiffs,** **v.** **CLICK4SUPPORT, LLC,** **a Connecticut limited liability company,** **ISOURCEUSA LLC,** **also d/b/a Click4Support and UBERTECHSUPPORT,** **a Pennsylvania limited liability company,** **INNOVAZION INC.,** **also d/b/a Click4Support Tech Services, a Connecticut corporation,** **SPANNING SOURCE LLC,** **also d/b/a Click4Support,** **a Pennsylvania limited liability company,** **BRUCE BARTOLOTTA,** **also known as Bruce Bart, individually and as an owner and officer of Click4Support, LLC and Innovazion Inc.,**	**CIVIL ACTION NO. 15-5777** **AMENDED COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

GEORGE SAAB,
individually and as an owner and officer of iSourceUSA LLC and Spanning Source LLC,

CHETAN BHIKHUBHAI PATEL,
individually and as an owner and officer of iSourceUSA LLC and Spanning Source LLC,

NIRAJ PATEL,
individually and as an owner of iSourceUSA LLC and Spanning Source LLC,

INNOVAZION RESEARCH PRIVATE LIMITED,
an Indian corporation,

ABHISHEK GAGNEJA,
individually, as an owner of Click4Support, LLC, and as an owner and officer of Innovazion Inc. and Innovazion Research Private Limited, and

RISHI GAGNEJA,
individually and as an officer of Innovazion Inc. and Innovazion Research Private Limited,

Defendants.

Plaintiffs, the Federal Trade Commission ("FTC"), the State of Connecticut, Office of Attorney General, and the Commonwealth of Pennsylvania, Office of Attorney General, for their Amended Complaint allege:

1. The FTC brings this action under Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b, and the Telemarketing and Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. §§ 6101-6108, to

obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants' acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and in violation of the FTC's Trade Regulation Rule entitled "Telemarketing Sales Rule" ("TSR"), 16 C.F.R. Part 310.

2. The State of Connecticut, by and through George Jepsen, the Attorney General of Connecticut, acting at the request of the Commissioner of the Connecticut Department of Consumer Protection, brings this action under the Connecticut Unfair Trade Practices Act ("CUTPA"), Chapter 735a of the Connecticut General Statutes, and more particularly Conn. Gen. Stat. § 42-110m, to obtain injunctive relief against the Defendants' alleged violations of Conn. Gen. Stat. § 42-110b(a), and to obtain other relief as is necessary to redress injury to consumers resulting from the Defendants' violations of law.

3. The Commonwealth of Pennsylvania, acting by First Deputy Bruce R. Beemer, through the Bureau of Consumer Protection, brings this action pursuant to Section 201-4 of the Pennsylvania Unfair Trade Practices and Consumer Protection Law ("Pa UTPCPL") to restrain, by temporary or permanent injunction, any unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce declared unlawful by Sections 201-2(4)(i) through (xxi) of the Pa UTPCPL and to obtain restitution, as this Court deems appropriate, pursuant to 73 Pa. Cons. Stat. § 201-4.1.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a), 53(b), and 1693o(c).

5. This Court has supplemental jurisdiction over Plaintiff State of Connecticut's claims based upon CUTPA, pursuant to 28 U.S.C. § 1367.

6. This Court has supplemental jurisdiction over Plaintiff Commonwealth of Pennsylvania's claims based upon Pa UTPCPL, pursuant to 28 U.S.C. § 1367.

7. Venue is proper in this district under 28 U.S.C. § l 391(b) and (c) and 15 U.S.C. § 53(b).

PLAINTIFFS

8. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Telemarketing Act, 15 U.S.C. §§ 6101-6108. Pursuant to the Telemarketing Act, the FTC promulgated and enforces the TSR, 16 C.F.R. Part 310, which prohibits deceptive and abusive telemarketing acts or practices.

9. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and the TSR and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b), 56(a)(2)(A), 56(a)(2)(B), 57b, 6102(c) and 6105(b).

10. The State of Connecticut, through its Attorney General and acting at the request of its Commissioner of Consumer Protection, is authorized to initiate proceedings to enjoin violations of CUTPA and to seek injunctive relief, restitution, and other relief as this Court deems appropriate. Conn. Gen. Stat. § 42-110m.

11. The Commonwealth of Pennsylvania, through its Attorney General, is authorized to initiate proceedings in the public interest to restrain unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce, seek restitution, and any other relief, as this Court deems appropriate. 73 Pa. Cons. Stat. §§ 201-4, 201-4.1, and 201-9.

DEFENDANTS

Corporate Defendants

12. Defendant Click4Support, LLC ("C4S-CT") is a Connecticut limited liability company with its principal place of business at 12 Main Street, Suite 1, Essex, Connecticut. C4S-CT is owned and operated by Defendants Bruce Bartolotta and Abhishek Gagneja, and it is also operated by Defendant George Saab. C4S-CT uses www.click4support.net, www.ubertechsupport.com, and www.tekdex.com as its business websites. C4S-CT transacts or has transacted business in this district and throughout the United States. At all times material to this Amended Complaint, acting alone or in concert with others, C4S-CT has advertised, marketed, distributed, or sold computer security or technical support services to consumers throughout the United States.

13. Defendant iSourceUSA LLC, also doing business as "Click4Support" and "UBERTECHSUPPORT," ("iSourceUSA") is a Pennsylvania limited liability company with its principal place of business at 12 Penns Trail, Suite 12200, Newtown, Pennsylvania. iSourceUSA is owned and operated by individual Defendants George Saab, Chetan Bhikhubhai Patel, and Niraj Patel and by corporate Defendants Innovazion Inc. and Spanning Source LLC. iSourceUSA also uses or has used the following addresses: (1) 3220 Tillman Drive, Suite 504, Bensalem, Pennsylvania; (2) 853 Second Street Pike, Suite B107, Richboro, Pennsylvania; (3) Silver Lake Executive Campus, 41 University Drive, Suite 400, Newtown, Pennsylvania; and

(4) 22 Cornwell Drive, Bridgeton, New Jersey. iSourceUSA uses www.click4support.com and www.ubertechsupport.com as its business websites. iSourceUSA transacts or has transacted business in this district and throughout the United States. At all times material to this Amended Complaint, acting alone or in concert with others, iSourceUSA has advertised, marketed, distributed, or sold computer security or technical support services to consumers throughout the United States. During at least March 2014 to July 2015, iSourceUSA processed credit and/or debit card payments by consumers, who purchased Defendants' computer security or technical support services, through at least one merchant account established in its name.

14. Defendant Innovazion Inc., also doing business as "Click4Support Tech Services," ("Innovazion US") is a Connecticut corporation with its principal place of business at 12 Main Street, Suite 1, Essex, Connecticut. Innovazion US is owned and/or operated by Defendants Bruce Bartolotta, Abhishek Gagneja, and Rishi Gagneja, and it is a corporate owner of iSourceUSA. Innovazion US also uses or has used two addresses in Albertson, New York that appear to be personal residences. Innovazion US uses www.c4sts.com and www.tekdex.com as its business websites. Innovazion US transacts or has transacted business in this district and throughout the United States. At all times material to this Amended Complaint, acting alone or in concert with others, Innovazion US has advertised, marketed, distributed, or sold computer security or technical support services to consumers throughout the United States.

15. Defendant Spanning Source LLC, also doing business as "Click4Support," ("Spanning Source") is a Pennsylvania limited liability company with its principal place of business at 853 Second Street Pike, Suite B107, Richboro, Pennsylvania. It is owned and operated by Defendants George Saab, Chetan Bhikhubhai Patel, and Niraj Patel, and it is a corporate owner of iSourceUSA. Spanning Source also uses or has used the following

addresses: (1) 3220 Tillman Drive, Suite 504, Bensalem, Pennsylvania; (2) Silver Lake Executive Campus, 41 University Drive, Suite 400, Newtown, Pennsylvania; (3) 120 Gibraltar Road, Suite 315, Horsham, Pennsylvania; and (4) 22 Cornwell Drive, Bridgeton, New Jersey. Spanning Source also uses or has used addresses in Newtown, Pennsylvania, New Hope, Pennsylvania, and Stow, Massachusetts that appear to be personal residences. Spanning Source uses www.click4support.com, www.click4support.net, www.ubertechsupport.com, and www.tekdex.com as its business websites. Spanning Source transacts or has transacted business in this district and throughout the United States. At all times material to this Amended Complaint, acting alone or in concert with others, Spanning Source has advertised, marketed, distributed, or sold computer security or technical support services to consumers throughout the United States. During at least June 2012 to November 2014, Spanning Source processed credit and/or debit card payments by consumers, who purchased Defendants' computer security or technical support services, through at least two merchant accounts established in its name.

16. Defendant Innovazion Research Private Limited ("Innovazion India") is an Indian corporation with its principal place of business in New Delhi, India. Innovazion India is owned by Defendant Abhishek Gagneja, who also serves as its chief executive officer. Defendant Rishi Gagneja serves as its director. Innovazion India transacts or has transacted business in this district and throughout the United States. At all times material to this Amended Complaint, acting alone or in concert with others, Innovazion India has advertised, marketed, distributed, or sold computer security or technical support services to consumers throughout the United States.

Individual Defendants

17. Defendant Bruce Bartolotta, also known as "Bruce Bart," ("Bartolotta") resides in Deep River, Connecticut. He is an owner, officer, and registered agent of C4S-CT. He is an owner, chief financial officer, secretary, director, and registered agent of Innovazion US. Through Innovazion US, he owns iSourceUSA. At all times material to this Amended Complaint, acting alone or in concert with others, Bartolotta has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Amended Complaint. In connection with the matters alleged herein, Bartolotta transacts or has transacted business in this district and throughout the United States.

18. Defendant George Saab ("Saab") resides in Stow, Massachusetts. He is an owner and officer of iSourceUSA and Spanning Source, and he is a business manager of C4S-CT. At all times material to this Amended Complaint, acting alone or in concert with others, Saab has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Amended Complaint. In connection with the matters alleged herein, Saab transacts or has transacted business in this district and throughout the United States.

19. Defendant Chetan Bhikhubhai Patel ("C. Patel") resides in Newtown, Pennsylvania. He is an owner and officer of iSourceUSA and Spanning Source. At all times material to this Amended Complaint, acting alone or in concert with others, C. Patel has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Amended Complaint. In connection with the matters alleged herein, C. Patel transacts or has transacted business in this district and throughout the United States.

20. Defendant Niraj Patel ("N. Patel") resides in New Hope, Pennsylvania. He is an owner and officer of iSourceUSA and Spanning Source. At all times material to this Amended

Complaint, acting alone or in concert with others, N. Patel has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Amended Complaint. In connection with the matters alleged herein, N. Patel transacts or has transacted business in this district and throughout the United States.

21. Defendant Abhishek Gagneja ("A. Gagneja") resides in India. He is an owner of C4S-CT and an owner and officer of Innovazion US and Innovazion India. At all times material to this Amended Complaint, acting alone or in concert with others, A. Gagneja has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Amended Complaint. In connection with the matters alleged herein, A. Gagneja transacts or has transacted business in this district and throughout the United States.

22. Defendant Rishi Gagneja ("R. Gagneja") resides in India. He is an officer of Innovazion US and Innovazion India. At all times material to this Amended Complaint, acting alone or in concert with others, R. Gagneja has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Amended Complaint. In connection with the matters alleged herein, R. Gagneja transacts or has transacted business in this district and throughout the United States.

Common Enterprise

23. Defendants C4S-CT, iSourceUSA, Innovazion US, Spanning Source, and Innovazion India (collectively, "Corporate Defendants") have operated as a common enterprise while engaging in the illegal acts and practices alleged in this Amended Complaint. The Corporate Defendants conduct business through interrelated companies that share owners, officers, and office locations and addresses. They share business websites, telephone numbers, and employees when soliciting consumers and dealing with third parties. Further, they share at

least some bank accounts and commingle funds. Because the Corporate Defendants have operated as a common enterprise, each is jointly and severally liable for the acts and practices of all of them.

24. Defendants Bartolotta, Saab, C. Patel, N. Patel, A. Gagneja, and R. Gagneja (collectively, "Individual Defendants") have formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the Corporate Defendants that constitute the common enterprise.

Assisting and Facilitating

25. In addition to the Defendants' participation in the common enterprise, Defendants Spanning Source, iSourceUSA, Saab, C. Patel, and N. Patel assisted and facilitated the telemarketing practices of Defendants C4S-CT, Innovazion US, Innovazion India, Bartolotta, A. Gagneja, and R. Gagneja.

COMMERCE

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

DEFENDANTS' BUSINESS PRACTICES

Overview of Defendants' Technical Support Services Scheme

27. Defendants operate a telemarketing scheme that deceives consumers into spending up to thousands of dollars for unnecessary computer security or technical support services (collectively, "technical support services"). Since at least 2012, Defendants have bilked millions of dollars from consumers throughout the United States. To achieve this, Defendants call consumers or trick consumers into calling their telemarketing boiler rooms, and then they make consumers believe that they are part of or affiliated with well-known U.S. technology

companies, such as Microsoft, Google, Apple, or Dell. Once they get control over consumers' computers, Defendants scare consumers into believing that their computers are infected with viruses, spyware, or other malware, are being hacked, or are otherwise compromised. Then, Defendants peddle their technical support services and charge consumers up to thousands of dollars.

Defendants Lure Consumers to Purchase Their Services

28. Since at least 2012, Defendants have placed internet advertisements ("internet ads") that appear as search results generated by internet search engines, such as Google. When consumers conduct web searches concerning their technology issues using one of these search engines, Defendants' internet ads have appeared. In a number of instances, consumers dialed the telephone number displayed in the internet ads and were connected to Defendants' telemarketers.

29. Defendants have also used popup warning messages ("popups") that appear on consumers' computer screens when consumers are browsing the internet. The popups advise consumers that there is a problem with their computers, such as a virus, malware, or some other vulnerability. The popups instruct consumers to call the telephone number listed in order to resolve the purported problem. In a number of instances, consumers dialed the telephone number listed on the popups and were connected to Defendants' telemarketers.

30. In other instances, Defendants have called consumers, including prospective and existing customers. For example, in Spring 2015, Defendants undertook an outreach campaign to sign up thousands of their existing customers for additional services.

31. Once consumers are connected to Defendants, they explain their technology issues to Defendants' telemarketers, who assure them that Defendants can fix the issues. In other instances, Defendants tell consumers that they have detected an issue concerning the consumers'

computers which purportedly prompted the calls to the consumers. In a number of instances, the telemarketers do not voluntarily disclose to consumers the real identity of their company. In other instances, when questioned by consumers, the telemarketers claim that they are a part of or affiliated with well-known U.S. technology companies, such as Microsoft, Google, Apple, or Dell.

32. None of the Defendants are part of or affiliated with these well-known U.S. technology companies.

33. After convincing consumers that they are dealing with a legitimate business, Defendants' telemarketers tell consumers that they need to remotely access the consumers' computers in order to identify and resolve their technology issues. The telemarketers direct consumers to go to a website, enter a code, and follow the prompts to begin the remote access session. Once Defendants gain remote access, they are able to control the consumers' computers. For example, Defendants can view the computer screen, move the mouse or cursor, enter commands, run applications, and access stored information, among other things. At the same time, consumers can see what Defendants are seeing and doing on their computers.

34. Defendants perform various commands and actions on the computers purportedly to identify the cause of the consumers' technology issues. Then, they misrepresent to consumers that the computers are infected with viruses, spyware, or other malware or that hackers are present in their computers.

35. A common ploy that Defendants use to scare consumers into purchasing unneeded technical support services is to show consumers numerous "Error" and "Warning" messages in the computer's Event Viewer. For example, Attachment A is a screenshot of an FTC computer, taken during an undercover transaction conducted on June 3, 2015, showing

Defendants' use of the Event Viewer. The telemarketer drew the circles on the screen to highlight a number of errors and warnings in the computer and claimed that these are evidence of computer problems. In fact, the FTC computer used during this undercover transaction was free of viruses, spyware, malware, or other security issues at the time of the undercover transaction.

36. Another trick is to use the computer's System Configuration to show consumers that computer problems have caused a number of Windows services to stop working. For example, Attachment B is a screenshot of the same FTC computer, taken from the same June 3, 2015 undercover transaction, showing Defendants' use of the System Configuration. The telemarketer prompted the System Configuration window to show a number of such "Stopped" services.

37. Yet another ploy is to direct consumers to the computer's Internet Properties to show that there are questionable certificates in the computer's Certificates window. Defendants claim that these certificates—some labeled "Untrusted" or "Fraudulent"—are evidence of hacking or security breaches. For example, Attachments C and D are screenshots of the same FTC computer, taken from the same June 3, 2015 undercover transaction, showing Defendants' use of Internet Properties and the Certificates window. The telemarketer drew the circles to highlight a number of "Untrusted" and "Fraudulent" certificates in the Certificates window and claimed that these are evidence of "security breaches."

38. It is impossible to know whether a computer is infected with malware, is being hacked, or is otherwise compromised based solely on the fact that the computer's Event Viewer contains "Error" and "Warning" messages, or the fact that System Configuration lists a number of "Stopped" services, or the fact that the Certificates window within Internet Properties displays "Untrusted" or "Fraudulent" certificates. In fact, while "Error" and "Warning" messages appear

alarming, it is normal for a Windows system to collect hundreds or thousands of such messages in the course of normal operations. Similarly, it is normal for Windows services that are not needed to be designated as "Stopped," and this in no way indicates that there is a problem on the system. Further, despite the "Untrusted" and "Fraudulent" labels that appear threatening, the certificates are, in fact, designed to help protect consumers from giving their information to an untrusted web server and are incorporated into any properly configured, up-to-date Windows system.

39. Nevertheless, Defendants tell consumers about the risks posed by viruses, spyware, malware, and hackers, and they use the messages described in Paragraphs 35 through 37 to underscore the urgent need for consumers to get the computers repaired. Defendants then peddle their technical support services to consumers that could include a one-time "fix" and/or a long-term service plan. The purported services include, among other things, correcting error and warning messages, installing security software, cleaning up the computer of adware, malware, and spyware, performing a "tune up" or "optimization" of the computer, restarting Microsoft services and reinstalling drivers, creating a backup of the computer, and promising to provide continuous monitoring of the computers and round-the-clock support.

40. After convincing consumers that they need these technical support services, Defendants' telemarketers obtain consumers' payment information and then direct consumers to Defendants' website to complete the purchase transactions. After charging consumers, the telemarketers transfer the remote access session to Defendants' technicians to perform the "repairs."

41. In some instances, Defendants' technicians deleted innocuous computer files, which the telemarketers falsely claimed were the cause or the evidence of consumers' computer

vulnerabilities. This does not actually improve the security of the computer and could even adversely affect the computer's performance.

42. In other instances, Defendants' technicians caused negative impact on the computers during the "repair" process. For example, in some instances, the technicians removed consumers' antivirus and security software already installed on the computers and replaced it with some other programs. In at least one instance, the technician uninstalled a program designed to provide automatic updates to the computer's web browser, including security-related updates. In another instance, the technician disabled built-in Windows notification systems designed to send consumers "Security messages" and "Maintenance messages" about their computers. For example, Attachments E and F are screenshots of the same FTC computer, taken from the same June 3, 2015 undercover transaction, showing the Defendants' technician turning off the Windows notification systems. Attachment E is a screenshot before the technician disabled the notification systems, and it shows that the boxes for "Virus protection," "Windows Backup," "Windows Troubleshooting," and "Check for updates" are still checked. Attachment F is a screenshot after the technician disabled the notification systems, and it shows that the four boxes are unchecked shortly before the technician clicked "OK."

43. Defendants charge up to thousands of dollars for technical support services that consumers do not need. In some instances, Defendants did not fix the real technology issues for which consumers unwittingly called Defendants. In other instances, Defendants' actions rendered consumers' computers worse off or more vulnerable.

Overview of Merchant Accounts and Credit Card Laundering

44. A merchant account is a type of account that allows businesses to process consumer purchases by a credit or debit card. Merchant accounts are available through financial institutions called merchant acquiring banks or "acquirers."

45. Without access to a merchant acquiring bank that is a member of the credit card associations, such as MasterCard or VISA, a company is not able to accept consumer credit or debit card payments.

46. Before a merchant account is established, the company has to meet the bank's underwriting criteria. The company may be denied a merchant account because the bank concludes that the company applying for the merchant account is too much of a risk. For example, the bank may conclude that the company might be at risk of operating in an illegal way or might be concerned that the company will generate excessive rates of transactions returned by consumers ("chargebacks").

47. If the company is not able to obtain a merchant account or does not wish to use its own name to establish a merchant account, the company may resort to an unlawful business practice known as credit card laundering. Specifically, the company may recruit another company (that does have a merchant account or that can readily open a merchant account) to act as a "front" so the company can process credit card transactions through the recruited company's merchant account. This practice allows the company to bypass the underwriting of the acquiring bank, a critical process designed to detect and deter fraud and assess the risks posed by the company's activities.

Role of Merchant Accounts in the Scheme

48. During the time that Defendants' technical support services scam operated, Defendants iSourceUSA, Spanning Source, Saab, C. Patel, and N. Patel (collectively, the "Processor Defendants") also acquired and maintained a series of merchant accounts with different acquiring banks.

49. According to merchant agreements entered into by the Processor Defendants with acquiring banks, the merchant accounts were to be used to process transactions between the Processor Defendants and consumers. The merchant agreements did not authorize the Processor Defendants to submit credit and debit card payments that resulted from transactions between consumers and any other entity or person.

50. In truth, by agreement among the Defendants, the Processor Defendants used these merchant accounts to process payments related to telemarketing transactions between consumers and Defendants C4S-CT, Innovazion US, Innovazion India, Bartolotta, A. Gagneja, and R. Gagneja (collectively, the "Provider Defendants").

51. For example, in June 2012, the Processor Defendants obtained a merchant account in the name of Spanning Source. They used this account to process payments related to telemarketing transactions between consumers and the Provider Defendants until February 2014, when the bank terminated the account due to excessive chargebacks.

52. In February 2014, the Processor Defendants obtained another merchant account in the name of Spanning Source from a different acquiring bank. They used this account to process payments related to telemarketing transactions between consumers and the Provider Defendants until November 2014, when the bank terminated the account, again due to excessive chargebacks.

53. Also in February 2014, the Processor Defendants obtained yet another merchant account from a different acquiring bank, but in the name of iSourceUSA. They used this account to process payments related to telemarketing transactions between consumers and the Provider Defendants until July 2015, when the bank terminated the account, yet again due to excessive chargebacks.

The Processor Defendants Provided Substantial Assistance to the Provider Defendants, Despite Evidence of Deceptive Telemarketing Practices

54. The Processor Defendants provided the Provider Defendants access to merchant accounts, ultimately providing critical access to the payment card networks through which they charged consumers millions of dollars for unnecessary technical support services.

55. The Processor Defendants established and maintained U.S. bank accounts in the names of iSourceUSA and Spanning Source and to which Saab, C. Patel, and/or N. Patel were authorized signors. These accounts were used to receive the proceeds from the sale of the technical support services and to distribute those proceeds among the Defendants.

56. The Processor Defendants handled consumer chargebacks, complaints, and refund requests related to the marketing and sale of the technical support services, both personally by Defendants Saab, C. Patel, and N. Patel and through at least four refund clerks who they hired to help deal with the mounting number of such matters.

57. Throughout the relevant period, the Processor Defendants continued to provide payment processing services to the Provider Defendants, despite numerous indicia of fraudulent and deceptive telemarketing practices. For example, the Processor Defendants reviewed and responded to numerous chargeback requests initiated by consumers through their credit card issuers. During this process, they also received chargeback notifications from and exchanged correspondence with bank representatives. Eventually, the Processor Defendants received letters

stating the termination of their merchant account due to excessive chargebacks, yet they continued to obtain new merchant accounts to process consumers' payments for the technical support services.

58. Further, the Processor Defendants reviewed and responded to a number of complaints and refund requests coming directly from consumers. They also reviewed and responded to hundreds of consumer complaints and refund requests sent through the Better Business Bureau ("BBB"). Moreover, they received notices and inquiries from law enforcement agencies, including several attorneys general offices. These chargeback requests and notifications, consumer complaints and refund requests, and law enforcement notices and inquiries describe the Provider Defendants' deceptive telemarketing practices related to their technical support services. Despite this evidence, the Processor Defendants continued to use their merchant accounts to process credit and/or debit card sales for transactions between the Provider Defendants and consumers.

The Role of Bruce Bartolotta

59. Bartolotta is an owner, officer, and registered agent of C4S-CT, an owner and the chief financial officer, secretary, director, and registered agent of Innovazion US, and an owner of iSourceUSA through Innovazion US. He is deeply involved in Defendants' finances. For example, he opened at least seven U.S. bank accounts for Innovazion US and Innovazion India. He has access to at least one Innovazion US bank account used by Innovazion US, Innovazion India, iSourceUSA, and Spanning Source to deposit revenues from the sale of Defendants' technical support services, pay business vendors used by Defendants, and to transfer money overseas to India. He has used his personal credit cards to pay business vendors used by Defendants. He has applied for and secured at least one merchant account for Innovazion US

and has helped Spanning Source secure another merchant account. Further, either personally or through employees, he manages and pays for the telephone services used by Defendants to solicit and contact consumers, including the telephone numbers listed on www.click4support.net, www.click4support.com, and www.c4sts.com.

60. Bartolotta is knowledgeable of and involved in Defendants' business operations. As C4S-CT's vice president of marketing, he receives all consumer complaints filed against the company through the BBB, and he forwards them to Spanning Source. Throughout the complaint process, he remains the company's main contact with the BBB and receives all related correspondence, including communications from consumers. His company, Innovazion US, registers, pays for, and manages the business websites, which the Corporate Defendants use or have used, including www.click4support.net, www.click4support.com, www.c4sts.com, www.ubertechsupport.com, www.c4s.us, and www.tekdex.com.

The Role of George Saab

61. Saab is an owner and officer of iSourceUSA and Spanning Source. Along with C. Patel and N. Patel, Saab is closely involved in Defendants' finances. He is an authorized account signer for multiple Spanning Source bank accounts, at times signing his name as the company's "Founding Partner," "Managing Member/Partner," and president. He is also an authorized account signer for multiple iSourceUSA bank accounts, at times signing his name as a "Managing Member/Partner." Either on his own or with others, Saab has applied for and obtained merchant accounts used to process consumers' credit and/or debit card payments for Defendants' technical support services.

62. Saab is knowledgeable of and involved in Defendants' operations. He is a "Customer Service Manager" for C4S-CT and is a manager for iSourceUSA and Spanning

Source. In these roles, he receives and reviews consumer complaints forwarded by the BBB. In a number of instances, he has personally communicated with individual consumers by telephone and email about their complaints. Once a complaint is resolved, he notifies the BBB to close the complaint. Saab, along with Spanning Source, N. Patel, and C. Patel, hired at least four technical support providers, who dealt with consumers and worked from the Defendants' office in Bensalem, Pennsylvania (the "Bensalem Office"). Further, Saab is the account manager for the virtual office used by iSourceUSA and Spanning Source. He receives the rental invoices, which are in his name.

63. By agreement among the Defendants, Saab, along with Spanning Source, N. Patel, and C. Patel, handled consumer refunds and hired at least four employees (the "refund clerks") to help address refund requests related to Defendants' technical support services. These refund clerks worked in the Bensalem Office. Saab also had the authority to approve consumer refunds and, in some instances, responded directly to consumers' refund requests. Further, Saab knew about and handled consumer chargebacks relating to Defendants' technical support services and was involved in formulating Defendants' "chargeback reduction and business process improvement plan."

The Role of Chetan Bhikhubhai Patel

64. C. Patel is an owner and officer of iSourceUSA and Spanning Source. Like Saab and N. Patel, C. Patel is significantly involved in Defendants' finances. He is an authorized account signer for multiple Spanning Source and iSourceUSA bank accounts, at times signing his name as a "Managing Member/Partner." He has also applied for and obtained at least one merchant account used to process consumers' credit and/or debit card payments for Defendants' technical support services.

65. C. Patel is also knowledgeable of and involved in the Defendants' business operations. For example, he has registered the business website www.click4support.com. He had principal responsibility for the on-site management of the Bensalem Office, where he acted as an "HR manager" and supervised the refund clerks who handled consumers' refund requests generated by the sale of Defendants' technical support services. Also in the Bensalem Office, he received and kept numerous consumer complaints forwarded by the BBB, consumer complaints and notices from state attorneys general offices and other law enforcement agencies, and chargeback notifications from banks. In this capacity, he gained first-hand knowledge of the high number of consumer complaints and chargebacks the Defendants generated. Further, he entered into a lease of the virtual office in Newtown, Pennsylvania that Spanning Source and iSourceUSA currently use.

The Role of Niraj Patel

66. N. Patel is an owner and officer of iSourceUSA and Spanning Source. Like Saab and C. Patel, N. Patel is deeply involved in Defendants' finances. He is an authorized account signer for multiple Spanning Source bank accounts, at times signing his name as the company's "Managing Member/Partner," president, and vice president. He is also an authorized account signer for multiple iSourceUSA bank accounts, at times signing his name as a "Managing Member/Partner." Further, he pays for the Newtown, Pennsylvania virtual office that Spanning Source and iSourceUSA use.

67. N. Patel is also knowledgeable of and involved in Defendants' operations. He assisted Saab in obtaining merchant accounts to process payments related to Defendants' technical support services. Since at least July 2012, he knew about the chargebacks generated by these transactions. He was involved in the hiring of the refund clerks, who worked in the

Bensalem Office, which he used occasionally. He was also involved in or at least knew about the hiring of the technical support providers, who also worked in the Bensalem Office. Further, as noted above, he participated in formulating or at least knew about Defendants' "chargeback reduction and business process improvement plan."

The Role of Abhishek Gagneja

68. A. Gagneja is an owner of C4S-CT, an owner and the president and CEO of Innovazion US, an owner and the CEO of Innovazion India, and an owner of iSourceUSA through Innovazion US. He is intimately involved in Defendants' finances. He has access to at least one Innovazion US bank account used by Innovazion US, Innovazion India, iSourceUSA, and Spanning Source to deposit revenues from the sale of Defendants' technical support services, pay business vendors used by Defendants, and to transfer money overseas to India. He has instructed and/or assisted one or more of the Individual Defendants to obtain merchant accounts to process credit and/or debit card payments related to the technical support services.

69. A. Gagneja is also knowledgeable of and involved in Defendants' operations. Either personally or through Innovazion US, he has registered, paid for, and managed the business websites that Defendants use or have used, including www.click4support.net, www.click4support.com, www.c4sts.com, www.ubertechsupport.com, www.c4s.us, and www.tekdex.com. Either personally or through Innovazion US and/or Innovazion India, he hired, trained, monitored, and compensated the telemarketers, including sales personnel and technical support personnel, that Defendants use or have used to market or sell the technical support services. He provided the sales training modules, scripts, and quality control procedures to the telemarketers. Moreover, he analyzed consumer complaints, refund requests, and

chargebacks generated by Defendants' operations. As noted above, he participated in formulating Defendants' "chargeback reduction and business process improvement plan."

The Role of Rishi Gagneja

70. R. Gagneja is an officer of Innovazion US and Innovazion India. In these capacities, R. Gagneja is knowledgeable of, has the authority to control, and/or participated in Defendants' operations and business practices.

VIOLATIONS OF SECTION 5 OF THE FTC ACT

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

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

COUNT I
Deceptive Misrepresentations
(by Plaintiff Federal Trade Commission)

73. In numerous instances, in the course of marketing, offering for sale, and selling computer security or technical support services, Defendants represent or have represented, expressly or by implication, through a variety of means, including telephone calls and internet communications, that they are part of or affiliated with well-known U.S. technology companies, such as Microsoft, Google, Apple, or Dell.

74. In truth and in fact, Defendants are not part of or affiliated with these U.S. technology companies.

75. Therefore, Defendants' representations set forth in Paragraph 73 are false or misleading and thus constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT II
Deceptive Misrepresentations
(by Plaintiff Federal Trade Commission)

76. In numerous instances, in the course of marketing, offering for sale, and selling computer security or technical support services, Defendants represent or have represented, expressly or by implication, through a variety of means, including telephone calls and internet communications, that they have detected security or performance issues on consumers' computers, including viruses, spyware, malware, or the presence of hackers.

77. In truth and in fact, in numerous instances in which Defendants have made the representations set forth in Paragraph 76, Defendants have not detected security or performance issues on consumers' computers.

78. Therefore, Defendants' representations set forth in Paragraph 76 are false, misleading, or were not substantiated at the time they were made and thus constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

VIOLATIONS OF THE TELEMARKETING SALES RULE

79. Congress directed the FTC to prescribe rules prohibiting abusive and deceptive telemarketing acts or practices pursuant to the Telemarketing Act, 15 U.S.C.§§ 6101-6108, in 1994. The FTC adopted the original Telemarketing Sales Rule ("TSR") in 1995, extensively amended it in 2003, and amended certain provisions thereafter.

80. The Provider Defendants are "sellers" or "telemarketers" engaged in "telemarketing" as defined by the TSR, 16 C.F.R. § 310.2(aa), (cc), and (dd).

81. The Processor Defendants are "merchants" as defined by the TSR, 16 C.F.R. § 310.2(s).

82. The TSR prohibits any seller or telemarketer from making a false or misleading statement to induce any person to pay for goods or services. 16 C.F.R. § 310.3(a)(4).

83. Except as expressly permitted by the applicable credit card system, the TSR makes it a deceptive telemarketing act or practice for:

a. A merchant to present to or deposit into, or cause another to present to or deposit into the credit card system for payment, a credit card sales draft generated by a telemarketing transaction that is not the result of a telemarketing credit card transaction between the cardholder and the merchant;

b. Any person to employ, solicit, or otherwise cause a merchant, or an employee, representative, or agent of the merchant, to present to or deposit into the credit card systems for payment, a credit card sales draft generated by a telemarketing transaction that is not the result of a telemarketing credit card transaction between the cardholder and the merchant; or

c. Any person to obtain access to the credit card system through the use of a business relationship or an affiliation with a merchant, when such access is not authorized by the merchant agreement or the applicable credit card system.

16 C.F.R. § 310.3(c).

84. The TSR also prohibits a person from providing substantial assistance or support to any seller or telemarketer when that person "knows or consciously avoids knowing" that the seller or telemarketer is engaging in any act or practice that violates Section 310.3(a), (c), or (d) or Section 310.4 of the TSR. 16 C.F.R. § 310.3(b).

85. Pursuant to Section 3(c) of the Telemarketing Act, 15 U.S.C. § 6102(c), and Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of the TSR constitutes an

unfair or deceptive act or practice in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT III
Deceptive Telemarketing Calls in Violation of the TSR
(by All Plaintiffs)

86. In numerous instances, in the course of telemarketing their goods and services, Defendants have made false or misleading statements, directly or by implication, to induce consumers to pay for goods or services, including, but not limited to, misrepresentations that Defendants are part of or affiliated with well-known U.S. technology companies, such as Microsoft, Google, Apple, or Dell.

87. Defendants' acts or practices, as described in Paragraph 86, are deceptive telemarketing acts or practices that violate the TSR, 16 C.F.R. § 310.3(a)(4).

COUNT IV
Deceptive Telemarketing Calls in Violation of the TSR
(by All Plaintiffs)

88. In numerous instances, in the course of telemarketing their goods and services, Defendants have made false or misleading statements, directly or by implication, to induce consumers to pay for goods or services, including, but not limited to, misrepresentations that Defendants have detected security or performance issues on consumers' computers, including viruses, spyware, malware, or the presence of hackers.

89. Defendants' acts or practices, as described in Paragraph 88, are deceptive telemarketing acts or practices that violate the TSR, 16 C.F.R. § 310.3(a)(4).

COUNT V
Credit Card Laundering in Violation of the TSR
(by All Plaintiffs)
(Against Defendants iSourceUSA, C4S-CT, Innovazion US, Innovazion India, Bartolotta, A. Gagneja, and R. Gagneja)

90. In numerous instances and without the express permission of the applicable credit card system, Defendants iSourceUSA, C4S-CT, Innovazion US, Innovazion India, Bartolotta, A. Gagneja, and R. Gagneja have:

a. Presented to or deposited into, or caused another to present to or deposit into the credit card system for payment, a credit card sales draft generated by a telemarketing transaction that is not the result of a telemarketing credit card transaction between the cardholder and the merchant;

b. Employed, solicited, or otherwise caused a merchant, or an employee, representative, or agent of the merchant, to present to or deposit into the credit card systems for payment, a credit card sales draft generated by a telemarketing transaction that is not the result of a telemarketing credit card transaction between the cardholder and the merchant; or

c. Obtained access to the credit card system through the use of a business relationship or an affiliation with a merchant, when such access is not authorized by the merchant agreement or the applicable credit card system.

91. Therefore, these Defendants' acts or practices, as described in Paragraph 90, are deceptive telemarketing acts or practices that violate Section 310.3(c) of the TSR, 16 C.F.R. § 310.3(c).

COUNT VI
Assisting and Facilitating Violations of the TSR
(by All Plaintiffs)

92. The Processor Defendants provided substantial assistance or support to the Provider Defendants, when the Processor Defendants knew, or consciously avoided knowing, that the Provider Defendants were engaged in acts or practices that violate Section 310.3(a) of the TSR, as described in Paragraphs 54 through 58 above.

93. The Processor Defendants' acts or practices, as described in Paragraph 92, are deceptive telemarketing acts or practices that violate the TSR, 16 C.F.R. § 310.3(b).

VIOLATIONS OF THE
CONNECTICUT UNFAIR TRADE PRACTICES ACT

94. CUTPA states at § 42-110b(a) that "[n]o person shall engage in unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce."

95. CUTPA states at § 42-110a(4) that "trade" and "commerce" shall mean the "advertising, the sale or rent or lease, the offering for sale or rent or lease, or the distribution of any services or any property, tangible or intangible, real, personal or mixed, and any other article, commodity, or thing of value in this state."

96. CUTPA also states at § 42-110b(b) that "[i]t is the intent that in construing subsection (a) of this section, the commissioner and the courts of this state shall be guided by interpretations given by the Federal Trade Commission and the federal courts to Section 5(a)(1) of the Federal Trade Commission Act (15 U.S.C. 45(a)(1)), as from time to time amended."

97. At all times material to this Amended Complaint, Defendants have engaged in trade and commerce in the State of Connecticut, as "trade" and "commerce" are defined in § 42-110a(4) of CUTPA.

COUNT VII
Deceptive Representation that Defendants Were
Part of or Affiliated with Well-Known U.S. Technology Companies
(By Plaintiff State of Connecticut)

98. In numerous instances, in the course of advertising, marketing, promotion, offering for sale, and selling computer security or technical support services, Defendants have represented, directly or indirectly, expressly or by implication, as set forth in Paragraphs 12 through 70, that they are part of or affiliated with well-known U.S. companies, including but not limited to Microsoft, Google, Apple, or Dell.

99. In truth and in fact, the Defendants are not part of or affiliated with these U.S. technology companies.

100. Defendants' acts and practices, as described herein, are likely to mislead consumers acting reasonably under the circumstances into believing that the Defendants are part of or affiliated with these U.S. technology companies.

101. Defendants' representations as set forth in Paragraph 98 of this Count are material to consumers' decisions whether to purchase the services offered by the Defendants.

102. Defendants have therefore engaged in unfair or deceptive acts and practices in violation of Conn. Gen. Stat. § 42-110b(a).

COUNT VIII
***Per Se* Deceptive Representation of Affiliation**
(By Plaintiff State of Connecticut)

103. The allegations of Paragraphs 98 through 102 of Count VII are incorporated by reference as Paragraph 103 of Count VIII as if fully set forth herein.

104. Defendants' acts and practices violate § 42-110b-18(d) of the Regulations of Connecticut State Agencies and constitute *per se* violations of CUTPA because Defendants have misrepresented that they are part of or affiliated with U.S. technology companies.

105. Defendants have therefore engaged in unfair or deceptive acts and practices in violation of Conn. Gen. Stat. § 42-110b(a).

VIOLATIONS OF THE PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION ACT

106. Section 201-2(3) of the Pa UTPCPL defines "trade" and "commerce" to mean the "advertising, offering for sale, sale or distribution of any services and any property, tangible or intangible, real, person or mixed, and any other article, commodity, or thing of value wherever situate, and includes trade or commerce directly or indirectly affecting the people of this Commonwealth."

107. Defendants have engaged in trade and commerce in the Commonwealth of Pennsylvania by marketing, offering for sale, and selling computer security or technical support services directly to consumers of the Commonwealth.

108. Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce as defined by subclauses (i) through (xxi) of Section 201-2(4) of the Pa UTPCPL are declared unlawful, and whenever the Attorney General has reason to believe that any person is using or is about to use any method, act, or practice declared unlawful, Section 201-4 of the Pa UTPCPL authorizes the Attorney General to bring an action against such person to restrain these methods, acts, or practices.

109. The acts and practices described below constitute unfair methods of competition or unfair or deceptive acts or practices, as prohibited by Section 201-3 of the Pa UTPCPL as defined by subclauses (i), (ii), (iii), (v), (xv), and (xxi) of Section 201-2(4) as follows:

a. Passing off goods or services as those of another, 73 Pa. Cons. Stat. § 201-2(4)(i);

b. Causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods or services, 73 Pa. Cons. Stat. § 201-2(4)(ii);

c. Causing likelihood of confusion or of misunderstanding as to affiliation, connection or association with, or certification by, another, 73 Pa. Cons. Stat. § 201-2(4)(iii);

d. Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities that they do not have or that a person has sponsorship, approval, status, affiliation or connection that he does not have, 73 Pa. Cons. Stat. § 201-2(4)(v);

e. Knowingly misrepresenting that services, replacements or repairs are needed if they are not needed, 73 Pa. Cons. Stat. § 201-2(4)(xv); and

f. Engaging in any other fraudulent or deceptive conduct which creates a likelihood of confusion or of misunderstanding, 73 Pa. Cons. Stat. § 201-2(4)(xxi).

COUNT IX
Deceptive Representation that Defendants Were
Part of or Affiliated with Well-Known U.S. Technology Companies
(By Plaintiff Commonwealth of Pennsylvania)

110. In numerous instances, in the course of advertising, marketing, promotion, offering for sale, and selling computer security or technical support services, Defendants have represented, directly or indirectly, expressly or by implication, as set forth in Paragraphs 12 through 70, that they are part of or affiliated with well-known U.S. companies, including but not limited to Microsoft, Google, Apple, or Dell.

111. In truth and in fact, the Defendants are not part of or affiliated with these U.S. technology companies.

112. Defendants' acts and practices, as described herein, are likely to confuse or mislead consumers acting reasonably under the circumstances into believing that the Defendants are part of or affiliated with these U.S. technology companies.

113. Defendants have therefore engaged in unfair or deceptive acts and practices in violation of 73 Pa. Cons. Stat. § 201-2(4)(i), (ii), (iii), (v), and (xxi).

COUNT X
Deceptive Representation of Needed Repairs or Services
(By Plaintiff Commonwealth of Pennsylvania)

114. In numerous instances, in the course of marketing, offering for sale, and selling computer security or technical support services, Defendants represent or have represented, expressly or by implication, through a variety of means, including telephone calls and internet communications, as set forth in Paragraphs 35 through 43, that they have detected security or performance issues on consumers' computers, including viruses, spyware, malware, or the presence of hackers.

115. In truth and in fact, in numerous instances in which Defendants have made the representations set forth in Paragraph 114, Defendants have not detected security or performance issues on consumers' computers.

116. Defendants scare consumers into purchasing unneeded technical support services.

117. Therefore, Defendants' representations are confusing, misleading, or were not substantiated at the time they were made and thus constitute unfair or deceptive acts and practices in violation of 73 Pa. Cons. Stat. § 201-2(4)(xv) and (xxi).

COUNT XI
Deceptive or Abusive Telemarketing Acts or Practices
(By Plaintiff Commonwealth of Pennsylvania)

118. The allegations of Paragraphs 79 through 93 are incorporated by reference as Paragraph 118 of Count XI as if fully set forth herein.

119. Pennsylvania's Telemarketer Registration Act ("Pa TRA"), 73 Pa. Cons. Stat. Ann. § 2241, *et seq.*, prohibits "sellers" or "telemarketers" engaged in telemarketing, from engaging in any deceptive or abusive telemarketing acts or practices in violation of the Telemarketing Sales Rule, 16 C.F.R Part 310. 73 Pa. Cons. Stat. Ann. § 2245(a)(9).

120. A violation of the Pa TRA is a violation of the Pa UTPCPL. 73 Pa. Cons. Stat. Ann. § 2246.

121. Defendants' acts or practices, as described in Paragraphs 86, 88, 90 (as to Defendants iSourceUSA, C4S-CT, Innovazion US, Innovazion India, Bartolotta, A. Gagneja, and R. Gagneja only), and 92, are deceptive or abusive telemarketing acts or practices that violate Sections 310.3(a)(4), (b), and (c) of the Telemarketing Sales Rule; therefore, Defendants are engaged in deceptive or abusive telemarketing acts or practices in violation of the Pa TRA, thereby violating sub-clause (xxi) of the Pa UTPCPL. 73 Pa. Cons. Stat. Ann. § 201-2(4)(xxi).

CONSUMER INJURY

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

THIS COURT'S POWER TO GRANT RELIEF

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

124. Section 19 of the FTC Act, 15 U.S.C. § 57b, and Section 6(b) of the Telemarketing Act, 15 U.S.C. § 6105(b), authorize this Court to grant such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the TSR, including the rescission or reformation of contracts and the refund of money.

125. Pursuant to 28 U.S.C. § 1367, the Court has supplemental jurisdiction over Plaintiff State of Connecticut's claims based on CUTPA, and the Court may award relief under CUTPA, §§ 42-110m(a) and 42-110o(b).

126. Pursuant to 28 U.S.C. § 1367, this Court has supplemental jurisdiction over Plaintiff Commonwealth of Pennsylvania's claims based on Pa UTPCPL, and the Court may award relief under Pa UTPCPL pursuant to 73 Pa. Cons. Stat. §§ 201-4, 201-4.1, 201-8, and 201-9.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. § 53(b) and 57b, the TSR, Conn. Gen. Stat. §§ 42-110a *et. seq.*, 73 Pa. Cons. Stat. § 201-1, *et seq.*, and the Court's own equitable powers, requests that the Court:

A. Award Plaintiffs such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including, but not limited to, temporary and preliminary injunctions, an order providing for immediate access, the turnover of business records, an asset freeze, the appointment of a receiver, and the disruption of domain and telephone services;

B. Enter a permanent injunction to prevent future violations of the FTC Act, TSR, CUTPA, and Pa UTPCPL by Defendants;

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

D. Award Plaintiff FTC the costs of bringing this action, Plaintiff State of Connecticut, Office of Attorney General, its attorneys' fees and costs in bringing this action, and Plaintiff Commonwealth of Pennsylvania, Office of Attorney General, the costs incurred in pursuing this enforcement action, as well as such other and additional relief as the Court may determine to be just and proper.

Respectfully Submitted,

DAVID C. SHONKA
Acting General Counsel

JON MILLER STEIGER
Regional Director
East Central Region

Dated: May 11, 2016

/s/ Fil M. de Banate

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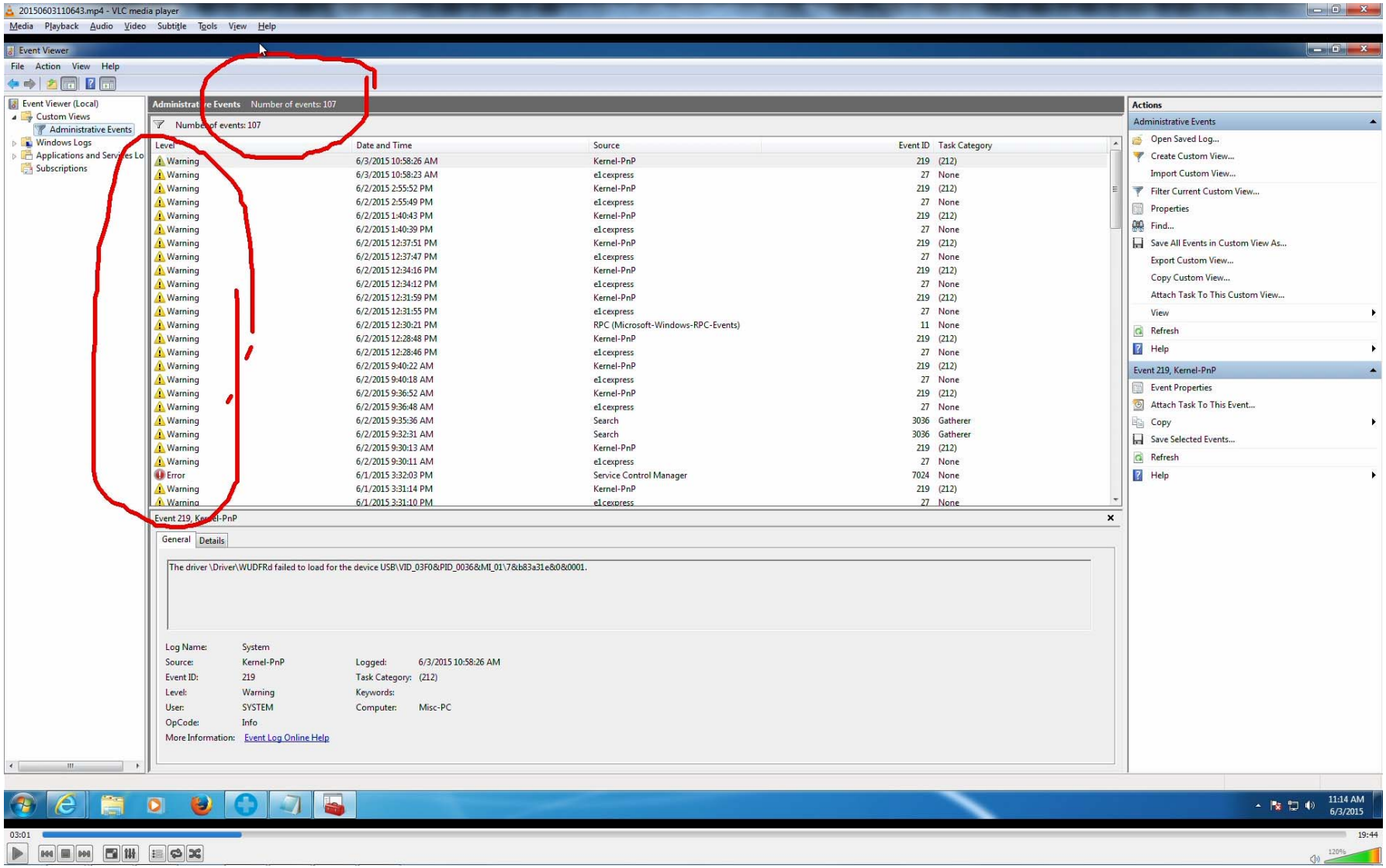
ATTACHMENT A



ATTACHMENT B

20150603110643.mp4 - VLC media player

Media Playback Audio Video Subtitle Tools View Help

Event Viewer

File Action View Help

Event Viewer (Local)
- Custom Views
  - Administrative Events
- Windows Logs
- Applications and Services Logs
- Subscriptions

Administrative Events Number of events: 107

Number of events: 107

Level	Date and Time	Source	Event ID	Task Category
Warning	6/1/2015 3:00:25 PM	e1cexpress	27	None
Warning	6/1/2015 12:34:34 PM	e1cexpress	27	None
Warning	6/1/2015 10:18:18 AM	Search		
Warning	6/1/2015 10:15:59 AM	e1cexpress		
Warning	5/29/2015 5:12:11 PM	e1cexpress		
Warning	5/29/2015 8:32:24 AM	e1cexpress		
Warning	5/28/2015 3:47:50 PM	e1cexpress		
Warning	5/28/2015 8:52:11 AM	e1cexpress		
Warning	5/27/2015 1:06:14 PM	e1cexpress		
Warning	5/27/2015 12:48:24 PM	Search		
Warning	5/27/2015 12:45:48 PM	e1cexpress		
Warning	5/26/2015 9:23:06 PM	e1cexpress		
Warning	5/26/2015 8:59:37 PM	e1cexpress		
Warning	5/26/2015 8:54:37 PM	ASP.NET 4.0.30319		
Warning	5/26/2015 8:54:30 PM	ASP.NET 4.0.30319		
Warning	5/26/2015 8:50:15 PM	RestartManager		
Warning	5/26/2015 8:50:15 PM	RestartManager		
Warning	5/26/2015 8:36:19 PM	ASP.NET 4.0.30319		
Warning	5/26/2015 8:36:11 PM	ASP.NET 4.0.30319		
Warning	5/26/2015 8:26:40 PM	e1cexpress		
Warning	5/26/2015 8:25:20 PM	User Profile Service		
Warning	5/26/2015 7:58:16 PM	Search		
Warning	5/26/2015 7:56:47 PM	e1cexpress		
Warning	5/26/2015 7:55:36 PM	User Profile Service	1530	None
Error	5/26/2015 7:34:44 PM	WindowsUpdateClient	20	Windows Update Agent
Error	5/26/2015 7:33:45 PM	Service Control Manager	7023	None

System Configuration

General | Boot | Services | Startup | Tools

Service	Manufacturer	Status	Date Disabled
Extensible Authentication Protocol	Microsoft Corporation	Stopped	
Encrypting File System (EFS)	Microsoft Corporation	Stopped	
Windows Media Center Receiver...	Microsoft Corporation	Stopped	
Windows Media Center Schedule...	Microsoft Corporation	Stopped	
Fax	Microsoft Corporation	Stopped	
Windows Presentation Foundati...	Microsoft Corporation	Stopped	
Human Interface Device Access	Microsoft Corporation	Stopped	
Health Key and Certificate Mana...	Microsoft Corporation	Stopped	
HomeGroup Listener	Microsoft Corporation	Stopped	
Windows CardSpace	Microsoft Corporation	Stopped	
Internet Explorer ETW Collector ...	Microsoft Corporation	Stopped	
PnP-X IP Bus Enumerator	Microsoft Corporation	Stopped	

Note that some secure Microsoft services may not be disabled.

Enable all | Disable all

Hide all Microsoft services

OK | Cancel | Apply | Help

Event 27, e1cexpress

General | Details

Intel(R) 82579LM Gigabit Network Connection
Network link is disconnected.

Log Name: System
Source: e1cexpress
Logged: 5/27/2015 1:06:14 PM
Event ID: 27
Task Category: None
Level: Warning
Keywords: Classic
User: N/A
Computer: Misc-PC
OpCode:
More Information: Event Log Online Help

Actions

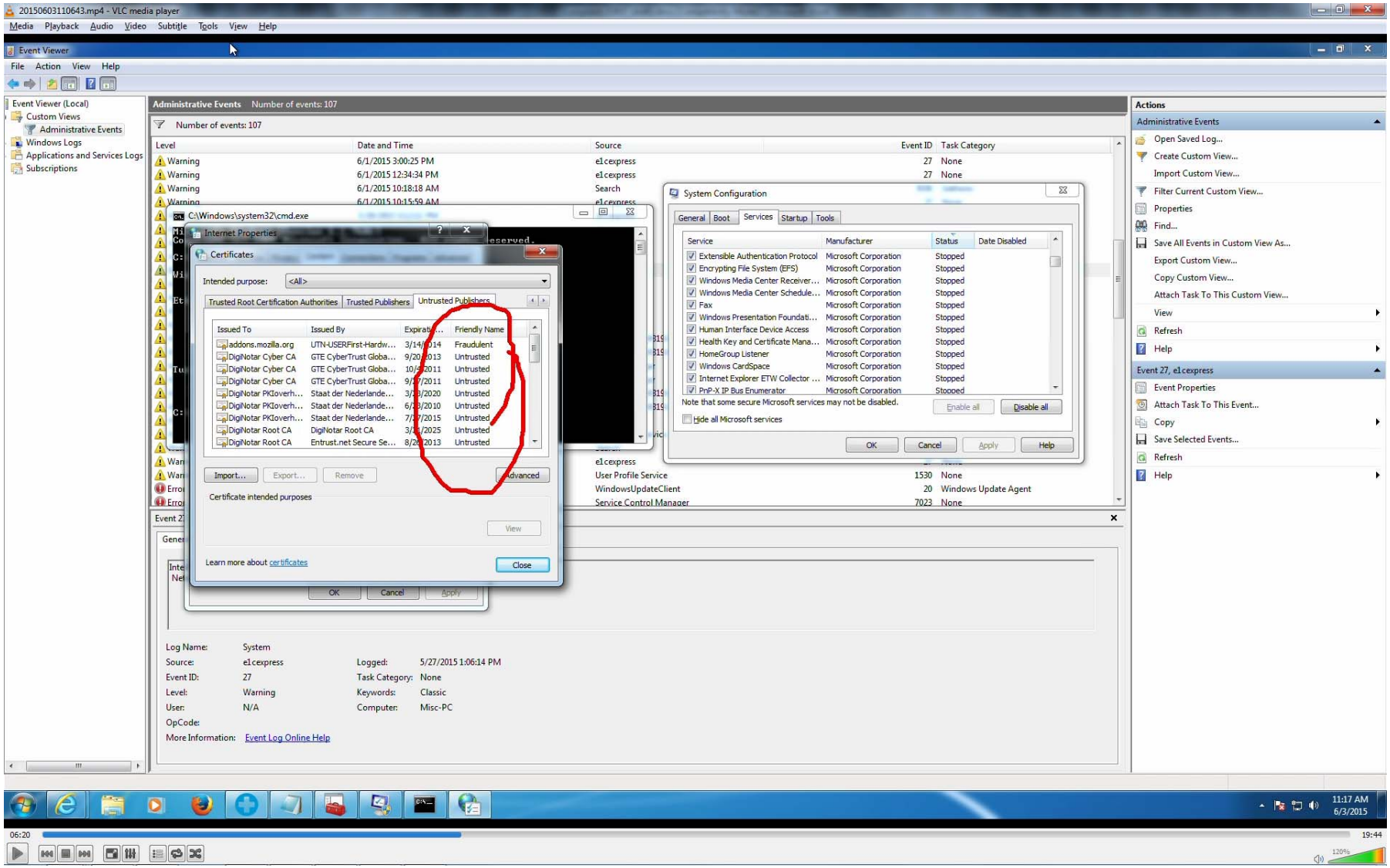
Administrative Events
- Open Saved Log...
- Create Custom View...
- Import Custom View...
- Filter Current Custom View...
- Properties
- Find...
- Save All Events in Custom View As...
- Export Custom View...
- Copy Custom View...
- Attach Task To This Custom View...
- View
- Refresh
- Help

Event 27, e1cexpress
- Event Properties
- Attach Task To This Event...
- Copy
- Save Selected Events...
- Refresh
- Help

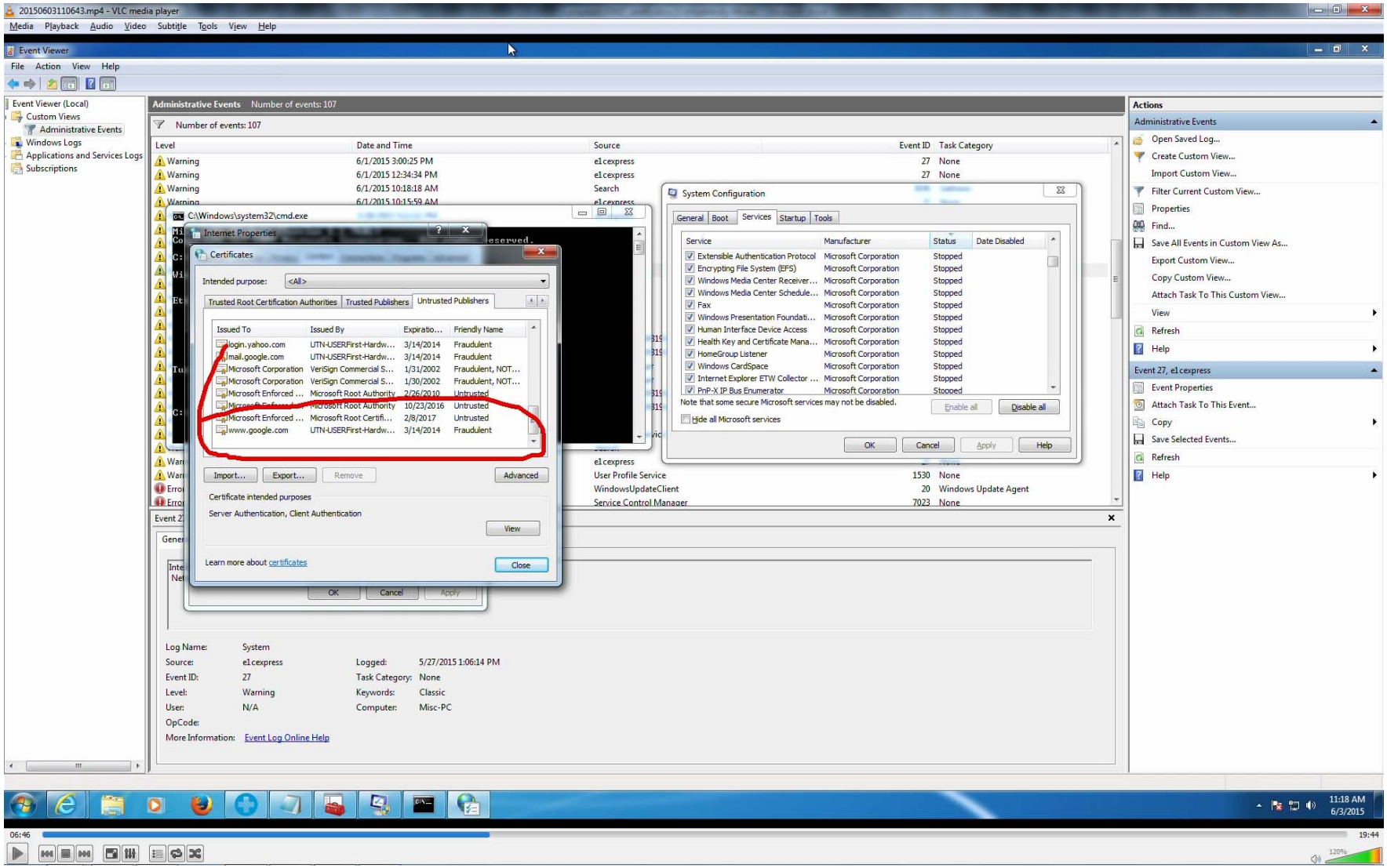
11:16 AM
6/3/2015

05:23 19:44

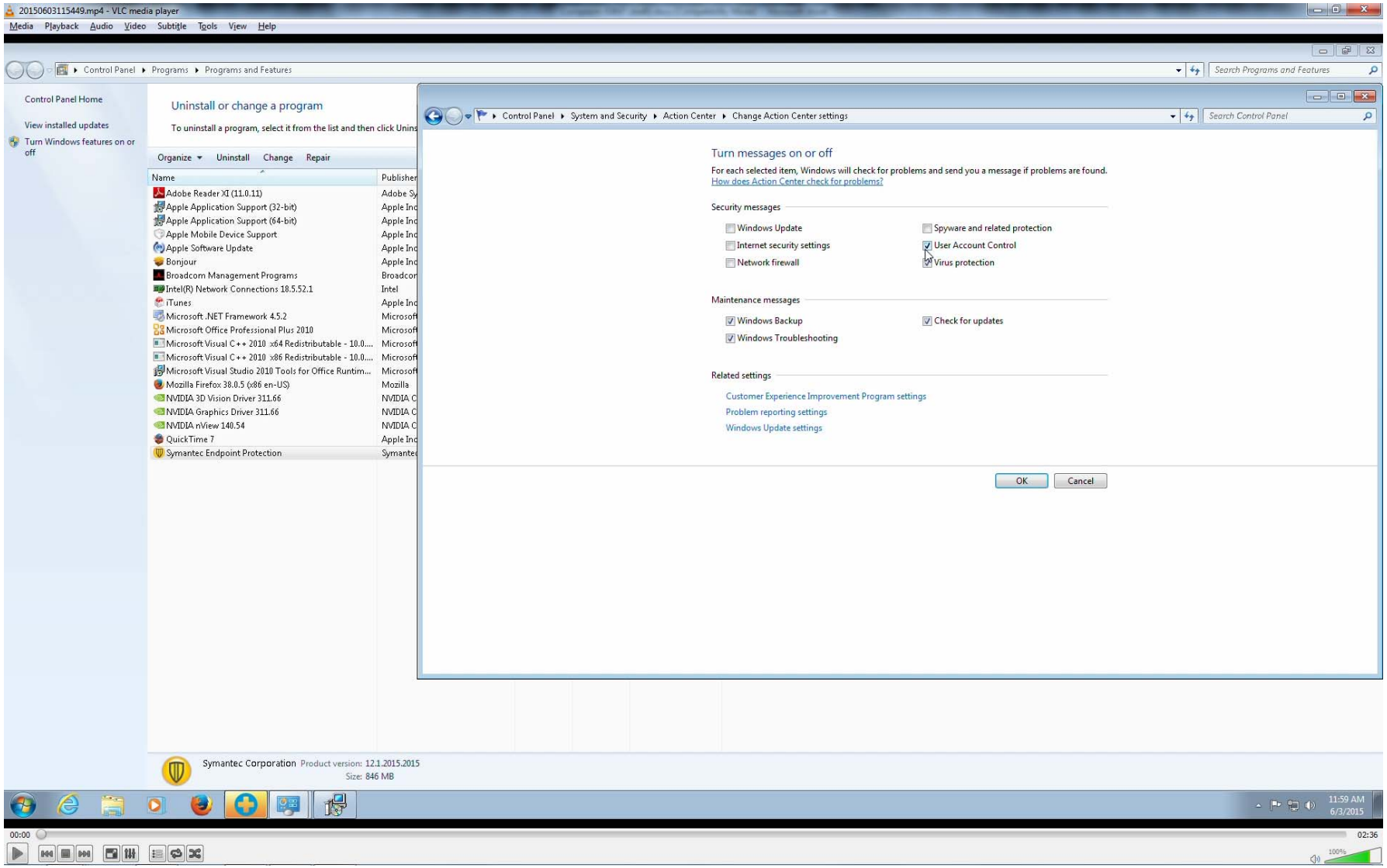
ATTACHMENT C



ATTACHMENT D



ATTACHMENT E



ATTACHMENT F