

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

_____))
In the Matter of))
)) **PUBLIC**
Jerk, LLC, a limited liability company,))
also d/b/a JERK.COM, and)) DOCKET NO. 9361
))
John Fanning,))
individually and as a member of Jerk,))
LLC.))
_____))



**COMPLAINT COUNSEL'S MOTION FOR *IN CAMERA* TREATMENT
OF SENSITIVE PERSONAL AND FINANCIAL INFORMATION**

Pursuant to Commission Rule of Practice 3.45, and the Court's May 28, 2014 Scheduling Order, Complaint Counsel respectfully file this Motion for *In Camera* Treatment of Sensitive Personal and Financial Information.

**MEMORANDUM IN SUPPORT OF COMPLAINT COUNSEL'S
MOTION FOR *IN CAMERA* TREATMENT OF
SENSITIVE PERSONAL AND FINANCIAL INFORMATION**

I. BACKGROUND

From at least 2009 through 2012, Respondents have operated Jerk.com, a website that invited people to create profiles about others and rate the profiled person a “Jerk” or “not a Jerk.” The website had as many as 85 million unique pages profiling individuals. (See CX0151-012; CX0153-002)¹ According to Complaint Counsel’s evidence, approximately 29 million of those profiles contained a photo of the profiled subject, an estimated 4.75 million of which were photos of children who appeared to be under age 10. (CX0063-002 ¶ 9, ¶ 10) Numerous photos showed consumers in personal moments with their families, including children in bathtubs and a mother nursing her newborn. (See CX0259-024–030) Some profiles also displayed individually identifying information about the profiled person, such as address, email address, or phone number. (See CX0048; CX0259)

On April 7, 2014, the Commission issued a Complaint alleging that Respondents violated Section 5(a) of the Federal Trade Commission Act by falsely representing that the content on Jerk.com was created by Jerk.com users and reflected those users’ views of the individuals profiled on the site (Count I), and that by purchasing a membership to Jerk.com, users would obtain additional paid features (Count II). Fact discovery opened on May 28 and closed on November 17. The evidentiary hearing (or “trial”) is set for January 27, 2015. In preparation for

¹ Complaint Counsel provided an unredacted copy of all the exhibits cited in this brief as part of their Final Proposed Exhibit List submitted to the Court and to Respondents on December 12, 2014.

that hearing, Complaint Counsel respectfully move the Court to grant permanent *in camera* treatment to the sensitive personal and financial information described below.

II. LEGAL STANDARD

Under Commission Rule of Practice (“Rule”) 3.45(b), the Court shall order that material be accorded permanent *in camera* treatment if the material constitutes “sensitive personal information.” 16 C.F.R. § 3.45(b). “Sensitive personal information” includes, but is not limited to, “an individual’s Social Security number, taxpayer identification number, financial account number, credit card or debit card number, driver’s license number, state issued identification number, passport number, date of birth (other than year), and any sensitive health information identifiable by individual, such as an individual’s medical records.” *Id.* In addition to the listed categories of information, this Court has previously found individuals’ names and addresses, among other information, to constitute sensitive personal information. *See, e.g., In re LabMD, Inc.*, No. 9357, 2014 WL 2331029, at *1, (FTC May 6, 2014); *In re ProMedica Health Sys.*, No. 9346, 2011 WL 1896771, at *1 (FTC May 25, 2011).² In addition to protecting sensitive personal information, this Court may “make any other order which justice requires to protect a party or other person from annoyance, embarrassment, oppression, or undue burden or expense.” 16 C.F.R. § 3.31(d).

² Federal courts also require litigants to redact personal data identifiers from public filings. *See, e.g.,* Fed. R. Civ. P. 5.2(a); C.D. Cal. R. R. 5.2-1.

III. ARGUMENT

A. The Court Should Protect Consumers' Sensitive Personal Information.

Complaint Counsel seek permanent *in camera* treatment for the following categories of sensitive personal information of consumers who have complained about Jerk.com or whose Jerk.com profiles were captured by FTC staff as part of this investigation: (1) names, (2) photographs, (3) telephone numbers, (4) addresses, (5) e-mail addresses, and (6) online usernames.³ The Commission has granted *in camera* protection to such information in other cases. *See, e.g., In re LabMD, Inc.*, No. 9357, 2014 WL 2331029, at *1 (F.T.C. May 6, 2014) (accorded permanent *in camera* treatment to, *inter alia*, individuals' names, addresses, dates of birth).

1. Consumer Complaints and Testimony

The first set of documents for which Complaint Counsel seek permanent *in camera* protection consists of consumers' complaints about Jerk.com, including requests to have profiles removed from Jerk.com. As outlined in Attachment A,⁴ these documents include:

- Consumer declarations about experiences with Jerk.com, and corresponding attachments, submitted by consumers as part of this case (CX0001–CX0040);
- Consumer deposition testimony about experiences with Jerk.com, taken as part of this case, and corresponding exhibits (CX447–CX0449, CX0450);

³ Respondents do not oppose permanent *in camera* treatment for “identification numbers, photographs, children’s names/identification, emails, and usernames.” Respondents do oppose permanent *in camera* treatment for “names and addresses of witnesses.” Complaint Counsel, however, view names and addresses of all consumers as critical sensitive personal information warranting protection from exposure, for the reasons explained herein.

⁴ Attachment A is a list of exhibits, and the sensitive personal or financial information contained therein, for which Complaint Counsel seek permanent *in camera* treatment, as well as copies of these exhibits containing Complaint Counsel’s proposed redactions.

- Complaints by consumers about Jerk.com or removal requests to law enforcement authorities (CX0550–CX0563, CX565–CX0608, CX0610–CX0620, CX0622–CX0624, CX0626–CX0627); to Jerk.com’s server provider (CX0403), to Jerk, LLC’s attorney (CX0529–CX0545, CX0745–CX0762, CX0764–CX0765, CX0775–CX0776), and to Jerk, LLC’s registered agent (CX0042);
- Police incident report about a minor who was profiled on Jerk.com (CX0044);⁵ and
- Complaint Counsel’s Final Proposed Exhibit List and Final Witness List.⁶

Courts have traditionally accorded strong protection against public disclosure to the identities of voluntary witnesses and informants. *See Forrester v. United States Dep’t of Labor*, 433 F. Supp. 987, 989 (S.D.N.Y. 1977) (recognizing that “public policy requires that individuals may furnish investigative information to the government with complete candor and without the understandable tendency to hedge or withhold information out of fear that their names and the information they provide will later be open to public view”). Similarly, the Commission’s strong interest in protecting the personal information of consumer complainants has been widely recognized by the courts.⁷ Personally identifying information in consumers’ complaints submitted to the FTC, such as the categories listed above, have received protection from disclosure in light of the “substantial privacy interest of protecting victims . . . from abuse, harassment, and embarrassment given the very real risk of their being identified.” *Ayuda, Inc. v.*

⁵ For this exhibit, which describes the harassment of a thirteen-year old profiled on Jerk.com and has been designated by the providing police agency as “Closed to Records,” Complaint Counsel seek permanent *in camera* treatment for the entire document.

⁶ Both Complaint Counsel’s Final Proposed Exhibit List and Final Witness List, submitted on December 12, 2014, contain the names of dozens of consumers.

⁷ *See, e.g., Lakin Law Firm, P.C. v. FTC*, 352 F.3d 1122, 1124 (7th Cir. 2003) (“The personal privacy interests of consumers did not disappear when they complained to the FTC.”); *Carter, Fullerton & Hayes LLC v. FTC*, 520 F. Supp. 2d 134, 144-45 (D.D.C. 2007) (upholding the

FTC, --- F. Supp. 3d ---, 2014 WL 4829574, at *10 (D.D.C. Sept. 30, 2014) (shielding from release under FOIA “personal identifying information in the form of names, addresses, telephone numbers, and email addresses” of complainants in the FTC’s Consumer Sentinel database). As one district court recently explained, “consumers who are victims, and consequently also are whistleblowers and witnesses, face potential backlash if identified in the form of embarrassment, becoming a ‘mark’ for similar schemes in the future, and retribution from the alleged wrongdoer.” *Id.* The court also cautioned that “[i]f an individual is identified through his or her personal information, the release of such information may result in economic and physical danger to the accused, as well as potential embarrassment and harassment.” *Id.*

The consumer complainants here would face these same risks if their identities linked to their complaints are exposed. Many of these consumers complained about Jerk.com precisely because the profiles of them displayed on Jerk.com resulted in harassment, embarrassment, professional injury, and threats to personal safety for them and their children. For example, several consumers complained about the threats posed to their professional reputations by the Jerk.com profiles of them.⁸ One consumer testified about the negative impact to his small business from having been profiled on Jerk.com,⁹ and another reported that the Jerk.com profile

FTC’s decision to withhold from public review the names, addresses, and telephone numbers of consumers who complained to the FTC).

⁸ *See, e.g.*, CX0540 (“The news of this site using my name and image has caused me great deal of stress, embarrassment and concern that it may effect [sic] my ability to obtain employment in the future”); CX0541 (“having my name connected to this site has caused serious professional consequences.”).

⁹ CX450-24:18–23 (“So I felt like up until Jerk.com, I had a really -- you know, my company and myself had a good reputation online. And then once I saw the Jerk.com thing, it really just,

of her came up during two job interviews.¹⁰ Consumers also reported health problems,¹¹ as well as risks to their safety stemming from being profiled.¹² Because an estimated 4.74 million of the profiles contained photos of young children (*see* CX0063-002 ¶ 10),¹³ consumers have also voiced concerns about the safety of their children.¹⁴ One mother reported fears that a past stalker would be able to identify her minor daughter,¹⁵ while another complained that she was “very concerned for my safety and the well-being of my family especially being that of an active duty military member.”¹⁶ Publicly exposing these consumers’ private concerns through this litigation would magnify the very same risks about which they had complained, and would thereby

you know, destroyed that.”); CX0038 ¶ 4 (“I was concerned about my business reputation so I paid jerk.com \$30 for an annual membership.”).

¹⁰ CX0544-001 (“I am trying to find a job closer to home, as I commute an hour back and forth to work and the jerk.com site has come up in two interviews”).

¹¹ *See, e.g.*, CX0615-001 (reporting having to see several psychologists about the Jerk.com posting of him); CX0028-002 ¶ 8 (“[D]iscovering a jerk.com profile associated with it was traumatic and had a negative impact on my health.”); CX0036-001 ¶ 3 (“I was mortified and embarrassed”); CX0536-001 (“I’ve been having sleepless nights since the day I saw his profile in your website and I keep on crying on why there are people who never stop torturing me”).

¹² *See, e.g.*, CX0538 (“my health and safety are in jeopardy”); CX0535-001 (“I was hoping you could help me get a threat to me and my property removed from Jerk.com”); CX0596-001 (“Jerk.com has made a profile for me on their website. . . I feel unsafe and victimized by this website.”); CX0598-001 (“The reason I need my page removed is because my father who is in jail is coming out and I worry about my safety”).

¹³ *See also* CX0048; CX0259 (Jerk.com screen captures); CX0036-001 ¶¶ 3-4 (consumer declaration); CX0617 (consumer complaint).

¹⁴ *See, e.g.* CX0545-001 (“I have been receiving malicious posts from the man who has harmed my young daughter and is threatening me for nearly a year after I reported the abuse”).

¹⁵ CX0627 (“I have dealt with a stalker and do not want him googling my name and getting a pic of her.”)

¹⁶ CX0595-001.

penalize them for complaining to the agency. Moreover, since the Jerk.com profiles at issue are no longer displayed online,¹⁷ the public release of this information would add further damage by prolonging or resurrecting the potential risks to the consumer complainants.

Conversely, protecting the complainants' identities through *in camera* treatment would avert additional harassment, retaliation, or other personal and professional injury, without shielding from public scrutiny the substance of their complaints. Ordering *in camera* treatment for complainants' sensitive personal information is even more appropriate since this information is not relevant to the disposition of this case. *See In re Basic Research, LLC*, No. 9318, 2006 FTC LEXIS 14, at *5-6 (2006) (permitting the redaction of "[i]nformation concerning particular [consumers'] names or other [personal] data" because it "is not relevant" (internal citation and quotation marks omitted)). The complainants' personally identifying information has no bearing on either the Complaint's allegations or Respondents' defenses, and its protection would neither prejudice Respondents nor impede the public's ability to understand the arguments or evidence presented.

2. Screen and Video Captures of Jerk.com

The second set of trial exhibits for which Complaint Counsel seek permanent *in camera* protection of sensitive personal information consists of screen and video captures of consumer profiles displayed on Jerk.com documented by FTC staff between May 2012 and March 2013:

¹⁷ CX0295-023: 18-19 (statement by John Fanning's attorney at the Scheduling Conference: "the Web site has been down for some significant amount of time").

CX0047¹⁸–CX0050, CX0053, CX0064–CX0070, CX0259, CX0260–CX0262, CX0265–CX0271, CX0810.¹⁹

The consumers recorded in these captures neither knew that their profiles—and the sensitive information contained therein—were being documented as part of a law enforcement investigation, nor granted their consent to the captures. These captures took place before the filing of the Complaint; they were not intended for public dissemination. But, since the current online version of Jerk.com no longer displays these profiles (*see* CX0295-023: 18-19), and Respondents have not provided Jerk.com profile screenshots or code for the site in response to discovery requests (*see* CX0297-003 ¶¶ 5, 6; CX0777-002 ¶¶ 5, 6), these captures remain the best reliable means of presenting to the Court what was displayed on Jerk.com.

The risks to these consumers from having their identifiable Jerk.com profiles publicly released is similar to the risk to the consumer complainants described in section III.A.1. In light of the numerous complaints received by the FTC expressing consumers' emotional distress, economic harm, and concerns about safety stemming from having a profile of themselves displayed on Jerk.com, it is reasonable to conclude that at least some of the hundreds of consumers profiled in the FTC's captures would share the same risks and suffer the same harm if their personally identifiable Jerk.com profiles resurfaced because of this action. Additionally, given the large number of profiles captured, it is impracticable for Complaint Counsel to locate

¹⁸ CX0047 is a declaration by FTC staff describing, *inter alia*, screen and video captures of Jerk.com that he documented. The declaration refers to one consumer by name.

¹⁹ For CX0049, CX0050, CX0053, CX0064–CX0070, and CX0260–CX0263, CX0265–CX0270, which contain the profiles of hundreds of consumers and would be unduly burdensome to redact, Complaint Counsel request permanent *in camera* treatment for the exhibits in their entirety.

and interview each of these consumers to determine whether the release of their sensitive information in connection with their past Jerk.com profiles would pose a threat.²⁰

The fact that these captured profiles are no longer publicly accessible further weighs against resurrecting them now, in the context of this case. And, as with the consumer complainants, protecting the sensitive information of the consumers in the captured profiles would not affect the full and fair disposition of this matter.

B. The Court Should Protect Sensitive Personal Financial Information.

Complaint Counsel seek permanent *in camera* treatment for the following categories of sensitive personal financial information: (1) financial account numbers, (2) credit card or debit card numbers, (3) financial transaction numbers, (4) tax identification numbers, (5) dates of birth, and (6) personal signatures.²¹ As listed in Attachment A, the trial exhibits for which Complaint Counsel specifically seek *in camera* treatment for sensitive personal financial information include:

- Records and contracts from Immedion, LLC, Bank of America, N.A., Stripe, Inc., PayPal, Inc., Harvard Business Services, Inc., Intellius Inc., and a Jerk, LLC consultant, (CX0402, CX0411–CX0419, CX0421–CX0425, CX0427–CX0428, CX0494, CX0735,

²⁰ For this reason, Complaint Counsel also seek a limited exemption for these exhibits from Rule 3.45(b)'s requirement to "provide, for each piece of such evidence [for which *in camera* treatment is sought] and affixed to such evidence, the name and address of any person who should be notified in the event the Commission intends to disclose *in camera* information in a final decision." While Complaint Counsel's Attachment B identifies the contact information for persons who would be affected by the disclosure of the sensitive personal information described in Section III.A.1, providing contact information for the hundreds of persons displayed in the FTC's captures of Jerk.com profiles—people with whom Complaint Counsel have had no contact—would be overly burdensome.

²¹ Respondents do not oppose permanent *in camera* treatment for "financial information" and "identification numbers."

CX0770–773), including a tax form for Jerk, LLC (CX0507);²²

- Emails and other documents showing financial account, credit card, or debit card numbers (CX0091, CX0119, CX0238, CX0240, CX0481, CX0738);
- Personal checks (CX0237, CX0241–CX0247); and
- Video captures and credit card statements showing FTC staff purchases (CX0050, CX0051, CX0053, CX0054, CX0262–CX0264).²³

Rule 3.45 identifies dates of birth, financial account, tax identification, and credit card or debit card numbers as sensitive personal information. Financial transaction numbers and personal signatures, while not listed in the Rule, also constitute sensitive personal information because they are individually identifiable pieces of information, the disclosure of which would expose the associated individual to increased, unnecessary risk of identity theft, fraud, and other financial harm. *See, e.g., True the Vote v. Hosemann*, No. 3:14-CV-532-NFA, 2014 WL 4273332, at *25-26 (S.D. Miss. Aug. 29, 2014) (recognizing, in light of growing concerns of identity theft, the threat posed by combining pieces of personal information to obtain “a host of other highly personal information about an individual, particularly in this day of computers with vast searching powers”). Absent this litigation, this information would not ordinarily be released

²² CX0507 is a W-9 Request for Taxpayer Identification Number and Certification form that contains taxpayer identification information for Jerk, LLC. Complaint Counsel seeks redaction of this exhibit in its entirety. CX0422, CX0425 and CX0428 are spreadsheets containing information about hundreds of financial transactions, including the financial account, credit card, and debit card numbers, addresses, and e-mail addresses associated with those transactions. Because of the volume of the sensitive financial and personal information in these exhibits, Complaint Counsel request permanent *in camera* treatment of the exhibits in their entirety.

²³ Complaint Counsel seeks permanent *in camera* treatment for CX0050, CX0051, CX0053, CX0054, CX0262–CX0263 in their entirety because full redaction of the sensitive financial information in those videos would require redaction of that information from each single frame of the video. Given that each video contains thousands of frame, full redaction of the information would be unduly burdensome.

in the public domain. Nor would *in camera* treatment of this information undermine the full and fair resolution of this case. Complaint Counsel therefore requests permanent *in camera* treatment for any sensitive personal financial information disclosed in this matter.

C. A Limited Set of Sensitive Personal Information In The Evidentiary Record Should Be Protected.

In addition to the above requests for *in camera* treatment of sensitive personal and financial information in specific exhibits, Complaint Counsel request permanent *in camera* treatment for the following categories of sensitive personal information contained in any other part of this action's evidentiary record: (1) personal phone numbers, (2) home addresses, (3) personal e-mail addresses, and (4) personal online usernames.²⁴ This sensitive information is contained in numerous places throughout the record, including deposition testimony (*see, e.g.*, CX0744-25: 4-5), declarations (*see, e.g.*, CX464-001 ¶ 4), and documents (*see, e.g.*, CX0192, CX0306, CX0666). Several of the witnesses who have provided this information are witnesses who worked for or invested in Jerk, LLC. (*See* CX0057, CX0089-CX0090, CX0302-CX0303, CX0464-CX0465, CX0629-CX0630) The disclosure of individually identifiable information of persons connected with a target of a government enforcement action could subject these persons to increased, unnecessary risk of harassment and retaliation. *See Fund for Constitutional Gov't v. Nat'l Archives & Records Serv.*, 485 F. Supp. 1, 6 (D.D.C. 1979) (recognizing that "the mere connection of an individual's name with a well-known investigation may be both embarrassing and damaging"); *see also Ayuda*, 2014 WL 4829574, at *10 (describing the threat of "economic

²⁴ As noted *supra* n.3, Respondents do not oppose permanent *in camera* treatment for "identification numbers, photographs, children's names/identification, emails, and usernames," but do oppose permanent *in camera* treatment for "names and addresses of witnesses."

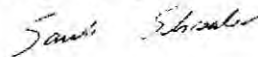
and physical danger . . . as well as potential embarrassment and harassment” posed by releasing personally identifying information of persons “associated with a federal agency’s crime enforcement effort”).

Providing a list at this stage of all exhibits containing this sensitive personal information is infeasible and unnecessary. In light of Jerk, LLC’s recent reemergence in this action, Complaint Counsel cannot predict whether it will come forward with previously undiscovered materials to be introduced into evidence. Nor can Complaint Counsel predict the content of trial testimony. Moreover, the limited categories of information at issue are so clearly recognizable that the parties should face no difficulty in identifying them in any given evidentiary material. Recognizing this Court’s preference against adjudicating piecemeal requests for *in camera* treatment, see *In Re McWane*, No. 9351, Trial Tr. at 2235:6-8 (Sept. 14, 2012), Complaint Counsel request that the Court grant *in camera* treatment to the requested categories of personal sensitive information for any material to be introduced into the evidentiary record in this matter.

IV. CONCLUSION

For the foregoing reasons, Complaint Counsel request that the Court grant this Motion for *In Camera* Treatment.

Respectfully submitted,



Sarah Schroeder
Yan Fang
Boris Yankilovich
Kenneth Abbe

Dated: December 23, 2014

Federal Trade Commission
901 Market Street, Suite 570
San Francisco, CA 94521

PUBLIC

Telephone: (415) 848-5100

Fax: (415) 848-5184

COMPLAINT COUNSEL

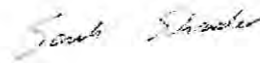
STATEMENT CONCERNING MEET AND CONFER

The undersigned counsel certifies that Complaint Counsel conferred with Respondents' counsel by telephone and by email between December 16 and December 18, 2014.

Respondents' counsel do not oppose the relief sought in this motion, except as noted otherwise in the foregoing memorandum.

Dated: December 23, 2014

Respectfully submitted,



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Yan Fang
Kenneth Abbe

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COMPLAINT COUNSEL

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
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Jerk, LLC, a limited liability company,)	
also d/b/a JERK.COM, and)	DOCKET NO. 9361
)	
John Fanning,)	
individually and as a member of Jerk,)	
LLC.)	
_____)	

**[PROPOSED] ORDER GRANTING
COMPLAINT COUNSEL’S MOTION FOR *IN CAMERA* TREATMENT OF
SENSITIVE PERSONAL AND FINANCIAL INFORMATION**

Having considered Complaint Counsel’s Motion for *In Camera* Treatment of Sensitive Personal and Financial Information, and the supporting memorandum and opposing submissions, Complaint Counsel’s Motion is hereby **GRANTED**, permanent *in camera* treatment is **HEREBY** accorded to the following:

1. CX0044, CX0049–CX0050, CX0053, CX0064–CX0070, CX0260–CX0263, CX0265–CX0270, CX0422, CX0425, CX0428, and CX0507, in their entirety;
2. All consumer (1) names, (2) photographs, (3) telephone numbers, (4) addresses, (5) e-mail addresses, and (6) online usernames in any material to be introduced into the evidentiary record for this matter, including any such information in CX0001–CX0040, CX0042, CX0047–CX0048, CX0259, CX0271, CX0403, CX447–CX0449, CX0450, CX0529–CX0545, CX0550–CX0563, CX565–CX0608, CX0610–CX0620, CX0622–CX0624, CX0626–CX0627, CX0745–CX0762, CX0764–CX0765, CX0775–CX0776, CX0810, and Complaint Counsel’s Final Proposed Exhibit List and Final Witness List;
3. All (1) financial account numbers, (2) credit card numbers, (3) financial transaction numbers, (4) tax identification numbers, (5) dates of birth, and (6) personal signatures in any material to be introduced into the evidentiary record for this matter, including any such information in CX0051, CX0054, CX0091, CX0119, CX0237, CX0238, CX0240–CX0247, CX264, CX0402, CX0411–CX0419, CX0421, CX0423–CX0424, CX0427, CX0481, CX0494, CX0735, CX0738, CX0770–773; and

PUBLIC

4. All (1) personal phone numbers, (2) home addresses, (3) personal e-mail addresses, and (4) personal online usernames in any material to be introduced into the evidentiary record for this matter.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date:

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2014, I served a true and correct copy of Complaint Counsel's Motion for *In Camera* Treatment of Sensitive Personal and Financial Information on:

The Office of the Secretary:

Donald S. Clark
Office of the Secretary
600 Pennsylvania Avenue, N.W.
Room H-172
Washington, D.C. 20580

The Office of the Administrative Law Judge

D. Michael Chappell
Chief Administrative Law Judge
600 Pennsylvania Avenue, N.W.
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Dated: December 23, 2014



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John Fanning,)	
individually and as a member of Jerk,)	
LLC.)	
)	
_____)	

ATTACHMENT A
LIST OF EXHIBITS CONTAINING SENSITIVE PERSONAL OR FINANCIAL
INFORMATION AND PROPOSED REDACTIONS¹

MARKED CONFIDENTIAL
REDACTION IN ITS ENTIRETY
REQUESTED

¹ The exhibits attached herein contain Complaint Counsel’s proposed redactions. Complaint Counsel provided unredacted versions of each exhibit to the Court as part of their Final Proposed Exhibit List submitted on December 12, 2014.

CX0001

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1. My name is [REDACTED] I reside in New York, NY. The following statements are within my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. In May 2012, I attempted to obtain a membership with Jerk.com. I registered with the website and paid \$30 for a standard membership. My payment was processed under my MasterCard issued by Bank of America, and my electronic statement discloses that the payment was completed on May 30, 2012. A true and correct copy of that statement entry (with unrelated transactions redacted) is attached to this Declaration as [REDACTED] Attachment A. As part of my registration, I provided Jerk.com with my email address at Gmail. After I provided Jerk.com with my billing information, I was taken to a webpage that stated "Congratulations! You have registered a new account with standard membership. Please visit your email to retrieve your password." A true and correct copy of that webpage is attached to this Declaration as [REDACTED] Attachment B.

3. After paying \$30 to Jerk.com, I monitored my email account for an email message from Jerk.com. I checked all my email folders, including the spam folder. I never received an email message from the company and, thus, never received the promised password needed to access my Jerk.com membership.

4. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 1st, 2012, in New York, New York.

[REDACTED]

[REDACTED] 1

CX0002

MARKED CONFIDENTIAL

Date ↓	Description	Amount	Balance
06/09/2012			---
06/09/2012			
06/08/2012			
06/08/2012			
06/08/2012			
06/08/2012			
06/07/2012			
06/06/2012			
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06/01/2012			
06/01/2012			
06/01/2012			
05/31/2012			
05/30/2012			
05/30/2012	JERK LLC 7819251700 MA	\$30.00	
	Transaction date: 05/29/2012		
	Card type: Mastercard		
	Transaction type: Purchases		
	Merchant description: COMPUTER SOFTWARE STORES		
	Merchant information: 7819251700, MA		
	Beginning balance as of 05/25/2012		

<https://safe.bankofamerica.com/myaccounts/details/card/account-details.go?target=stmtFr...> 10/26/2012

CX0003

MARKED CONFIDENTIAL

Find a Person, an University, or a City

Submit Query

Become A Subscriber

Billing Information

You must be a subscriber member in order to create a dispute!
(If your billing information does not match billing address for credit card, there will be delays in order processing.)

First Name * Last Name *

Email *

Street Address:

City:

State/Region: Postal Code:

Country:

Phone Number:

Gold Membership (under development) Standard membership \$30 / year

Expires: /

Congratulations! You have registered a new account with standard membership. Please visit your email to retrieve your password.

Submit

Attachment B

5/29/2012

http://www.jerk.com/payment_new.php

CX0004

MARKED CONFIDENTIAL

1 DECLARATION OF [REDACTED]

2 1. My name is [REDACTED] I reside in Rio Rancho, New
3 Mexico. The following statements are within my personal knowledge and, if
4 called as a witness, I could and would competently testify thereto.

5 2. Around the end of 2010, a friend of mine told me that she had seen
6 my photo on a strange website on the Internet. Sure enough, when I googled
7 myself, I found that there was a profile of me on the website jerk.com.

8 3. The profile displayed an old Facebook photo of me. Each time I
9 refreshed the page, new questions would pop up on my profile, like "Do you think
10 [REDACTED] is a jerk?", "Is [REDACTED] a bad friend?", and "Do you think [REDACTED] would
11 steal from you?"

12 4. There was a button next to my photo that said, "To Claim This Photo,
13 Click Here." I clicked on the link and it brought me to a customer service page,
14 which requested \$29.95 to send an inquiry about the photo or the website. It was
15 very bizarre to me.

16 5. I did not pay any money to the website, and I could not find any other
17 way to contact jerk.com to remove my profile. I did research on the website and
18 found hundreds of complaints by other customers who had paid money and were
19 unable to remove their profiles.

20 6. I looked around the website and there were photos of young people
21 and children with really horrific, insulting comments about them. For example,
22 there was one profile of a 14-year-old girl that called her a "skank" and a "whore."
23 There was also an option where you could pay to vote someone as "Jerk of the
24 Day."

25 7. I was deeply offended by this website and felt very violated. My
26 photo is still on the website, and it continues to upset and bother me.

27 8. I declare under penalty of perjury that the foregoing is true and
28 correct. Executed on October 23, 2012, in New Mexico.

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CX0005

MARKED CONFIDENTIAL

1 Express to cancel and refund my transaction with jerk.com. American Express
2 credited the \$1.99 to me, but I had to get a new credit card and change my billing
3 address, because I had provided that information to jerk.com.

4 8. I tried to use the "contact us" feature on the website, but the page did
5 not work. I filed complaints to Google, the Iowa Attorney General's Office, and
6 the Federal Trade Commission.

7 9. I have continued to monitor my profile on jerk.com, and new
8 information continues to be added, including photos and content from my LinkedIn
9 page.

10 10. I have been devastated by my experience with jerk.com. I am trying
11 to find a job and make a career change, and because my name and photo are on this
12 website, I don't know what to do.

13 11. I declare under penalty of perjury that the foregoing is true and
14 correct. Executed on 10/10/, 2012, in Missouri.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

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28 [REDACTED]

CX0006

MARKED CONFIDENTIAL

1 DECLARATION OF [REDACTED]

2 1. My name is [REDACTED]. I reside in San Pedro, California. The
3 following statements are within my personal knowledge and, if called as a witness,
4 I could and would competently testify thereto.

5 2. In May 2012, I did a Google search of my name to see what type of
6 information about me was on the Internet. This is when I discovered that I had a
7 profile on the website jerk.com. The search result said, "Is [REDACTED] a jerk?"

8 3. I clicked on the link and it brought me to a jerk.com profile with my
9 name and photo on it. The photo was from an old Facebook profile that I had since
10 closed, and it was a photo of me ~~with my children~~. I had never heard of this
11 website and never gave them permission to post my name or photo.

12 4. I tried to remove my profile by clicking the "Remove Me" button on
13 the website. However, it did not allow me to remove my profile. When I clicked
14 the button, it brought me to a screen requesting my credit card information. The
15 screen said that if I paid the website money, I would be able to remove my profile
16 and my money would be refunded. I do not recall the exact amount requested, but
17 I decided to not provide my credit card information.

18 5. I also wanted to contact the website through the customer support
19 page on the website, but they requested \$25.00 to contact them. I refused to pay to
20 contact customer support.

21 6. Instead, I did some research on jerk.com on the Internet and found an
22 e-mail address that was supposed to be their customer service e-mail account
23 (support@jerk.com). I e-mailed this address over five times, requesting that my
24 profile be taken down and stating that it was illegal for them to use my name and
25 photo without my permission. I never received any response.

26 7. I also filed a complaint with the Better Business Bureau in Delaware.
27 The BBB wrote me a letter that said it had difficulty contacting the company
28 because its address was just a P.O. Box in Delaware.

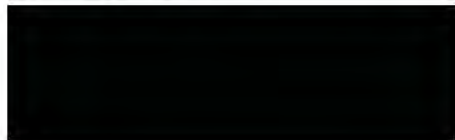
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8. About a month later, I noticed that my photo had been taken down from the website, but my name ^{is} ~~was~~ still there. I am not sure if this is because I sent so many e-mails or not.

9. This experience really affected me. I was in a state of deep depression for weeks after learning about my profile. I am a stable woman, I have been married for fifteen years, and I am a good person. Why am I on jerk.com?

10. It is devastating that there is a website that is destroying people's good character. Some people can commit suicide because of what is on this website.

11. I declare under penalty of perjury that the foregoing is true and correct. Executed on 11/14/2012, 2012, in California.




CX0007

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1. My name is [REDACTED]. I reside in Berkeley, California. The following statements are within my personal knowledge and, if called as a witness, I could and would competently testify thereto.
2. In November 2011, I was looking for employment opportunities. I conducted a Google search of my name to see what results would come up when prospective employers research me.
3. One of the Google search results showed that I was on a website called www.jerk.com. I clicked the link and I found a profile with my photo, name, address, and phone number. The profile also showed that I received one "jerk" vote. My information was put on the website without my permission or knowledge. I believe jerk.com obtained and used my photo from my Facebook page illegally without my permission. I felt frustrated, invaded and violated.
4. I tried to remove my profile by clicking on a page that said I could remove my name from the website if I paid jerk.com \$25.00. I did not want to pay this money, so instead I wrote jerk.com a letter. I sent the letter via certified mail to DMCA Complaints, Jerk LLC, 16192 Coastal Hwy, Lewes, DE 19958 USA, which was the address I found on their website. A true and correct copy of the letter I wrote to jerk.com is attached as [REDACTED] **Attachment A**. The letter was returned to me as "undeliverable" because the address was "unknown" and no forwarding address was available.
5. Because I was looking for work and had been unemployed for quite some time, I felt my profile on this website was affecting my employment chances. I finally decided to pay \$25.00 to remove my profile. To my shocking surprise, once I paid the money, jerk.com did not remove my name, photo, or profile from the website. My profile did not change. I felt cheated.

[REDACTED]

6. Running out of options, I turned to my attorney, Jim Feeney, for advice. A true and correct copy of the email I sent to Jim is attached as  Attachment B.

7. Jerk.com made me feel powerless. Not only did they disregard my rights to my personal information, they also took my money. To this day, I still remember this horrific experience.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on 10/5/12, 2012, in California.



CX0008

MARKED CONFIDENTIAL

[REDACTED]
Berkeley, CA 94708
[REDACTED]

November 28, 2011

DMCA Complaints □Jerk LLC
16192 Coastal Hwy. Lewes, DE 19958 □USA

Regarding: Unauthorized use of our photograph on the Jerk.com web site

Per the instructions on your web site regarding copy write infringement, I am writing to you now to request that you remove our photograph from your web site. We did not authorize the use of this photograph of us, which was illegally taken from one of our Facebook profiles. It is listed as '[REDACTED]'. Please remove this profile ASAP.

We do not see the need to pay you a membership fee in order to request this profile removal online. If necessary we will work with our lawyer, cc'd in this letter, to take legal action and sue your company for defamation and unauthorized use of a private, personal picture. We would also contact the Better Business Bureau and State Attorney General's office if we do not see this profile removed from your web site soon.

Thanks in advance for your prompt attention to this matter.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

CX0009

MARKED CONFIDENTIAL

From: [REDACTED]
Date: Sun, Jan 15, 2012 at 5:34 PM
Subject: Re: Checking in
To [REDACTED]

Hi [REDACTED]. HOpe you had a nice weekend. Just wanted to see if you knew a way for me to get this web site to take down my profile and unauthorized use of photo of me and my wife/then-fiance: <http://www.jerk.com/profile> [REDACTED]

Their web site has detailed instructions: <http://jerk.com/copyright.php>

I did as they said and sent the attached letter, but it was returned undeliverable, address unknown, no forwarding address, so I then followed their other instructions and went ahead and paid their \$25 extortion money to send an email to them, in which I again request that they remove my profile, citing the unauthorized use of my photo for personal use only, etc. But the profile and photo is still up. My wife also filed an online complaint with the ICC but no word back yet.

Any way to take legal action (or at least threaten it)?

Your advice would be greatly appreciated.

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]
Berkeley California 94708
[REDACTED]

"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has."

Margaret Mead

CX0010

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1
2 1. My name is [REDACTED]. I reside in Washington, District of
3 Columbia. The following statements are within my personal knowledge and, if
4 called as a witness, I could and would competently testify thereto.

5 2. One day at work during April 2012, my co-workers and I decided to
6 do a Google search of our names on the internet. One of my co-workers told me
7 that my name was on a website called jerk.com.

8 3. I visited the website and thought it was very strange. The jerk.com
9 profile contained a Facebook photo of me and displayed my first and last name. I
10 had never heard of this website and never gave anyone permission to use my name
11 or photograph. I decided to ignore the website for the time being.

12 4. A few weeks later, I decided to revisit the website. I work for an
13 elected official on Capitol Hill, and I had just finished a meeting on cybersecurity
14 with two men. I walked by them and noticed that they were looking at their
15 smartphones and giggling about something. It made me feel uncomfortable and I
16 had a feeling it had something to do with my jerk.com profile.

17 5. I searched my name on Google again, and this time, when I clicked on
18 the link ^{from the Google Search} entitled "Is [REDACTED] a jerk?", I was brought ^{directly} to a jerk.com web page that was
19 loaded with vile, hardcore pornography. There were about two columns of more
20 than 10 disturbing pornographic images of women and other body parts, and I
21 refused to look through the whole page. *IT WAS GROSS.*

22 6. My name did not appear on the page with the pornographic images,
23 but that page was linked directly to my name on a Google search. I was horrified
24 and disturbed to have these images connected to my name.

25 7. I proceeded to do research on jerk.com on the internet, but avoided
26 going back to the actual website. On the internet I learned that I would have to pay
27 jerk.com to remove my name, which I absolutely did not want to do. Instead, I
28 filed a complaint with Google, asking them to remove this website associated with
[REDACTED]

1 my name.

2 8. I searched my name two or three more times after I filed the
3 complaint, and the porn images were still associated with my jerk.com profile.
4 However, a month later in May 2012, the page disappeared. When I clicked on the
5 search result in Google, I was brought to a page that said, "[REDACTED] has
6 asked for this profile and URL to be removed." Today, the profile is no longer
7 there.

8 9. Jerk.com really affected me. I have completely removed myself from
9 all social media. This experience really demonstrates the power and dangers of the
10 Internet. Jerk.com is an internet bully. I had the emotional capacity and efficacy
11 to deal with this situation, but I worry about how it could affect other victims,
12 especially children.

13 10. I declare under penalty of perjury that the foregoing is true and
14 correct. Executed on November 14th, 2012, in the District of Columbia.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

CX0011

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1
2 1. My name is [REDACTED]. I reside in Saint Paul, Minnesota. The
3 following statements are within my personal knowledge and, if called as a witness, I could and
4 would competently testify thereto.

5 2. After doing a Google search on my name in 2012, I discovered a profile of me
6 under jerk.com as one of the top five Google hits under my full name.

7 3. When I visited jerk.com, I found a photo of me and my husband that I uploaded to
8 Facebook in November 2009. This picture clearly was taken from my Facebook page even
9 though that page is only accessible to people I have accepted as friends. The jerk.com profile
10 contained no other information on me other than this photo. I did not authorize anyone to post
11 my information on jerk.com and do not know how my photo appeared on this website.

12 4. While viewing my profile on jerk.com, I clicked on a link labeled "Remove Me."
13 This link took me to a page informing me that my profile could not be deleted.

14 5. I subsequently tried to contact the company through the "Contact Us" link on
15 jerk.com to ask that my profile be removed. The Contact Us link took me to a form. After
16 filling in my name, email address, and a message requesting that my profile be removed, I found
17 that the message could not be sent, and I was asked to provide my credit card information. I did
18 not provide my credit card number, but hoped that my request had been received.

19 6. After filling out the form provided, I heard nothing from the company, and went
20 back to check jerk.com to see if my profile was still visible on the website. Even though I could
21 access jerk.com, I could not access my profile because it showed up as blocked. I could not
22 access that profile from my computer for some time. In a subsequent visit to the website using a
23 different computer, however, I found that my profile had not been removed and was no longer
24 blocked.
25

1 7. While on the website, I noticed that the company suggests that people pay to have
2 their profiles removed. This sounded like a scam, so I contacted the Minnesota Attorney
3 General's Office for help.

4 8. In February 2012, I asked the Minnesota Attorney General's Office for help to
5 have my profile removed from jerk.com. In a letter dated March 9, 2012, the Attorney General's
6 Office asked Jerk LLC to respond to my request that my profile be removed from jerk.com.
7 True and correct copies of this letter, as well as the Attorney General's letter to me
8 acknowledging my complaint and enclosing the Office's letter to Jerk LLC, are attached as
9 Attachments A and B, respectively, to this declaration.

10 9. In spite of being contacted several times by the Attorney General's Office, Jerk
11 LLC did not respond until April 20, 2012. True and correct copies of the Attorney General's
12 further requests for a response from Jerk LLC, and the Attorney General's letters enclosing
13 copies of these letters to me, are attached as Attachments C, D, E and F to this declaration.

14 10. In the April 20, 2012 letter, the attorney for Jerk LLC questioned the basis for my
15 removal request, and informed the Attorney General's Office that the company could find no
16 record of my profile on its website. A true and correct copy of this letter from Jerk LLC's
17 attorney, and the letter sent to me by the Attorney General's Office enclosing this response, are
18 attached to this declaration as Attachments G and H, respectively.

19 11. I informed the Attorney General's Office that, contrary to Jerk's assertion, my
20 profile was still being displayed on the jerk.com website. The Attorney General's Office again
21 wrote to Jerk LLC on my behalf and asked the company to remove my profile from the website.
22 True and correct copies of this letter, dated June 4, 2012, and the letter the Attorney General sent
23 to me enclosing this letter, are attached to this declaration as Exhibits I and J, respectively.

24 12. On August 10, 2012, the Attorney General's Office sent another letter to Jerk
25 LLC asking the company to respond to its June 4th letter. True and correct copies of this letter

1 and the letter the Attorney General's Office sent to me enclosing this letter, are attached to this
2 declaration as Exhibits K and L, respectively.

3 13. On October 24, 2012, the attorney for Jerk LLC wrote a response to the Attorney
4 General's Office, and refused to remove my profile from jerk.com. True and correct copies of
5 this letter of refusal, and the letter the Attorney General's Office sent to me enclosing this letter,
6 are attached to this declaration as Exhibits M and N, respectively.

7 14. On November 8, 2012, I attempted to contact Jerk LLC's attorney, Maria Speth,
8 by telephone. I was hoping to have a conversation with her regarding the removal of the
9 jerk.com profile that was created under my name. I left Ms. Speth a voicemail requesting that
10 she please contact me regarding my profile. I received a voicemail on November 12th from a
11 woman named Debbie who was from Ms. Speth's office. Debbie's voicemail stated that Ms.
12 Speth had asked her to return my call. Debbie stated that Ms. Speth was legal counsel for Jerk
13 LLC and that Ms. Speth cannot make any decision regarding the posting of my profile. And she
14 suggested that I look at the jerk.com website under the contact information. Therefore, I was not
15 allowed to speak with Ms. Speth.

16 15. In March 2013, I searched my name again on Google to see if the jerk.com result
17 was still there. I found that a new picture from my Facebook page was posted on my jerk.com
18 profile, and the previous picture was gone. This new picture shows me and my husband, mother,
19 and mother-in-law in September 2012. I don't know how jerk.com got this picture because my
20 Facebook page has always been private to friends only.

21 16. In April 2013, I did another Google search and did not see any hits for jerk.com
22 with my name. When I searched my name on jerk.com, my name did not pop up. The website
23 never went past the search bar page and just came up as a black background. I am not sure if
24 their search page is not working or if my name is no longer searchable.

1 17. I have spent around 20 to 40 hours trying to remove my jerk.com profile. My
 2 experience proves that Jerk LLC is not interested in taking steps to remove my profile. I am
 3 worried about this because I am an author. If people search me and the search results show a
 4 jerk.com entry, it really affects my business. This website is basically an invitation to others to
 5 write about me. I am also irritated by the pictures because they ^{also} show my family members ~~and~~
 6 ~~drag them into the website. And they charge money to get a profile removed. This is also~~
 7 ~~copyright infringement.~~ ^{They require} ^{remove a profile, which is}

8 I declare under penalty of perjury that the foregoing is true and correct.

9
 10 Executed on June 13th, 2013, in Saint Paul, Minnesota.



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 14 Clearly, Jerk.com admits there was a profile of me on
 15 their website or they would not have "respectfully
 16 declined..." my request for removal of the profile
 17 in their attorney's response attached to this
 18 declaration as Exhibit M. Previously, their
 19 attorney stated they were "... unable to find
 20 any such profile," in a response attached to
 21 this declaration as Exhibit G.

22 I find this company to be untruthful, deceiving
 23 and uncooperative. I believe they have
 24 infringed on my 4th amendment right to privacy,
 25 as well as Copyright infringement on photos they
 have obtained from my Facebook profile.

CX0012

MARKED CONFIDENTIAL



STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

March 9, 2012

102 STATE CAPITOL
ST. PAUL, MN 55155
TELEPHONE: (651) 296-6196

Jerk, LLC
16192 Coastal Highway
Lewes, DE 19958

Dear Sir or Madam:

This Office was contacted by Ms. [REDACTED] a Minnesota citizen.

Ms. [REDACTED] states that a profile regarding her and her husband is listed on the website www.jerk.com. Ms. [REDACTED] states that the profile contains her name and a picture from her Facebook account. Ms. [REDACTED] would like the profile removed from www.jerk.com.

I ask that you review this matter as quickly as possible and address Ms. [REDACTED] concerns. I ask that you send a written response to this Office within ten (10) days of receiving this letter. Please provide a response to this Office at the following address:

Chuck Ferguson
Minnesota Attorney General's Office
445 Minnesota Street, 1400 Bremer Tower
St. Paul, MN 55101-2131
Fax: (651) 282-2155

I thank you for your attention to this matter.

Sincerely,

LORI SWANSON
Attorney General

cc: Ms. [REDACTED]
Mr. Chuck Ferguson, Manager of the Consumer Services Division

AG: # [REDACTED]



Attachment A

CX0013

MARKED CONFIDENTIAL



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

March 9, 2012

102 STATE CAPITOL
ST. PAUL, MN 55155
TELEPHONE: (651) 296-6196

Dear Ms. [REDACTED]:

I thank you for your e-mail correspondence dated February 25, 2012, and for providing your address on February 29, 2012.

You ran a Google search on your name and found a profile for you and your husband on the website *www.jerk.com* ("Jerk.com"), which contained a picture from your Facebook account. You clicked the "remove" link on the profile and were told that the profile could not be deleted. You subsequently attempted to contact Jerk.com through its "contact us" link, but after completing your message and providing your name and e-mail address, you could not send the message and were asked to provide your credit card information. Jerk.com has since blocked your IP address and you are unable to access the profile. You want Jerk.com to delete the profile and ask for any assistance this Office can provide.

I understand your concerns. It must be very frustrating to have your information posted on this type of website. The problem must only be made worse by having to pay a fee to have control over the information. I can tell you the following, which I hope will be helpful:

First, I enclose a letter we sent to Jerk, LLC asking it to address your concerns. We will let you know of its response.

Second, while the Internet has many positive aspects, it also has a darker side. Indeed, scam artists are increasingly misusing photos and posting false information about individuals and companies online in an attempt to defraud. This practice, known as "brand fraud," "brand abuse," or "brand jacking," can tarnish a company or citizen's reputation.

Third, under the federal Communications Decency Act, an entity has broad immunity from liability for the information published on its website, as long as the website operator itself does not create or alter the content of that information. In light of the widespread and often permanent nature of publishing such information on the Internet, better regulation of these businesses is necessary. Some have suggested that one way this might be accomplished is to require the websites to provide a simple mechanism for consumers to remove their information from the website. Another proposal is to require consumers to take affirmative steps to "opt-in" before these types of websites can publish or otherwise use consumers' information.

Attachment B

CONFIDENTIAL - FTC Docket No. 9361

FTC-JERK0001496

CX0013-001

Ms. [REDACTED]
March 9, 2012
Page 2

Fourth, the Federal Trade Commission is the federal agency with authority to take action in cases involving fraudulent, deceptive, and unfair business practices in the marketplace. I strongly encourage you to file a complaint with the Federal Trade Commission as follows:

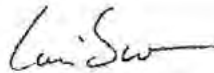
Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue NW
Washington, DC 20580
Toll-free helpline: 1-877-382-4357

Fifth, I have sent a copy of this letter to Deputy Attorney General Nate Brennaman, who I recently asked to look into this type of practice.

Finally, I enclose an insert, *How the Attorney General's Office Can Help*, that explains in some more detail the ways in which this Office tries to help people with consumer complaints. The document also describes some of the limitations on the Office's authority and provides information about other regulatory and judicial forums that can be appropriate places to file certain types of complaints.

I thank you again for your correspondence.

Sincerely,



LORI SWANSON
Attorney General

Enclosures: *Public Information and the Internet*
How the Attorney General's Office Can Help
Correspondence to Jerk, LLC

cc: Deputy Attorney General Nate Brennaman

AG # [REDACTED]

CX0014

MARKED CONFIDENTIAL

March 28, 2012

Jerk, LLC
16192 Coastal Highway
Lewes, DE 19958

Re: Ms. [REDACTED]

File No: [REDACTED]

Dear Sir/Madam:

This Office recently asked Jerk, LLC to respond to concerns received from Ms. [REDACTED]. To date, we have not yet received any response to our letter to Jerk, LLC.

I enclose another copy of our initial correspondence to Jerk, LLC and ask that you respond to this Office within seven (7) days.

I appreciate your attention to this matter. Please contact me at the telephone number listed below if you have any questions.

Sincerely,

/s/

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Initial Correspondence to Jerk, LLC

cc: Ms. [REDACTED]
AG: # [REDACTED]

Attachment C

CX0015

MARKED CONFIDENTIAL



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

March 28, 2012

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2137
TELEPHONE: (651) 296-7575



Re: Jerk, LLC

File No: [Redacted]

Dear Ms. [Redacted]

I wanted to keep you informed about the status of our attempts to assist you with your concerns involving Jerk, LLC. As you know, we previously sent Jerk, LLC a letter regarding your concerns. To date, this Office has not received a response from Jerk, LLC. Accordingly, I have sent Jerk, LLC a second letter asking for its response.

If Jerk, LLC responds to our letter, I will send a copy of its response to you. If Jerk, LLC has already contacted you or should contact you in the future directly to resolve this matter, please notify me as soon as possible so that we can update our records.

I thank you again for contacting this Office.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence to Jerk, LLC
AG: [Redacted]

Attachment D

CONFIDENTIAL - FTC Docket No. 9361

FTC-JERK0001499

CX0015-001

CX0016

MARKED CONFIDENTIAL

April 17, 2012

Jerk, LLC
16192 Coastal Highway
Lewes, DE 19958

Re: Ms. [REDACTED]
File No: [REDACTED]

Dear Sir/Madam:

This is the third time this Office is sending Jerk, LLC a letter regarding the concerns we received from Ms. [REDACTED]. To date, we have not received any response from Jerk, LLC. This matter deserves the courtesy of a response, and this Office expects that a company that does business in Minnesota will respond to concerns raised by Minnesota citizens in a timely fashion.

I enclose a copy of our initial correspondence for your review. I ask that you please direct your immediate attention to this matter and respond to me within five business days of this letter. If you have any questions, please contact me immediately.

I should note that this Office does maintain files regarding consumer complaints, and our files will reflect your response or any failure to respond. I would appreciate your prompt attention to this matter.

Sincerely,

/s/

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Initial Correspondence to Jerk, LLC

cc: Ms. [REDACTED]
AG: [REDACTED]

Attachment E

CX0017

MARKED CONFIDENTIAL



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

April 17, 2012

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 796-7575



Re: Jerk, LLC

File No: [REDACTED]

Dear Ms. [REDACTED]

I wanted to update you on the status on our attempts to contact Jerk, LLC ("Jerk") regarding your concerns.

I enclose a copy of another letter that I sent to Jerk on your behalf. The purpose of this letter is to see if we can finally prod Jerk into providing a response. If I do get a response from Jerk, I will promptly forward it to you. In the meantime, if you have received a response from Jerk or if Jerk should contact you in the future to resolve the matter, I ask that you please let me know right away so that I can update our records.

I thank you again for contacting this Office.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence to Jerk, LLC
AG: [REDACTED]

Attachment F

CONFIDENTIAL - FTC Docket No. 9361

FTC-JERK0001501
CX0017-001

CX0018

MARKED CONFIDENTIAL



1100 N CENTRAL AVENUE, 30TH FLOOR, PHOENIX, AZ 85012
jaburgwilk.com

TO: 6512822155

P.2

Maria Crimi Speth

mcs@jaburgwilk.com
602.248.1089 - Direct Phone
602.248.0522 - Main Fax

April 20, 2012

Via Facsimile (651) 282-2155

Lori Swanson
Joseph Stepan
Chuck Ferguson
Minnesota Attorney General's Office
445 Minnesota Street, 1400 Bremer Tower
St. Paul, MN 55101-2131

Gary J. Jaburg
Lawrence E. Wilk
Roger J. Calica
Mitchell Reichman
Beth S. Cohn
Kraig J. Marston
Scott J. Richardson
Ronald M. Horwitz
Kath M. Sandoyas
Mareyn T. Brande
Lauren L. Ganser
Maria Crimi Speth
Michelle C. Jansbina
Neal H. Bookspan
James H. Koening
Mark D. Bogard
David N. Farren
Valerie L. Manciano
David L. Allen
Laurence B. Hirsch
Susan E. Wells
Bridget O'Brien Swartz
Jennifer R. Erickson
Hemec Gerstman
Nathan D. Meyer
Kelly Brown
Adam S. King
Laura A. Hupst
Sharon R. Sprague
Amy M. Horwitz
Nichole H. Walk

Re: Ms. [REDACTED]
Your File No. [REDACTED]

Dear Ms. Swanson, Mr. Stepan and Mr. Ferguson:

This firm has been retained by Jerk, LLC to respond to your letters of March 9, 2012 and March 28, 2012. I left a voice message at your office last week, but I have not received a return call.

Your letter does not explain the basis for your request that Jerk, LLC remove a profile regarding [REDACTED]. It seems highly unusual that the Attorney General has made such a request. Please let me know whether there is a connection to an active case or investigation, or if you contend that my client has violated any law.

Also, you should know that upon receipt of your letter, my client searched for the profile of [REDACTED] and was unable to find any such profile. It may have been removed using a tool available on the website.

I look forward to hearing from you regarding the reason for your request as well as confirmation that this matter is closed.

Sincerely,

JABURG & WILK, P.C.

Maria Crimi Speth
Maria Crimi Speth

cc: Client

9999-999/MCS/MCS/976287_v1

Attachment G

CX0019

MARKED CONFIDENTIAL



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

May 8, 2012

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 296-7375



Re: Jerk, LLC
File No:

Dear Ms.

You previously contacted this Office for assistance with a problem involving Jerk, LLC. I enclose a copy of a response this Office received from Jerk, LLC.

As you will note, Jerk, LLC. indicates that the profile in question has been removed.

I ask that you review the enclosed response and give me a call or send me your thoughts on the matter so that we can further discuss whether this Office can be of additional assistance to you.

I look forward to hearing from you.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence from Jerk, LLC

AG: #

CX0020

MARKED CONFIDENTIAL



STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

June 4, 2012

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 296-7575

Jerk, LLC
16192 Coastal Highway
Lewes, DE 19958

Re: Ms. [REDACTED]
File No: [REDACTED]

COPY

Dear Sir/Madam:

This Office was contacted by Ms. [REDACTED] regarding a matter she has with Jerk, LLC.

In its letter dated April 20, 2012, Jerk indicates that it had no record of a profile on its website relating to Ms. [REDACTED]. Despite this Ms. [REDACTED] indicates that she recently found that a profile using her image and likeness without her permission continues to be displayed on Jerk.com. I ask that Jerk LLC. remove the profile in question immediately.

I ask that you respond to this Office in writing within ten (10) days of receiving this letter.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

cc: Ms. [REDACTED]

AG: # [REDACTED]

CX0021

MARKED CONFIDENTIAL



STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

June 4, 2012

SUITE 1100
445 MINNESOTA STREET
ST. PAUL, MN 55103-2131
TELEPHONE: (651) 296-7575



Re: Jerk, LLC

File No: [REDACTED]

Dear Ms. [REDACTED]

I thank you for providing additional information regarding your concerns about Jerk, LLC.

I enclose a letter I sent to Jerk, LLC with the additional information. I have requested that it consider this information in responding to your concerns.

I will notify you when I receive a response from Jerk, LLC. In the meantime, please feel free to contact me at anytime. In addition, if Jerk, LLC should contact you directly to resolve the matter, I ask that you please be sure to let me know right away so that I can update our records.

I thank you for supplying the additional information.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence to Jerk, LLC

AG: # [REDACTED]

Attachment J

CONFIDENTIAL - FTC Docket No. 9361

FTC-JERK0001505
CX0021-001

CX0022

MARKED CONFIDENTIAL

August 10, 2012

Jerk, LLC
16192 Coastal Highway
Lewes, DE 19958

Re: Ms. [REDACTED]
File No: [REDACTED]

Dear Sir/Madam:

This Office recently asked Jerk, LLC to respond to concerns received from Ms. [REDACTED]. To date, we have not yet received any response to our letter to Jerk, LLC.

I enclose another copy of our initial correspondence to Jerk, LLC and ask that you respond to this Office within seven (7) days.

I appreciate your attention to this matter. Please contact me at the telephone number listed below if you have any questions.

Sincerely,

/s/

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence to Jerk, LLC

cc: Ms. [REDACTED]
AG: # [REDACTED]

Attachment K

CX0023

MARKED CONFIDENTIAL



STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL

LORI SWANSON
ATTORNEY GENERAL

August 10, 2012

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 296-7575



Re: Jerk, LLC
File No: [REDACTED]

Dear Ms. [REDACTED]

I wanted to keep you informed about the status of our attempts to assist you with your concerns involving Jerk, LLC ("Jerk"). As you know, we previously sent Jerk a letter regarding your concerns. To date, this Office has not received a response from Jerk. Accordingly, I have sent Jerk a second letter asking for its response.

If Jerk responds to our letter, I will send a copy of its response to you. If Jerk has already contacted you or should contact you in the future directly to resolve this matter, please notify me as soon as possible so that we can update our records.

I thank you again for contacting this Office.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence to Jerk, LLC
AG: [REDACTED]

Attachment L

CONFIDENTIAL - FTC Docket No. 9361

FTC-JERK0001507
CX0023-001

CX0024

MARKED CONFIDENTIAL



200 N. CENTRAL AVENUE, 20TH FLOOR, PHOENIX, AZ 85012

jaburgwilk.com

Maria Crimi Speth

mcs@jaburgwilk.com
602.248.1089 - Direct Phone
602.248.0522 - Main Fax

October 24, 2012

Joseph Stepan
Consumer Services Division
State of Minnesota
Office of the Attorney General
Suite 1400
445 Minnesota Street
St. Paul, MN 55101-2131

Gary J. Jaburg
Lawrence E. Wilk
Roger L. Cohen
Mitchell Reichman
Beth S. Cohn
Kraig J. Marton
Scott J. Richardson
Ronald M. Horwitz
Kath M. Sandweiss
Mervyn T. Graude
Lauren L. Garner
Maria Crimi Speth
Michelle C. Lombino
Neal H. Bookspan
Janessa E. Koenig
Mark D. Bogard
David N. Farren
Valerie L. Marciano
David L. Allen
Laurence B. Hirsch
Susan E. Wells
Bridger O'Brien Swartz
Jennifer P. Erickson
Renee Gerstman
Nathan D. Meyer
Kelly Brown
Adam S. Kuz
Laura A. Rogal
Amy M. Horvitz
Nichole H. Wilk
Gregory T. Harris
Jeffrey A. Silence

Re: Ms. [REDACTED] File No. [REDACTED]

Dear Mr. Stepan:

This is in response to your letter of October 16, 2012. Jerk, LLC has respectfully declined your request for removal.

Sincerely,

JABURG & WILK, P.C.

Maria Crimi Speth

16442-1/MCS/MCS/1015363_v1

Attachment M

CX0025

MARKED CONFIDENTIAL



LORI SWANSON
ATTORNEY GENERAL

STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

November 7, 2012

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651)296-7575



Re: **Jerk, LLC, Jaburg/Wilk,**
File No:

Dear Ms

I enclose a copy of correspondence I received from Jaburg/Wilk for Jerk, LLC. Unfortunately, as you can see, Jerk, LLC, does not appear willing to resolve your concerns as you have requested. Thus, at this juncture, I thought I would provide you with the following information.

If you are aware of any new information or material discrepancies that you would like me to review, I ask that you let me know.

In addition, I should note that because we are not a regulatory agency, we do not have the authority to order an organization to respond to an individual consumer complaint or to take a particular course of action in a given case. That having been said, we do retain a record of all consumer complaints—and we use this information both to inform the public about problem areas and, in some cases where a pattern or practice of complaints shows that the public interest has been impacted by illegal conduct, to file lawsuits in the name of the State of Minnesota to enforce State laws. Thus, even though the organization has not responded favorably to your individual situation, we do very much appreciate receiving your correspondence.

I thank you again for contacting this Office. If you have any questions, please feel free to give me a call.

Sincerely,

JOSEPH STEPAN
Consumer Services Division
(651) 355-0705 (Voice)
(651) 282-2155 (Fax)

Enclosure: Correspondence from Jaburg/Wilk
AG:



CX0026

MARKED CONFIDENTIAL

1 DECLARATION OF [REDACTED]

2 1. My name is [REDACTED]. I reside in Franklin, Wisconsin. The
3 following statements are within my personal knowledge and, if called as a witness,
4 I could and would competently testify thereto.

5 2. In September 2011, I performed a search of my first and last name on
6 Google out of curiosity. Far down the list of search results, I saw that my name
7 appeared on a website called jerk.com. The title of the search result was, "[REDACTED]
8 [REDACTED] is a Jerk."

9 3. I clicked on the link, and it brought me to jerk.com's website. There,
10 I found a photo of me with my ex-boyfriend, which I had posted only on Facebook
11 and set to "private." I do not know how the photo got on this website. Under my
12 photo, there were buttons that allowed viewers to vote whether I was a jerk or not.
13 There were several votes labeling me as a jerk.

14 4. I was shocked and frustrated that I was on this website. I tried to edit
15 the profile, but I could not make any changes. I even tried to counterbalance the
16 negative votes against me by attempting to vote myself as "not a jerk," but that
17 button would not work. Only the "jerk" button worked.

18 5. I desperately wanted to eliminate my name, photo, and profile from
19 jerk.com. I explored the website, searching for a way to remove my profile. At
20 several points, the website asked me to submit my credit card information in order
21 to make a change to my profile. I cannot remember if it was the "membership"
22 button, or the "customer service" button that triggered this payment prompt.
23 I recall that the message about changing my profile included a request for a credit
24 card payment through PayPal. I believed I could edit my profile if I paid jerk.com
25 the requested fee, so I set up a PayPal account in order to make a payment.

26 6. I paid between \$10.00 and \$25.00 to jerk.com through PayPal in an
27 attempt to remove my profile from the website. I cannot remember the specific
28 amount. Immediately after I made the payment, I found that there were no new
[REDACTED]

1 features available to me that would allow me to remove my profile. I kept trying,
2 and at one point, a pop-up window appeared that said, "Are you having fun yet?"
3 At that moment, I knew the website was a scam.

4 7. I went to the customer service page to file a complaint. The website
5 asked for another \$10.00 to \$25.00 to speak to customer service, but I did not pay.
6 I did a Google search to find the company's contact information, and found a
7 telephone number and e-mail address. The phone number was out of service, and I
8 received no response to my e-mail.

9 8. I filed a dispute with PayPal for the payments I made to jerk.com. I
10 cannot remember the exact total amount I paid to the website, but I estimate it to be
11 about \$25.00. I also filed complaints with the Better Business Bureau, the
12 Wisconsin Attorney General's Office, and a local attorney. To date, I have not
13 been able to remove my photo or profile from the website.

14 9. More recently, I discovered that someone called me an "incest
15 survivor" on my jerk.com profile, and this profile now comes up as the first search
16 result when a Google search of my name is done. There is also a new hyperlink on
17 the profile that links to my LinkedIn profile.

18 10. Every time I look at the website I cry. It really interferes with my
19 social life, as I am a single mother and currently dating. It is slanderous and
20 horrifying, and I just want to find out who is posting this stuff and punish them.

21 11. I declare under penalty of perjury that the foregoing is true and
22 correct. Executed on October 19, 2012, in Wisconsin.

"Amendment #1"

Sep 18, 2012

to Natalie

Hello Natalie,

I spent some time this evening reviewing my records and the website and was able to confirm a few things:

I did pay \$30.00 in February of this year to buy a standard subscription which was explained on the site to be the path to changing or removing the information that I had found about me. Before you take the steps to join, there is a click option to remove your information, which leads you to another page telling you you can't remove it. It leads to a notice that in part states "No one's profile is ever removed because jerk is based on a free open Internet searching database and it's not possible to remove things from the Internet" It also tells you that you must subscribe to create a dispute, and that subscription cost is \$30.00, which I did do. If you click the "Contact Us" option, it circles around to this message again, or you can opt to pay another \$25.00 to request a removal, which they have basically told you is impossible, and is discerned entirely at their discretion. What a contradiction! They also have a "Gold" subscription option which is under development and the fee is undisclosed. I tried to remove my pictures again today after I gave them my email address and telephone number and created an account allowing me to sign in. I could not access any of the posted information about me even though it linked me to it.

Ironically, the website is full of information about copyright infringement and they have an address you can write to: DMCA complaints, Jerk LLC, 16192 Coastal Hwy, Lewes, DE 19958, which I suspect is bogus as well.

As far as the fees, I was charged on my credit card, but due to the contact I made with my card company, they credited my account back, but I was not refunded by either Pay Pal, or Jerk.com. I do have documentation now of my dispute with Pay Pal (reference numbers, transaction #'s) to substantiate this. Cowards.

Thank you for your help. I hope you are able to bring some justice to this ugly and immature site. I saddens me so much when I deal with people everyday who are struggling to maintain a quality of life and life itself sometimes, to know that there are useless people out there that serve no meaningful purpose other than to act so ruthlessly, with no dignity or regard.



CX0027

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1
2 1. My name is [REDACTED] I reside in Dearborn, Michigan. The
3 following statements are within my personal knowledge and, if called as a witness,
4 I could and would competently testify thereto.

5 2. In early 2012, my younger brother, who is twelve years old, told me
6 that he did a Google search of his name. He told me he discovered that there was a
7 profile of him on the website jerk.com. He indicated that the profile came up as
8 the second or third search result on Google.

9 3. I visited the website jerk.com and found a profile for my younger
10 brother. The profile displayed a photo taken of my brother when he was eleven
11 years old. The photo was taken from a Facebook account, and my brother told me
12 that he never gave anyone permission to use it on jerk.com. The profile also
13 revealed his name and his age.

14 4. My brother appeared to be very upset about the profile. He told me he
15 tried to log in to jerk.com with every e-mail address he had, but he could not get in
16 to the website to remove his name or photo. It appears that someone else created
17 the profile, and he told me that he did not know who did it.

18 5. We wanted to contact jerk.com's customer service to try to remove
19 my brother's profile, but it said on the website that we had to pay \$25.00 to talk to
20 someone. We did not end up paying any money to jerk.com.

21 6. I did some research about jerk.com on the Internet and found that
22 there were thousands of complaints against this company. I never got the chance
23 to complain to anyone at jerk.com because there was no way to contact the
24 company.

25 7. In February 2012, I filed a complaint with the Better Business Bureau
26 in Delaware on behalf of my brother. The BBB told us that they contacted the
27 company about our complaint, but no one from jerk.com ever got back in touch
28 with them. No one from Jerk ever contacted me.

1 8. As of October 2012, my little brother's profile is still on jerk.com.
2 There is one vote that claims he is "not a jerk," but the profile is still very upsetting
3 to my brother and my family.

4 9. I've noticed that my brother has really been affected by his experience
5 with jerk.com. For a twelve-year-old who is almost starting high school and who
6 knows that his name is on that website, ^{it has damaged} it has just killed his self-esteem. The
7 whole website is a horrible idea and I believe Jerk should at least allow kids to
8 remove themselves from the website.

9 10. I declare under penalty of perjury that the foregoing is true and
10 correct. Executed on October 26, 2012, in Michigan.



CX0028

MARKED CONFIDENTIAL

1 complaint to the Chilling Effects, which then publicly displayed my complaint on its website. A
2 true and correct copy of my complaint to Google posted on the Chilling Effects website is
3 attached as Attachment B.

4 8. I am a very private person with a unique name, so discovering a jerk.com profile
5 associated with it was traumatic and had a negative impact on my health. I knew that recruiters
6 and potential employers routinely use Google to check a person's online reputation, which
7 anyone could also do for personal reasons, and they would be exposed to this site's damaging
8 profile. My relationship with the Internet also has changed in that I avoid any search that could
9 bring this profile up, avoid social media, and I have taken steps to protect my reputation online.

10 9. I declare under penalty of perjury that the foregoing is true and correct.

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Executed on December 16, 2013, in Belmont, California.



CX0029

MARKED CONFIDENTIAL

7/2/12

Jerk : [redacted] is a jerk

0

Phone Answering Service

Answer, Manage, & Route Calls. Try It Free For 6-Months.
www.eVoice.com

Legal Help for Employees

Help to Return from Pregnancy Leave Discrimination & Disabilities
www.pamelapitt.com

2012 Summer Olympics

Coverage of Olympic Fencing. The Games Begin July 27th @ 7:30pm
NBCOlympics.com

Exempt vs. Non-Exempt

Employee Classification Webcast - Get HRCI Credit, \$129. 7/26 2pm CST
www.likeller.com

[redacted] is a Jerk

Recommend this on Google

Do you think [redacted] is unpredictable?

Agree Disagree



votes: 8/

Jerk Not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

Find a Person, an University, or a City

Legal Help for Employees

Help to Return from Pregnancy Leave Discrimination & Disabilities
www.pamelapitt.com



[redacted] information - including email, business address, business phone, biography, title, company, jobs and ...

MyLife™

ntly. With MyLife™'s powerful people search engine, you can reunite

... qualified referees for Bay Cup events
an ongoing problem that Hazel mentioned, though

CX0030

MARKED CONFIDENTIAL

Chilling Effects

Home | Weather Reports | Report Receiving Sending a C&D Notice | Search the Database | Topics

Topic Home | FAQs
Monitoring the legal climate for Internet activity

[Chilling Effects Clearinghouse](#) > [DMCA Notices](#) > [Notices](#) > Photo DMCA (Copyright) Complaint to Google (NoticeID [REDACTED])
[http://chillingeffects.org/\[REDACTED\]](http://chillingeffects.org/[REDACTED])

Print-friendly

Photo DMCA (Copyright) Complaint to Google

July 14, 2012

Sender Information:

Sent by: [REDACTED]

US

Recipient Information:

Google, Inc. [Googleplus]

Mountain View, CA, 94043, USA

Sent via: online form: Form

Re: Infringement Notification via Googleplus Complaint

Google Form: [copyright](#) DMCA Complaint of alleged copyright infringement

1. Complainant's Information

Name:

Company name:

Full legal name of the copyright holder: [REDACTED]

Country of residence: US

2. Your copyrighted work

Location of copyrighted work (where your authorized work is located):

I have the image in my photo collection. It was a photo on Facebook when I had a Facebook account, but I closed my account 1.5 years ago. My profile was always closed and set to high privacy, and no photos of me can be found on the web anywhere until this infringement.

Description of the copyrighted work:

A photograph of me and my cousin: one of us is in all black, and the other in a purple shirt and white pants. It's the only "profile" picture of me on this evil website.

I am the exclusive holder of the copy right of the photo used on this page

Attachment B

FAQ: Questions

- [Why does a search engine get DMCA takedown notices for materials in its search listings?](#)

Related News

- [Google asked to remove 100 million 'piracy' links in 2013](#), BBC, July 30, 2013
- [Microsoft Wants Google to Censor ... Microsoft.com](#), Ernesto, *TorrentFreak*, July 29, 2013
- [Backing Ban on Piracy Site Ads: Online Giants in Collaboration with the White House](#), Sanna Kulevska, July 22, 2013
- [American Bankers Association Claims Copyright in 9-Digit numbers](#), Adam Holland, July 01, 2013
- [Hollywood Studios Want Google to Censor Dotcom](#), Ernesto, *Torrent Freak*, May 28, 2013

[more](#)

Other Topics

- [ACPA](#)
- [Anticircumvention \(DMCA\)](#)
- [Chilling Effects](#)
- [Copyright](#)
- [Copyright and Fair Use](#)
- [Court Orders](#)
- [Defamation](#)
- [Derivative Works](#)
- [DMCA Safe Harbor](#)
- [DMCA Subpoenas](#)
- [Documenting Your Domain Defense](#)
- [Domain Names and Trademarks](#)
- [E-Commerce Patents](#)
- [Fan Fiction](#)
- [International](#)
- [John Doe Anonymity](#)
- [Linking](#)
- [No Action](#)
- [Patent](#)
- [Piracy or Copyright Infringement](#)
- [Protest, Parody and Criticism Sites](#)

[http://chillingeffects.org/\[REDACTED\]](http://chillingeffects.org/[REDACTED]) [8/2/2013 11:59:31 AM]

CONFIDENTIAL - FTC Docket No. 9361

**FTC-JERK0001522
CX0030-001**

Photo DMCA (Copyright) Complaint to Google -- Chilling Effects Clearinghouse

(www.jerk.com/[REDACTED].html); the person who created this profile used it without my knowledge or consent.

3. Allegedly Infringing Material:

URL of the allegedly infringing material in our search results:

(1.) http://www.jerk.com/[REDACTED].html

Sworn Statements

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law. [checked]

I swear, under penalty of perjury, that the information in the notification is accurate and that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed. [checked]

Signed on this date of:

2012-7-14

Signature

[Private]

- [Responses](#)
- [Reverse Engineering](#)
- [Right of Publicity](#)
- [Trade Secret](#)
- [Trademark](#)
- [UDRP](#)
- [Uncategorized](#)

This Topic: [DMCA Notices](#)

[Topic Frequently Asked Questions \(and Answers\)](#)

FAQ: Questions and Answers

[\[back to notice text\]](#)

Question: Why does a search engine get DMCA takedown notices for materials in its search listings?

Answer: Many copyright claimants are making complaints under the Digital Millennium Copyright Act, Section 512(d), a safe-harbor for providers of "information location tools." These safe harbors give providers immunity from liability for users' possible copyright infringement -- if they "expeditiously" remove material when they get complaints. Whether or not the provider would have been liable for infringement by users' materials it links to, the provider can avoid the possibility of a lawsuit for money damages by following the DMCA's takedown procedure when it gets a complaint. The person whose information was removed can file a counter-notification if he or she believes the complaint was erroneous.

Question: What does a service provider have to do in order to qualify for safe harbor protection?

Answer: In addition to informing its customers of its policies ([discussed above](#)), a service provider must follow the proper notice and takedown procedures ([discussed above](#)) and also meet several other requirements in order to qualify for exemption under the safe harbor provisions.

In order to facilitate the notification process in cases of infringement, ISPs which allow users to store information on their networks, such as a web hosting service, must designate an agent that will receive the notices from copyright owners that its network contains material which infringes their intellectual property rights. The service provider must then notify the Copyright Office of the agent's name and address and make that information publicly available on its web site. [512(c)(2)]

Finally, the service provider must not have knowledge that the material or activity is infringing or of the fact that the infringing material exists on its network. [512(c)(1)(A)], [512(d)(1)(A)]. If it does discover such material before being contacted by the copyright owners, it is instructed to remove, or disable access to, the material itself. [512(c)(1)(A)(iii)], [512(d)(1)(C)]. The service provider must not gain any financial benefit that is attributable to the infringing material.

[http://chillingeffects.org/\[REDACTED\]](http://chillingeffects.org/[REDACTED]) [8/2/2013 11:59:31 AM]

[512(c)(1)(B)], [512(d)(2)].

Question: What are the provisions of 17 U.S.C. Section 512(c)(3) & 512(d)(3)?

Answer: Section 512(c)(3) sets out the elements for notification under the DMCA. Subsection A (17 U.S.C. 512(c)(3)(A)) states that to be effective a notification must include: 1) a physical/electronic signature of a person authorized to act on behalf of the owner of the infringed right; 2) identification of the copyrighted works claimed to have been infringed; 3) identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed; 4) information reasonably sufficient to permit the service provider to contact the complaining party (e.g., the address, telephone number, or email address); 5) a statement that the complaining party has a good faith belief that use of the material is not authorized by the copyright owner; and 6) a statement that information in the complaint is accurate and that the complaining party is authorized to act on behalf of the copyright owner. Subsection B (17 U.S.C. 512(c)(3)(B)) states that if the complaining party does not substantially comply with these requirements the notice will not serve as actual notice for the purpose of Section 512.

Section 512(d)(3), which applies to "information location tools" such as search engines and directories, incorporates the above requirements; however, instead of the identification of the allegedly infringing material, the notification must identify the reference or link to the material claimed to be infringing.

Question: Does a service provider have to follow the safe harbor procedures?

Answer: No. An ISP may choose not to follow the DMCA takedown process, and do without the safe harbor. If it would not be liable under pre-DMCA copyright law (for example, because it is not contributorily or vicariously liable, or because there is no underlying copyright infringement), it can still raise those same defenses if it is sued.

Question: How do I file a DMCA counter-notice?

Answer: If you believe your material was removed because of mistake or misidentification, you can file a "counter notification" asking the service provider to put it back up. Chilling Effects offers a [form to build your own counter-notice](#).

For more information on the DMCA Safe Harbors, see the FAQs on [DMCA Safe Harbor](#). For more information on Copyright and defenses to copyright infringement, see [Copyright](#).

Topic maintained by [Chilling Effects](#)

[Chilling Effects Clearinghouse - www.chillingeffects.org](#)

[disclaimer](#) / [privacy](#) / [about us & contacts](#)

CX0031

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1
2 1. My name is [REDACTED] I reside in Albany, NY. The following statements
3 are within my personal knowledge and, if called as a witness, I could and would competently
4 testify thereto:

5 1. When I was on sick leave in late 2010, I did a Google search of my name and
6 found a Jerk.com link with my name on the ^{first} second page of the Google search results.

7 2. When I clicked on the Jerk.com link, I found a profile with my full name, the
8 name of my high school, a picture from Facebook, and several ads next to the profile. The
9 website allowed you to "buy" and "sell" any of my information, and the profile also contained
10 horrible statements about me, including sexual ones. No one had voted on whether I was a jerk
11 or not, but someone did vote that I was not appreciative. ~~My son later tried to help me by voting~~
12 ~~for good qualities, like that I was agreeable.~~

13 3. When I first saw the Jerk ^{low} profile, I thought that someone who knew me had put
14 me there. I work in human resources, so there are always people who are angry because they
15 weren't hired or because they were fired. I also thought that maybe some old boyfriend or
16 people I had relationships with posted this information. When I told my sister about the profile,
17 her first reaction was to ask whether I made anyone angry lately.

18 4. I also thought that maybe Jerk.com got my picture from Facebook. I am sure that
19 the profile picture was from Facebook because Facebook is the only social network I've ever
20 joined, and I have not posted that picture anywhere else. I have always set my Facebook page
21 set to "Friends only."

22 5. I immediately tried to remove my profile. I looked at Jerk's "About Us" and
23 "Remove Me" pages, but these pretty much said that Jerk would not do anything about the
24 profile. It also said that you would have to pay \$25 to remove the profile. I also contacted
25 Google and Facebook, but they told me they can't do anything about a third party's website and

to the Jerk.com Webmaster to remove the link

1 that I should go ask Jerk. For some time, I spent almost every hour of every weekend and
2 weeknight emailing Google to remove the link to ^{the} my Jerk.com profile. ~~with~~ *under my name,*

3 6. I also un-joined all Facebook groups and deleted some of my Facebook entries
4 because I thought doing that might remove the information from the Jerk profile. Eventually,
5 some of my information, like my high school, was gone from Jerk. *the site*

6 7. In May 2013, I did another Google search and the result for Jerk.com appeared on
7 the fourth page. When I clicked on the link, I got a "404" message and did not actually see my
8 profile. I do not know if Jerk ^{com} actually removed the profile, or if there was a connection issue.

9 8. This invasion of privacy by Jerk ^{com} really cut like a knife. When I first saw the
10 profile in 2010, I was on sick leave. Learning about the profile and the horrible, untrue
11 statements about me on ~~the profile~~ *made me more depressed.* I was also searching for jobs and
12 felt that my presence on the website meant I was done. I know that HR people do Google
13 searches, and I do not think any hiring person would have hired me if they saw ~~my~~ *that* profile. I was
14 also worried that my overseas family may see the profile with all that negative information. As a
15 result of Jerk, I am turned off from the Internet and use it a lot less now. *the Jerk website*

16 10. I am also angry that websites like Jerk ^{com} do not get my consent before putting me on
17 their website.

18 11. I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on December 30th, 2013, in Albany, New York.



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CX0032

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

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2 1. My name is [REDACTED] I reside in South Lyon, Michigan. The following
3 statements are within my personal knowledge and, if called as a witness I could and would
4 competently testify thereto.

5 2. In May of 2011, due to the rise in popularity of social networking sites, I
6 performed a Google search of my son's nick name and last name. At this time my son was
7 thirteen years old. The first Google search result on the list was for my son's name on
8 www.Jerk.be.

9 3. I clicked on the Google search link, and it took me to a profile web page of my
10 son's name on www.Jerk.be. At the top of the site was my son's nick name and last name.
11 Below this was a photo of my son with a "jerk" ranking. The site also contained incorrect
12 information about my son's age, address and other personal information.

13 4. I was furious that my son's photo was on this site without my or my son's
14 permission.

15 5. I speculate one of my son's Facebook friends shared their address book with
16 www.Jerk.be. I believe the developers of www.Jerk.be then created profile web pages for each
17 of the address book entries, including my son.

18 6. While looking at www.Jerk.be, I found many profiles with pictures of young
19 children.

20 7. I clicked on the "Remove Me" tab. On this page, along with the support@jerk.be
21 email address, the following was displayed:

22
23 Just because you have a profile on Jerk does not mean you are a
24 jerk. Less than 5% of the millions of people on Jerk are jerks.
25 Jerk is where you find out if someone is a jerk, is not a jerk, or is a
26 saint in the eyes of others. No one's profile is ever removed
27 because Jerk is based on searching free open internet searching
28 databases and it is not possible to remove things from the Internet!.
You can however use Jerk to manage your reputation and resolve
disputes With people who you are in conflict with. There are also
additional paid premium features that are available
<http://www.jerkcomisignin.php>

1 8. On May 8, 2011, I sent an email to support@jerk.be demanding the removal of
2 my son from the www.Jerk.be website. A true and correct copy of this email with my son's nick
3 name redacted is attached as [REDACTED] Attachment A.

4 9. On May 9, 2011, I returned to the www.Jerk.be website and my son's photo and
5 the incorrect personal information had been removed, but his name was still there. A true and
6 correct copy of the current Google search results and jerk profile with my son's nick name and
7 images redacted is attached as [REDACTED] Attachment B.

8 10. Based on my research of www.Jerk.be, I found that www.Jerk.be's first web
9 address was www.Jerk.com and then changed to www.Jerk.be. On or about November 2011,
10 www.Jerk.be changed back to www.Jerk.com.

11 11. On May 10, 2011, I filed a complaint against Jerk LLC with the Internet Crime
12 Complaint Center. A true and correct copy of my complaint, with my personal information
13 redacted, is attached as [REDACTED] Attachment C.

14 12. I declare under penalty of perjury that the foregoing is true and correct. Executed
15 on 05/15, 2012, in Michigan.

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[REDACTED]

CX0033

MARKED CONFIDENTIAL

From: [REDACTED] Redacted
To: "support@jerk.be" <support@jerk.be>
Sent: Sunday, May 8, 2011 5:15 PM
Subject: remove [REDACTED]

Remove [REDACTED] off your website **immediately**- he is a child. I am his parent.

I will contact the authorities in 2 days of this note if he still appears on your webpage.

Thank you.

CX0034

MARKED CONFIDENTIAL

+You Search Images Maps Play YouTube News Gmail Documents Calendar More

Google



Sign in

Search

About 18 results (0.22 seconds)

Web

Jerk [redacted] is not a jerk

Images

[redacted] profile. Find out if [redacted] is a jerk or not!

Maps

South Lyon East Track - my.hsj.org - My High School Journalism ...

Videos

[redacted] Schools/Newspaper/ /South_Lyon_East_Track.asia

News

Apr 30, 2012 - Freshmen [redacted]

Shopping

[redacted] on Twitter

More

Twitter.com [redacted] Full name, Email, Password, Tweets, Following, Followers, Favorites, Lists, Recent Images, © 2012 Twitter, About, Help, Terms ...

Washington, DC
Change location

Men's All Time Top Ten - East Track and Field

Show search tools

IP [redacted] Contributions

Www.answers.com/Q/Special/Contributions&target=ip [redacted]
Jul 3, 2010 - Asked What is [redacted] said it was the same as What is ...
Wrote the first answer to How much does [redacted] 18 Apr 2010 16:57 ...

[redacted] Highlight Videos, Schedule & Roster - Hudl

[redacted] athletic and academic accomplishments.

Images for [redacted] Report images

Www.facebook.com/page/[redacted]
[redacted] 10 likes · 1 talking about this. ... [redacted] is on Facebook. To connect with
[redacted] sign up for Facebook today. Sign Up Log In · Like · Create a Page · Privacy ...

[redacted] best tweets

Favstar.fm - @ [redacted] [redacted] best tweets.

[redacted] twitter Account [redacted] is worth \$0.75 ...

The [redacted] twitter account from South Carolina is following 6 people, is being followed by 41 people, has been listed 7 times, has sent out 25 tweets, ...

[redacted] The Profile Engine

Google >

1 2 3 4 Next

Advanced search Search Help Give us feedback

Google Home Advertising Programs Business Solutions Privacy & Terms
About Google

Attachment B - 1

Jerk : [REDACTED] is not a jerk

http://www.jerk.com/[REDACTED].html

The screenshot shows the Jerk website interface. At the top right, it says "Get Our News, Everywhere!" with social media icons for +1, Tweet, Follow, and Email. The main navigation bar includes "POST A JERK", "REMOVE", "SCHOOLS", "CITIES", "more", and "sign in". A search bar is present with the text "Find a Person, an University, or a City" and a search icon. Below the navigation, there are sections for "Online About Character" and a "REDACTED" area. A sidebar on the left contains various options like "Multimedia gallery", "Nominate this person for Jerk of the day", and "Claim this profile". At the bottom, there is a footer with copyright information: "© 2012 Jerk | Contact | Terms & Conditions | Copyright Information | Sign up Now".

[REDACTED] Attachment B - 2

CX0035

MARKED CONFIDENTIAL

Record # 234 / Consumer Sentinel Network Complaints			
Reference Number:	[REDACTED]	Originator Reference Number:	[REDACTED]
Language:	English	Contact Type:	Complaint
Source:	Organization	DNC?	N
Comments:	NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: jerk.be website is posting children profiles that are under age 14 w/o permission. this is opened ended software that anyone then can go in and edit- w/o sign in or membership- including pictures and remarks. while doing a google search on my child, this website was found with my sons picture. i contact their support via email at support@jerk.be and asked for him to be removed- they only removed his picture- the profile is still there. query [REDACTED] he is only 13- i notice there are lot of children photos/profiles on this website. — Specified Other Payment: time and energy wasted A Romanian software developing company created the website, and it looks like the partner for the project is John W. Fanning, Founding Chairman and CEO, Napster, CTO, Netcapital. ASSIST Software SRL Osf Global http://www.assist-software.ro/jerk		
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	Entry Date:	5/10/2011
Updated By:		Updated Date:	
Complaint Source:	Internet Crime Complaint Center	Product Service Code:	Other (Note in Comments)
Amount Requested:		Amount Paid:	\$100,000.00
Payment Method:	Other Payment Method (Note in Comments)	Agency Contact:	External Agency
Complaint Date:	5/10/2011	Transaction Date:	
Initial Contact:	Internet Web Site	Initial Response:	
Statute/Rule:		Law Violation:	
Topic:		Dispute with Credit Bureau?:	
Dispute with Credit Bureau - Responded?:		Dispute with Credit Bureau - Resolved to Satisfaction?:	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:		Last Name:	[REDACTED]
First Name:	[REDACTED]	Address 2:	[REDACTED]
Address 1:	[REDACTED]	State:	Michigan
City:	[REDACTED]	Country:	UNITED STATES
Zip:	[REDACTED]	Work Number:	[REDACTED]
Home Number:	[REDACTED]	Ext:	[REDACTED]
Fax Number:	[REDACTED]	Age Range:	[REDACTED]
Email:	[REDACTED]	Soldier Status:	[REDACTED]
Military Service Branch:	[REDACTED]		
Soldier Station:	[REDACTED]		
Subject			
Subject:	2011 Jerk Llc		
Address:		State/Prov:	Arizona
City:		Country:	United States
ZIP:		URL:	www.jerk.be
Email:		Phone Number:	
Area Code:			
Ext:			

https://www.consumersentinel.gov/_layouts/PrintRecordDetails.aspx?documentNumbers=... 5/25/2012
 [REDACTED] Attachment C - 1

Representative Name:	Title:	
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https://www.consumersentinel.gov/_layouts/PrintRecordDetails.aspx?documentNumbers=... 5/25/2012
Attachment C - 2

CX0036

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1
2 1. My name is [REDACTED], and I declare as follows:

3 2. After doing a Google search on my name around winter 2011, I discovered a
4 profile of me on Jerk.com as one of the top Google hits under my full name. I had never heard
5 of Jerk.com before this search.

6 3. When I clicked on the link to Jerk.com from my Google search, I found a profile
7 with my name and a photo of me with my husband and my two infant children. My children
8 were about two and half years old and four months old in that picture. The profile had no other
9 information about me or my family, other than some polls where people could vote if I was a
10 "Jerk" or not, but no one had voted. Initially, I was worried that someone had created the
11 Jerk.com profile against me. I was mortified and embarrassed that my name and the photo of me
12 with my children were on this website.

13 4. I recognized that photo because it was the same one I had uploaded to my
14 Facebook profile in the past. The photo used on the Jerk.com profile was clearly taken from my
15 Facebook page even though my Facebook privacy settings were set so that my profile was only
16 accessible to people I had accepted as friends. I have always been very careful about my
17 Facebook privacy settings and made sure that only friends could see my profile. Not even
18 friends of friends were allowed to see my profile. But Jerk.com is a public website where
19 anyone could see the picture of me and my children. I did not authorize anyone to post my
20 information on Jerk.com and do not know how my Facebook photo appeared on this website. I
21 never saw or downloaded an application on Facebook relating to Jerk.

22 5. After discovering this Jerk.com profile, I immediately tried everything I could
23 think of to remove my name and photo. I went through the Jerk.com website and tried several
24 different ways to contact them, including calling the number they provided on the website,
25 emailing them, and even writing them a letter. I was unable to reach anyone at Jerk.com about
26 the profile, and they never responded to my numerous attempts to contact them.

27 6. While on searching Jerk.com for a way to remove my name and photo, I noticed
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DECLARATION OF [REDACTED]

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1 that the company suggests that people pay to have their profiles removed. This looked like some
2 sort of paid membership to access to profile information. They were asking for \$30 just to talk
3 to someone. I did some research online and found that many other people had similar complaints
4 to mine, and the people who had paid Jerk never actually got their information removed. My
5 husband and I agreed not to pay for a membership with Jerk.com because we felt that this
6 company was just trying to solicit people for money to get their names and photos off its website.


7 7. After my attempts to contact Jerk.com were unsuccessful, I sent also complaints
8 to various groups, including the Federal Trade Commission. I just wanted my children's photo
9 off that website.

10 8. Since first finding the Jerk.com profile, I have searched for it a few other times.
11 Several months ago, I searched my name on Google to see if the Jerk.com result was still there,
12 and it was. Then later this year, I did another Google search and did not see any hits for
13 Jerk.com with my name. I do not know if Jerk.com actually removed the profile about me, or if
14 it just did not show up in the Google search.

15 9. I have spent around 20 hours trying to remove the Jerk.com profile, but Jerk never
16 did anything to respond to my concerns or help me remove my profile. I am worried about this
17 because the Jerk.com profile could harm my ability to return to my job as a social worker if
18 people search me and the search results show a Jerk.com entry. But mostly I am worried about
19 this as a mother. I am very upset that my infant children's photograph was used on this website
20 without my consent or knowledge, and that Jerk.com would take no action to remove this photo
21 and profile—other than by soliciting money from my family to get a paid Jerk.com membership.

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23 I declare under penalty of perjury that the foregoing is true and correct.

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25 Executed on August 8th, 2013, in Franklin Square, New York.

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DECLARATION OF 

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CX0037

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

1
2 1. My name is [REDACTED]. I reside in Easton, Connecticut. The
3 following statements are within my personal knowledge and, if called as a witness, I could and
4 would competently testify thereto.

5 2. I have a Google alert set for my name, and one day, I received a Google alert with
6 my name in a link to jerk.com. The search result was within the first few pages.

7 3. When I visited jerk.com, I saw a profile with my full name and a photograph of
8 me as a child. I immediately thought that someone who didn't like me put me on there. The
9 website bragged about success stories of posting and rating "jerks," and these stories were like
10 ads encouraging people to post and rate more people. I was alarmed. I thought that someone
11 was messing with me.

12 4. I then noticed that the photo of me was a Facebook profile picture. I started
13 thinking that someone may have scraped the picture from Facebook. I have had a Facebook
14 account since 2005 and always use the highest privacy settings possible. But since Facebook
15 profile pictures are always public, there was no setting to hide that profile picture.

16 5. I felt that jerk.com was some sort of extortion scheme. The site was very cocky
17 about how it had the right to use photos from the Internet. There was also no way to get in
18 touch. You had to pay something to have them read your email. I contacted jerk.com's domain
19 registrant, but it told me that I contacted the wrong party.

20 6. In February 2011, I contacted Facebook alerting them to the scraping of Facebook
21 profile photos by jerk.com. A few days later, I received a message back informing me that
22 Facebook could not control the actions of third parties and suggested that I contact jerk.com
23 directly to request removal of my profile.

24 7. My experience with jerk.com was time consuming and nerve-wracking. I spent at
25 least 30 or more hours researching how to request takedowns. It bothered me that the website

1 encouraged others to post stuff about me. It also scared me that someone could search my name
2 and see this result pop up, causing harm to my personal and professional reputation.

3 8. I declare under penalty of perjury that the foregoing is true and correct.

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5 Executed on 11/29/13, 2013, in Easton, Connecticut.



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CX0038

MARKED CONFIDENTIAL

DECLARATION OF [REDACTED]

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2 1. My name is [REDACTED]. I am a contractor in San Francisco, CA. The
3 following statements are within my personal knowledge and, if called as a witness, I could and
4 would competently testify thereto.

5 2. In February 2012, I was searching the Internet and typed my name into the
6 Google search engine. One of the top search results was a website called jerk.com. I clicked on
7 the link to jerk.com and discovered a profile containing my name and defamatory information.
8 I did not authorize jerk.com to create a profile about me. I believe a customer who allegedly
9 committed fraud against me and 15 other contractors posted the inaccurate information about me
10 on jerk.com to discourage our collection efforts.

11 3. I was concerned that potential clients who searched my name on Google
12 would see my jerk.com profile and I wanted the defamatory remarks removed. I recall there was
13 a link at the top of the website that said "Remove Me." I clicked on the "Remove Me" link and a
14 message appeared saying nothing on jerk.com could be removed.

15 4. I continued to search for ways to remove my jerk.com profile. I did not see any
16 way to contact the owners of the website. I read a statement on jerk.com that indicated I could
17 remove information from my profile by joining jerk.com. My impression from the membership
18 description on jerk.com was that I would receive a password that would enable me to delete
19 content on my profile. Although I did not want to support jerk.com and the website's
20 extortionate practices, I was concerned about my business reputation so I paid jerk.com \$30 for
21 an annual membership. After I paid the fee, nothing changed. I did not receive special access to
22 my jerk.com profile. I checked my email folders, including my spam folders, but did not receive
23 a password for my jerk.com membership. I checked my bank statement and confirmed that
24 jerk.com withdrew \$30 from my account. The membership was a complete waste.
25



1 5. As of today, my profile is still visible on jerk.com and I have not received a
2 password to activate my jerk.com membership. I believe the inaccurate comments about my on
3 jerk.com have negatively affected my business.

4 6. I declare under penalty of perjury that the foregoing is true and correct.
5 Executed on October 17, 2012, in San Francisco.



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CX0039

MARKED CONFIDENTIAL

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8. I declare under penalty of perjury that the foregoing is true and correct. Executed on 10/25, 2012, in North Carolina.



CX0040

MARKED CONFIDENTIAL

1 work on the third try.

2 7. I wanted to make a complaint to the website, but it requested a \$25.00
3 charge for contacting customer service, which I did not want to do after paying
4 \$90.00 to no avail. There was no easy way to contact anyone associated with the
5 website. I filed complaints with Google and the Internet Crime Complaint Center in
6 2012.

7 8. To this day, my daughter's profile is still on jerk.com. It is absolutely
8 the cruelest form of bullying and it has devastated my daughter. She has had to go
9 to therapy because of this experience, and she feels invaded and abused. She is
10 suffering from situational depression because of this website.

11 9. I declare under penalty of perjury that the foregoing is true and correct.
12 Executed on Oct 11, 2012 2012, in Massachusetts.



CX0042

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0044

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

CX0047

MARKED CONFIDENTIAL

1 other associated files from the original web page. Attached as Kauffman Attachment A is a true
2 and correct copy of the website www.jerk.com as captured on May 1, 2012, using Adobe
3 software.

4 5. On May 1, 2012, I used the software program Camtasia to record a real-time
5 video of the images on my computer screen. I accessed the website www.jerk.com and clicked
6 on various links on the website, including "Post a Jerk," "Remove Me," "Track People," "Am I a
7 Jerk," and "School." I immediately saved the Camtasia video on my computer as a Windows
8 Media file. On August 31, 2012, I burned the video to the DVD accompanying this declaration.
9 A true and correct copy of the video I created on May 1, 2012 of the website www.jerk.com is
10 saved as Kauffman Attachment B on the DVD lodged with this declaration.

11 III. SUBSCRIPTION

12 A. Creation of Undercover Accounts

13 6. On May 9, 2012, I accessed the website www.hotmail.com and created a free
14 hotmail email account, valdictorian@hotmail.com, for a fictitious consumer named Val
15 Dictorian. I am the only person with the password to this hotmail account. I have not deleted or
16 modified any messages sent to this hotmail account.

17 7. On May 11, 2012, I accessed the website www.jerk.com and created a user
18 profile for Val Dictorian. Val Dictorian is the only profile I created on Jerk.

19 8. As part of my duties as an investigator, I have access to an undercover credit card
20 that FTC staff use for investigations. I made all the purchases described in this declaration with
21 the undercover credit card.

22 B. Purchase of \$30 Membership to Jerk

23 9. On May 16, 2012, I accessed the website www.jerk.com and clicked on the link
24 titled "Track People" and then on the link titled "LOG IN." When I clicked on "LOG IN," I was
25 directed to a page that stated:

26 "Welcome to Jerk. Looking for the latest scoop on a world filled with Jerks?
27 Want to join millions of people who already use Jerk for important updates for
28 business, dating, and more? Don't worry we have room for one more!

1 Subscribers on Jerk yourself [sic] and receive free benefits including:

- 2 1. Fast notifications of postings about you!
- 3 2. Updates on people you know and are tracking.
- 4 3. Search for people you know, and read about people you are interested in.
- 5 4. Enter comments and reviews for people you interact with.
- 6 5. Help others avoid the wrong people.
- 7 6. Praise those who help you and move good people closer to sainthood!"

8 10. The page also contained a button titled "Subscribe" directly below the description
9 of Jerk's membership features. I clicked on the "Subscribe" button and was directed to an online
10 form titled "Billing Information." The top of the form stated, "Become a Subscriber . . . You
11 must be a subscriber member in order to create a dispute!" The billing form requested my
12 personal information, including my name, address, email address, and phone number. The
13 bottom of the form contained a field where I could choose between a "Gold Membership," which
14 was "(under development)," or a "standard membership for \$30 / year."

15 11. Using the Val Dictorian profile I had created, I entered the required information
16 on the Jerk subscriber form, including the email address, valdictorian@hotmail.com. I selected
17 the \$30 standard membership and entered payment information for the FTC undercover credit
18 card. After I paid \$30, a message appeared on screen stating: "Your existing account,
19 valdictorian@hotmail.com, has been upgraded to standard membership. Please relog on jerk, to
20 use all the features."

21 12. I next logged into the email account for valdictorian@hotmail.com and checked
22 all the mail folders, including the spam folder. The account did not contain any messages from
23 Jerk or from any other entity regarding my Jerk subscription.

24 13. I returned to www.jerk.com and clicked on the "sign in" link at the top of the
25 webpage. A prompt appeared requesting an email address and password. I entered the email
26 address valdictorian@hotmail.com and clicked on the link "forgot password." I was directed to
27 another page that requested my email address. I entered the email address
28 valdictorian@hotmail.com and clicked on the button titled "email my password."

1 information for the FTC undercover credit card into the payment form and clicked the "submit"
2 button. After I made the payment, the following message appeared on my screen: "Your
3 payment was successful. The administrator will receive your message!"

4 19. On May 11, 2012, I used the software program Camtasia to record a real-time
5 video of the images on my computer screen. I immediately saved the Camtasia video on my
6 computer as an avi file. On August 31, 2012, I burned the video to a DVD. A true and correct
7 copy of the video I created showing my payment of a \$25 customer support fee to Jerk is saved
8 as Kauffman Attachment F on the DVD lodged with this declaration.

9 20. On May 11, 2012, I completed the "Contact Us" form on Jerk for a second time.
10 I entered information for the FTC credit card and again requested that Jerk remove the profile
11 containing the photo of Ms. [REDACTED] child.

12 21. In early June 2012, I received a statement for the FTC credit card I used to pay for
13 the \$25 customer support fees to Jerk. The statement showed that "JERK LLC JERK.COM
14 MA" posted two \$25 charges to the credit card on May 14, 2012. A true and correct copy of the
15 credit card statement, with sensitive information about other investigations redacted, is attached
16 as Kauffman Attachment G.

17
18 I hereby declare under penalty of perjury that the foregoing is true and correct. Executed
19 at San Francisco, California, on August 31, 2012.

20
21
22 

23 Craig Kauffman
24
25
26
27
28

CX0048

MARKED CONFIDENTIAL

Jerk

[POST A JERK](#)

[REMOVE ME](#)

[SCHOOLS](#)

[CITIES](#)

[more](#) v

[sign in](#)

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+ share a news story

+ report your story

The Homewrecker

is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of.

1 0

votes: 1539/49
[Jerk](#) [Not Jerk](#)

Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By

I'll Make 250K This Year, While You're Unemployed LOL': Monster.com Recruiting Goes Horribly Wrong

A man we'll call has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas."

3 1

votes: 11/1
[Jerk](#) [Not Jerk](#)

votes: 13/1
[Jerk](#) [Not Jerk](#)

votes: 15/3
[Jerk](#) [Not Jerk](#)

[view more](#)

has often been described as a computer "expert" and has demonstrated above-

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke l

2 2

votes: 13/1
[Jerk](#) [Not Jerk](#)

votes: 12/1
[Jerk](#) [Not Jerk](#)

Bohemian Rhapsody

see why
as jerked 21 times today. What do you think yourself?

see why
13 people moved to sainthood today. What do you think yourself?

How to Stop Your Divorce.
There are 7 Secrets. Get them Free. "I suggest you read this..."
[www.MarriageMax.com/Free-Help](#)

Work at Home - Start Here
2012 Top Work From Home Job Exposed Apply Today, Get Hired Tomorrow!
[consumersalerts.com](#)

Work From Home \$629/day
Make \$47/hr Working From Home Unlimited Potential. Hiring Now!
[fortunemarket.com](#)

Save Your Marriage
How To Communicate With Your Spouse When You Fear It's Too Late.
[HowBooks.com/Save-Your-Marriage](#) [AdChoices](#)

top 10 Jerks of 2011 **2012**

- see why
votes: 3043/69748
- see why
votes: 368/15090
- see why
votes: 70/9337
- see why
votes: 5791/91
- see why
votes: 7065/6740
- see why
votes: 5045/12
- see why
votes: 4094/20
- see why
votes: 5/3513
- see why
votes: 22/3116

[UPDATE]
An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball. [redacted] stands by [redacted] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags.
[read more](#)

average knowledge regarding computers, the use of the Internet, and security awareness. [redacted] has the ability to integrate [redacted] into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [redacted] may advertise online as a tutor or male nanny. [redacted] attended Cornell University for a year.
[read more](#)

of existence:
One of the obstacles to wider acceptance of opera is that they ask us to believe in characters who, in moments of high emotion, burst into song. Your average smirking 17-year-old is likely to burst into a heartfelt "as if." Average smirking 17-year-old, meet [redacted].
[re](#)

see why
votes: 16808/930

1 0

0 2

votes: 6/10
Jerk Not Jerk

votes: 22/1
Jerk Not Jerk

votes: 5/19
Jerk Not Jerk

votes: 0/2
Jerk Not Jerk

votes: 0/2
Jerk Not Jerk

view more

view more news

top 100 Jerks Saints of the week

#1
see why
votes this week: 396

#2
see why
votes this week: 132

#3
see why
votes this week: 52

#4
see why
votes this week: 41

#5
see why
votes this week: 40

#6
see why
votes this week: 37

#7

#8

#9

Kauffman Attachment A-2

The image shows a grid of six redacted items, likely from a social media or news site. Each item is a square with a blacked-out top half and a bottom half containing text. The items are arranged in two rows of three. The top row items have the following text at the bottom: 'votes this week: 36', 'votes this week: 30', and 'votes this week: 25'. The middle item in the top row has a 'see why' link. The bottom row items have the following text at the bottom: 'votes this week: 21', 'votes this week: 20', and 'votes this week: 15'. The middle item in the bottom row has a 'see why' link. A 'view 12 more' link is centered below the grid. At the bottom left, there is a footer: '© 2012 Jerk | Contact | Terms & Conditions | Copyright Information | Sign up Now'.

Kauffman Attachment A-3

FTC-JERK0046426
CX0048-003

Jerk :: [redacted] is a jerk

Jerk [POST A JERK](#) [REMOVE ME](#) [SCHOOLS](#) [CITIES](#) [more](#) [sign in](#)

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[Online](#) [About](#) [Character](#)

Facebook
[www.facebook.com/people/\[redacted\]](#)
 [redacted] is on Facebook. Join Facebook to connect with [redacted] and others you may know. Facebook gives people the power to share and makes the world more ...

on Myspace
[www.myspace.com/\[redacted\]](#)
 [redacted] profile on Myspace, the leading social entertainment destination powered by the passion of our fans.

Jerk :: [redacted] is a jerk
[www.jerk.com/\[redacted\]](#) [limit](#)
 [redacted] profile. Find out if [redacted] is a jerk or not!

Email Address, Phone numbers, everything! www ...
[www.123people.com/\[redacted\]](#)
 Everything you need to know about [redacted] Email addresses, Phone numbers, Biography, Filed [redacted]

Bronx, NY | MyLife™
[www.mylife.com/c/\[redacted\]](#)
 Locating people like [redacted] is quick and easy with the advanced people search features of MyLife™

votes: **1639/49**

[Jerk](#) [not a Jerk](#)

Multimedia gallery
 Nominate this person for Jerk of the day [view more](#)
 Claim this profile

age:

address: [buy / sell](#)
 city: **Bronx** [change](#)
 zip code: [buy / sell](#)
 country: **New York**

mobile: [buy / sell](#)
 main: [buy / sell](#)
 emails: [Add](#)

occupation:

universities: **Ball State University**
[Add](#)

employer: [buy / sell](#)
 home phone: [buy / sell](#)
 work phone: [buy / sell](#)
 license plate: [buy / sell](#)

myspace: [buy / sell](#)
 ebay: [buy / sell](#)
 linked in: [buy / sell](#)

reports

[+ post a report](#)

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Kauffman Attachment A-4

Jerk

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[REMOVE ME](#)

[SCHOOLS](#)

[CITIES](#)

[more](#) ▾

[sign in](#)

Find a Person, an University, or a City

search 

[REDACTED]: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1   0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0

Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1   0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0


I'll Make 250K This Year, While You're Unemployed LOL! Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3   1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-5

FBI WANTED - [REDACTED]

Post a comment...

Post

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness. [REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.



[REDACTED] attended Cornell University for a year and transferred to Purdue University, where he graduated with a degree in education. Since June of 2008, [REDACTED] is believed to have traveled to Virginia, Illinois, Indiana, Wisconsin and Minnesota. [REDACTED] is believed to have lived in Arizona in 2009.

CAUTION

[REDACTED] a former private-school teacher, is wanted for allegedly possessing child pornography in Washington, DC. It is alleged that in June of 2008, pornographic images were found on a school camera that had been in [REDACTED] possession. [REDACTED] also allegedly produced child pornography in Maryland.

REWARD

The FBI is offering a reward of up to \$100,000 for information leading directly to the arrest of [REDACTED]. [Read full article](#)

0 2

Posted 3 weeks ago

Reporter: [REDACTED]

Views: 66

Comments: 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment...

Post

[REDACTED] report: Safety [REDACTED] lane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [Read full article](#)



2 2

Posted 3 weeks ago

Reporter: [REDACTED]

Views: 97

Comments: 0

<<Previous 1 2 3 4 5 6 7 8 9 10 11 12 13 Next>>

Kauffman Attachment A-6

FTC-JERK0046429
CX0048-006

Jerk

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[CITIES](#)

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[REDACTED] :: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1   0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0



Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1   0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0

I'll Make 250K This Year, While You're Unemployed LOL! Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3   1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-7

FBI WANTED - [REDACTED]

Post a comment...

Post

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness. [REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.



[REDACTED] attended Cornell University for a year and transferred to Purdue University, where he graduated with a degree in education. Since June of 2008, [REDACTED] is believed to have traveled to Virginia, Illinois, Indiana, Wisconsin and Minnesota. Toth is believed to have lived in Arizona in 2009.

CAUTION

[REDACTED] a former private-school teacher, is wanted for allegedly possessing child pornography in Washington, DC. It is alleged that in June of 2008, pornographic images were found on a school camera that had been in [REDACTED] possession. [REDACTED] also allegedly produced child pornography in Maryland.

REWARD

The FBI is offering a reward of up to \$100,000 for information leading directly to the arrest of [REDACTED] [...] [Read full article](#)

0 2 **Posted** 3 weeks ago **Reporter:** [REDACTED] **Views:** 66 **Comments:** 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment...

Post

[REDACTED] report: Safety experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [...] [Read full article](#)



2 2 **Posted** 3 weeks ago **Reporter:** [REDACTED] **Views:** 97 **Comments:** 0

<<Previous 1 2 3 4 5 6 7 8 9 10 11 12 13 Next>>

Kauffman Attachment A-8

FTC-JERK0046431
CX0048-008

Jerk :: [redacted] is a jerk

Jerk

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[Online](#) [About](#) [Character](#)

[Hot Chip - Wikipedia](#) [see encyclopedia](#)
[en.wikipedia.org/wiki/Hot_Chip](#)
Hot Chip are a electronic indie band. They have released four studio albums—Coming on Strong, The Warning, Made in the Dark and One Life Stand. Hot Chip formed in ...

[\[redacted\] Character Animator :: News](#)
... I am a character animator recently graduated from The Savannah College of Art & Design with an MFA in Animation, pending the ...

[\[redacted\] on SoundCloud - Create ...](#)
[soundcloud.com/\[redacted\]](#)
... record and share the sounds you create anywhere to friends, family and the world with soundcloud, the world's ...

[\[redacted\] - Free listening, videos, concerts, stats ...](#)
[www.last.fm/music/\[redacted\]](#)
... & more, plus 5 pictures [\[redacted\]](#) (aka [\[redacted\]](#)), has been a somewhat inescapable ...

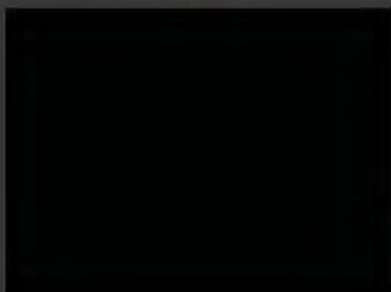
[\[redacted\] by Baseball Almanac](#)
[www.baseball-almanac.com/\[redacted\]](#)
... fielding stats, along with uniform numbers, salaries, quotes, career stats and biographical data ...

reports

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[view more](#)

[redacted] is a Jerk



votes: 11/1

[Jerk](#)

[not a Jerk](#)

[Multimedia gallery](#)

[Nominate this person for Jerk of the day](#)

[Claim this profile](#)

age: [buy / sell](#)

address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

mail: [buy / sell](#)

emails: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

licence plate: [buy / sell](#)

myspace: [buy / sell](#)

ebay: [buy / sell](#)

linked in: [buy / sell](#)

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Double Dutch
is a Jerk

Find a Person, an University or a City

search 🔍

[Online](#) [About](#) [Character](#)

Double Dutch (jump rope) - Wikipedia, the free encyclopedia

[en.wikipedia.org/wiki/Double_Dutch_\(jump_rope\)](http://en.wikipedia.org/wiki/Double_Dutch_(jump_rope))

Double dutch is a game in which two long jump ropes turning in opposite directions are jumped by one or more players jumping simultaneously. Double dutch began in the ...

Double Dutch

www.thedoubledutch.com

National Double Dutch League

www.nationaldoubledutchleague.com

Official site of the National Double Dutch League. History of the sport, official ropes, rules, supplies, information on training programs and the National Exhibition ...

Double Dutch History

www.nationaldoubledutchleague.com/history.htm

Basically, Double Dutch is a rope skipping exercise played when two ropes are turned in eggbeater-fashion. While the ropes are turned, a third ...

doubledutch Boutique

www.doubledutchboutique.com

Searching... Please Wait ... Bottoms •Dresses •Outerwear •Tops

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+ post a report

view more



votes: 13/1

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: [buy / sell](#)

address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

mail: [buy / sell](#)

email: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

license plate: [buy / sell](#)

myspace: [buy / sell](#)

reddit: [buy / sell](#)

linked in: [buy / sell](#)

Jerk

[POST A JERK](#)
[REMOVE ME](#)
[SCHOOLS](#)
[CITIES](#)
[more >](#)
[sign in](#)

search

Online
About
Character

[redacted] - Wikipedia, the free encyclopedia

[en.wikipedia.org/wiki/\[redacted\]](#) is the [redacted] musician [redacted] (1994) and [redacted] [redacted] was ...

[redacted] daughter [redacted] poses for [redacted]

[www.onthetreadcarpet.com](#) the [redacted] posed for famed designer-turned-photographer [redacted]

[redacted], Glams Up for New ...

[www.people.com/people/article](#) With her soft, wistful expression and Old Hollywood glamour, [redacted] style is about as far as she can get from that of her parents, the late ...

[redacted]: Fashion's timely muse - Entertainment ...

[today.msnbc.msn.com/id](#) It was bound to happen: her DNA demanded it. [redacted], who turned 19 on Aug. 18, has traversed the path of other rock star progeny to become a bona fide ...

[redacted] Boyfriend, Report Says ...

[www.foxnews.com](#) [redacted] in 2007, and mom and dad [redacted] in 1994 Reuters. The 19-year-old, who uses a monkey on her Facebook ...

votes: 15/3

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: [buy / sell](#)

address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

msn: [buy / sell](#)

emails: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

license plate: [buy / sell](#)

myspace: [buy / sell](#)

ahoy: [buy / sell](#)

linked in: [buy / sell](#)

reports

+ post a report

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Kauffman Attachment A-11

Jerk

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[SCHOOLS](#)

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search 🔍

[REDACTED] :: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1 0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0

Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1 0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0

I'll Make 250K This Year, While You're Unemployed LOL! Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3 1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-12

FBI WANTED - [REDACTED]

Post a comment...

Post

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness. [REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.



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CAUTION

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REWARD

The FBI is offering a reward of up to \$100,000 for information leading directly to the arrest of [REDACTED]. [...] [Read full article](#)

0 2 **Posted** 3 weeks ago **Reporter:** [REDACTED] **Views:** 66 **Comments:** 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment...

Post

[REDACTED] report: Safety experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [...] [Read full article](#)



2 2 **Posted** 3 weeks ago **Reporter:** [REDACTED] **Views:** 97 **Comments:** 0

<<Previous 1 2 3 4 5 6 7 8 9 10 11 12 13 Next>>

Kauffman Attachment A-13

FTC-JERK0046436
CX0048-013

Jerk

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[REDACTED] :: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1   0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0

Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1   0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0

I'll Make 250K This Year, While You're Unemployed LOL': Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3   1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-14

FBI WANTED - [REDACTED]

Post a comment...

Post

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness. [REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.



[REDACTED] attended Cornell University for a year and transferred to Purdue University, where he graduated with a degree in education. Since June of 2008, [REDACTED] is believed to have traveled to Virginia, Illinois, Indiana, Wisconsin and Minnesota. [REDACTED] is believed to have lived in Arizona in 2009.

CAUTION

[REDACTED], a former private-school teacher, is wanted for allegedly possessing child pornography in Washington, DC. It is alleged that in June of 2008, pornographic images were found on a school camera that had been in [REDACTED] possession. [REDACTED] also allegedly produced child pornography in Maryland.

REWARD

The FBI is offering a reward of up to \$100,000 for information leading directly to the arrest of [REDACTED]. [...] [Read full article](#)

0 2

Posted 3 weeks ago

Reporter: [REDACTED]

Views: 66

Comments: 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment...

Post

[REDACTED] report: Safety experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [...] [Read full article](#)



2 2

Posted 3 weeks ago

Reporter: [REDACTED]

Views: 97

Comments: 0

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Kauffman Attachment A-15

FTC-JERK0046438
CX0048-015

Jerk :: [redacted] is a jerk

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[\[redacted\]](#) | LinkedIn
[www.linkedin.com/pub/\[redacted\]](#)
 View [\[redacted\]](#) professional profile on LinkedIn [\[redacted\]](#) -TV Location
 Houston, Texas Area Industry Broadcast Media Join ...

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[www.linkedin.com/pub/\[redacted\]](#)
[\[redacted\]](#) at U.S. Department of Justice Office of the Inspector General Location Washington
 D.C. Metro Area ...

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 informed on the latest financial security news ...

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[\[redacted\]](#) is on Facebook. Join Facebook to connect with [\[redacted\]](#) and others you may know. Facebook
 gives people the power to share and makes the world ...

[\[redacted\]](#) | School of Journalism
[journalism.missouri.edu/aj](#)
 The Official Website for the School of Journalism at the University of Missouri.

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votes: 13/1

[Jerk](#) [not a Jerk](#)

Multimedia gallery
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age: [buy / sell](#)
 address: [buy / sell](#)
 city: [East London \[change\]](#)
 zip code: [buy / sell](#)
 country: [South Africa](#)

mobile: [buy / sell](#)
 msn: [buy / sell](#)
 email: [Add](#)

occupation: [buy / sell](#)
 universities: [Add](#)
 employer: [buy / sell](#)
 home phone: [buy / sell](#)
 work phone: [buy / sell](#)
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myspace: [buy / sell](#)
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Kauffman Attachment A-16

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encyclopedia

was an American journalist, game show host, actor and media personality. He interviewed a wide range of ...

Steelers at NFL.com

ial Team Site. Height [redacted] eight [redacted] Age: 25 Born [redacted]

ikipedia, the free encyclopedia

(football)

New Orleans, Louisiana) is an [redacted]

ews, Rumors, Scores ...

profile pages at CBSSports.com.

S

Steelers

reports

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votes: 12/1

Jerk

not a Jerk

Multimedia gallery

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address: [buy](#) / [sell](#)

city: [Choose](#)

zip code: [buy](#) / [sell](#)

country:

mobile: [buy](#) / [sell](#)

msn: [buy](#) / [sell](#)

emails: [Add](#)

occupation: [buy](#) / [sell](#)

universities: [Add](#)

employer: [buy](#) / [sell](#)

home phone: [buy](#) / [sell](#)

work phone: [buy](#) / [sell](#)

license plate: [buy](#) / [sell](#)

misspelt: [buy](#) / [sell](#)

also: [buy](#) / [sell](#)

linked in: [buy](#) / [sell](#)

Kauffman Attachment A-17

FTC-JERK0046440

CX0048-017

Jerk

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[SCHOOLS](#)

[CITIES](#)

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[REDACTED] :: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1   0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0


Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1   0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0

I'll Make 250K This Year, While You're Unemployed LOL! Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3   1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-18

FBI WANTED - [REDACTED]

Post a comment...

Post

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness.

[REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.

[REDACTED] attended Cornell University for a year and transferred to Purdue University, where he graduated with a degree in education. Since June of 2008, [REDACTED] is believed to have traveled to Virginia, Illinois, Indiana, Wisconsin and Minnesota. [REDACTED] is believed to have lived in Arizona in 2009.

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REWARD

The FBI is offering a reward of up to \$100,000 for information leading directly to the arrest of [REDACTED]. [...] [Read full article](#)

0 2

Posted 3 weeks ago

Reporter: [REDACTED]

Views: 66

Comments: 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment...

Post

[REDACTED] report: Safety experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [...] [Read full article](#)

2 2

Posted 3 weeks ago

Reporter: [REDACTED]

Views: 97

Comments: 0

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Kauffman Attachment A-19

FTC-JERK0046442
CX0048-019

Jerk

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[REDACTED] :: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1   0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0

Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] in the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1   0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0



I'll Make 250K This Year, While You're Unemployed LOL': Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3   1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-20

FBI WANTED - [REDACTED]

Post a comment... **Post**

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness. [REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.



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REWARD

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0 2 **Posted** 3 weeks ago **Reporter** [REDACTED] **Views:** 66 **Comments:** 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment... **Post**

[REDACTED] report: Safety experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [...] [Read full article](#)



2 2 **Posted** 3 weeks ago **Reporter** [REDACTED] **Views:** 97 **Comments:** 0

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Kauffman Attachment A-21

FTC-JERK0046444
CX0048-021

Jerk :: [redacted] is not a jerk

Jerk POST A JERK REMOVE ME SCHOOLS CITIES more sign in

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StumbleUpon.com
www.stumbleupon.com/uri/www.jerk/
 Find out more about Jerk, like comments, which Stumblers liked it, how many Stumbles it got, who added it and what related content is in StumbleUpon.

[redacted] jerk or not!

[redacted] Family Therapist
 [redacted] Family Studies at Loma Linda University, [redacted]
 licensure as a Marriage and Family Therapist ...

[redacted] ed all the way up to "Narcissistic Sociopath!" Don't be fooled by what you

[redacted] IVE
 ed all the way up to "Narcissistic [.]]

votes: 3043/69748

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age: buy / sell
 address: [redacted]
 city: Choose
 zip code: buy / sell
 country:

mobile: [redacted]
 msn: buy / sell
 email: [redacted] Add

occupation: buy / sell
 universities: Kabul University Add
 employer: buy / sell
 home phone: buy / sell
 work phone: buy / sell
 license plate: buy / sell

myspace: buy / sell
 skype: buy / sell
 linked in: buy / sell

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Kauffman Attachment A-22

http://www.jerk.com [redacted] 5/1/2012 2:56:16 PM]

FTC-JERK0046445
CX0048-022

Jerk : [redacted] • is not a jerk

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Jerk : [redacted] • is not a jerk
[redacted] is a jerk or not!

[Facebook](#)
[redacted] and others you may know. Facebook

[Telephone and Username - Croonet.com](#)
[redacted]

Full text of [redacted] 1599-1910, with ...
[redacted] account of the Pembleton families of Orange

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votes: **368 / 15090**

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address:
city: [Choose](#)
zip code:
country:

mobile: [buy / sell](#)
msn: [buy / sell](#)
email: [Add](#)

occupation: [buy / sell](#)
universities: [Add](#)
employer: [buy / sell](#)
home phone: [buy / sell](#)
work phone: [buy / sell](#)
license plate: [buy / sell](#)

myspace: [buy / sell](#)
ebay: [buy / sell](#)
linked in: [buy / sell](#)

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Kauffman Attachment A-23

FTC-JERK0046446
CX0048-023

Jerk :: [redacted] is not a jerk

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Jerk :: [redacted] • is not a jerk
[redacted] is a jerk or not!

Obituaries » The Herald Banner, Greenville, TX
[redacted] her residence in Fairview. She was

The Vehicle tunes up for trin to Memphis | GoErie.com/Erie Times-News
www.goerie.com/article
"We're really competition." [redacted] e've got our hopes up for winning, but we know there's going to be a lot of
30 ...

2012 Tri-C High School Rock Off: Your guide to Cleveland's biggest ...
[redacted] 15, [redacted] freshman, bass;

Obituaries » The Herald Banner, Greenville, TX
heraldbanner.com/obituaries?start=700
[redacted] dence in Fairview. January 30, 2012 [redacted]

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votes: 70/9337

Jerk not a Jerk

Multimedia gallery
Nominate this person for Jerk of the day
Claim this profile

age: [redacted]
address: buy / sell
city: Choose
zip code: buy / sell
country:
mobile: buy / sell
msn: buy / sell
emails: [redacted] Add
occupation: buy / sell
universities: Add
employer: buy / sell
home phone: buy / sell
work phone: buy / sell
license plate: buy / sell
myspace: buy / sell
itax: buy / sell
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Kauffman Attachment A-24

Jerk :: [redacted] is a jerk

Jerk

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Facebook

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Jerk ::

[www.jerk](#)

is a jerk or not!

on, NJ | MyLife™

Find classmates, neighbors, co-workers, and more. Get back in touch with

Trenton at MyLife™.

Phone numbers, everything! www ...

numbers ...

cebook

[MyProfile/1619334168](#)

others you may know.

Facebook gives people the power to share and makes the ...

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

age: [buy / sell](#)

address: [redacted]

city: [Choose](#)

zip code: [redacted]

country: [redacted]

mobile: [buy / sell](#)

msn: [buy / sell](#)

emails: [redacted] [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

license plate: [buy / sell](#)

myspace: [buy / sell](#)

ebay: [buy / sell](#)

linkedin: [buy / sell](#)

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Kauffman Attachment A-25

http://www.jerk.com/[redacted]/2012 2:57:12 PM]

FTC-JERK0046448

CX0048-025

Jerk [POST A JERK](#) [REMOVE ME](#) [SCHOOLS](#) [CITIES](#) [more v](#) [sign in](#)

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[redacted] and others you may know. Facebook gives people the power to share and makes the world more ...

[redacted] ic, Tour Dates, Photos, Videos

[redacted] ding the latest music, albums, songs, music videos and more updates.

Jerk: [redacted] jerk

[redacted] is a jerk or not!

[redacted] event management, marketing and SEO, recruitment, interpersonal and crisis communication Coordinates ...

[redacted] in places like Texas; California; Georgia;

[Jerk](#) [not a Jerk](#)

7065/6740

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: [buy / sell](#)

address: [redacted]

city: [Choose](#)

zip code: [buy / sell](#)

country:

metale: [buy / sell](#)

msm: [buy / sell](#)

emails: [redacted] [Add](#)

occupation: [buy / sell](#)

universitat: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

license plate: [buy / sell](#)

myspace: [buy / sell](#)

ebay: [buy / sell](#)

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Kauffman Attachment A-26

Jerk : [redacted] a jerk

Jerk

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Facebook

and others you may know. Facebook gives

gie du Développement CNRS/UPMC ...

[k20anglais.html](#)

Biologie du développement - UMR7009 CNRS/UPMC - Observatoire Océanologique de Villefranche-sur-Mer

France | LinkedIn

[fr.linkedin.com](#)

Voir le profil pr

sur LinkedIn. Expérience: Propriétaire, La Cave du Tire Bouchon.

research profile on BiomedExperts

[www.biomedexperts.com/Profile/bm](#)

erved role for the nodal signaling pathway in the establishment of dorso-

Slow block

[worms.zoology](#)

[olyspermy.html](#)

Fertilization in *Paracentrotus lividus* (0.4 Mb). Courtesy of [redacted] Villefranche-sur-Mer.

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Notes: 5045/12

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: [buy / sell](#)

address: [redacted]

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

msn: [buy / sell](#)

emails: [redacted] [Add](#)

occupation: [redacted]

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

license plate: [buy / sell](#)

myspace: [redacted]

ebay: [redacted]

linkedin: [redacted]

Kauffman Attachment A-27

FTC-JERK0046450

CX0048-027

Jerk : [redacted] • is a jerk

Jerk

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[redacted] and others you may know. Facebook gives people the power to share and makes the world more...

Jerk : [redacted] is a jerk
[redacted] is a jerk or not!

[redacted] facebook [redacted]

[redacted] bul Institute of Finance .. [redacted] CEO of SIO at SIO

Tarsus pictures - Turkey Photo Gallery by [redacted] at pbase.com

[redacted] are doing is perfect and wish you best in the future. Pls mail me

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Jerk

not a Jerk

[Multimedia gallery](#)

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address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

net: [buy / sell](#)

emails: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

license plate: [buy / sell](#)

myspace: [buy / sell](#)

asky: [buy / sell](#)

linked in: [buy / sell](#)

Kauffman Attachment A-28

FTC-JERK0046451
CX0048-028

Jerk :: [redacted] is not a jerk

Jerk

POST A JERK REMOVE ME SCHOOLS CITIES more v sign in

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[redacted] melissa, title, division, [redacted] seniors, combined, runners, way

[redacted] | Facebook
and others you may know. Facebook gives

Track and Field Profile
TrackField/Athlete.as
Field stats and photos on Athletic.net

[redacted] alifornia High School ...
r track & field, cross country, and road races.

Jerk :: [redacted] is not a jerk
[redacted] is a jerk or not!

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cycles: 5/3513

Jerk not a Jerk

Multimedia gallery

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Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

mail: buy / sell

emails: [redacted] Add

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Kauffman Attachment A-29

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[redacted] is a jerk or not!

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work phone: [buy / sell](#)

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Kauffman Attachment A-30

FTC-JERK0046453

CX0048-030

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Kauffman Attachment A-32

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CX0048-032

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Kauffman Attachment A-33

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Kauffman Attachment A-34

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[Wikipedia, the free encyclopedia](#)
[\[redacted\]](#) the New York Yankees, host of
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 [redacted] sport fans during the afternoon drive. These
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 [redacted] The Plaza last night in a lavish

[YES Network announcer bio](#)
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 [redacted] Yankeeography, The

votes: **2/6**

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 universities: [Add](#)
 employer: [buy / sell](#)
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[redacted] - FBI — Homepage
[www.fbi.gov/war](#)

FBI — Child Pornog [redacted] an List
[www.fbi.gov/news/stories/](#) [po-ten](#)

[redacted] pornography, is the newest addition to the FBI's ten ...

[redacted] Wikipedia, the free encyclopedia
 [redacted] possessing and producing child

[redacted] FBI Most Wanted: Stop child pornography to end ...
 [redacted] wanted list has displayed the faces that instill fear in our
 the evil glare of ...

[redacted] FBI's Top 10 Most Wanted Fugitives: Who ...
 [redacted] former private school teacher wanted

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 universities: [Add](#)
 employer: [buy / sell](#)
 home phone: [buy / sell](#)
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[redacted] sic, Tour Dates, Photos, Videos
 [redacted] including the latest music, albums, songs, music videos and more updates.

[redacted] ecutive with broad industry experience gained in working for a variety of

[redacted] esolution, security and human rights. 18 years

[redacted] research and teaching is focused on water policy,

[redacted] hotography
 [redacted] - a unique collection of fine art photographs in the Pictorialist tradition

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 [redacted] profile on LinkedIn. Experience: Management Assistant, essencia.

[Demographic info](#) Brussels Area, Belgium | [Chemicals](#) Current:

[Facebook](#)
 [redacted] and others you may know. Facebook

[Facebook](#)
 [redacted] and others you may know. Facebook gives

[LinkedIn](#)

votes: 191/0

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http://www.jerk.com/[redacted].html[5/1/2012 3:01:16 PM]

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Web Page
Isfahan, Iran Te [redacted] Activity:

Person mit Bilder, News & Links ...
[Person-Information](#)

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votes: 6/14

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MARRIAGE FITNESS

with Mort Fertel

An Alternative to Counseling



Get FREE Marriage e-Help Immediately

"7 Secrets to Stopping Your Divorce"



“ Dear Mort,
 I got your free emails for months and they've helped enormously. Truth is, without your advice, I'd be divorced by now. Instead, the affair is over and we're on the mend. Thank you.
 Drew C.,
 Madison, Il ”

A FREE e-help email series that includes:

- 5 marriage assessments
- "I love you but I'm not IN LOVE with you."
- How to get your spouse to change
- How to get over the past (and past the hurt)
- How to stop a divorce
- How to avoid a separation
- How to spoil their affair
- How to increase your marriage IQ
- How to forgive and be forgiven
- And 35 other marriage crisis solutions

Sign up FREE Today.

First Name

Email

GET FREE HELP NOW ▶

SECURE & CONFIDENTIAL I will never share or sell your information. Your privacy is important to me.

AS SEEN ON



LIFE HomeJournal

FamilyCircle

Psychology Today

Here's a sample of some of the free stop divorce information available by signing up in the box above:

- "I love you but I'm not IN LOVE with you." An analysis and a solution.
- How to change your marriage even when your spouse doesn't want to.
- How to get your spouse to change.
- How to forgive and be forgiven.
- How do you know when to quit?
- Analysis Paralysis: How to unstuck your marriage
- How to end a separation.
- How to stop a divorce.

Kauffman Attachment A-41

- How to end an affair and reconnect at home.
- How to heal your spouse's hurt and get them to give you another chance.
- How to talk so your spouse listens and listen so your spouse talks.
- How to get over your past (and past your hurt)
- How to protect your children from your marriage problems
- How to know if your marriage will survive.
- How to increase your marriage IQ.
- How to get your spouse to STOP.
- How to restore honor and dignity to your relationship
- How to heal old wounds in your marriage
- How to say "I'm sorry."

You get all this information for FREE and more plus 5 relationship profiles simply by signing up in the box above. If you want to stop your divorce, sign up now. It's absolutely free and you can learn how to stop divorce right away.

ABOUT MORT FERTEL

Author and Founder of the Marriage Fitness System for Relationship Renewal



Mort Fertel is a world authority on the psychology of relationships and has an international reputation for saving marriages and stopping divorces. In addition to working with couples, he teaches individuals how to single-handedly transform their marital situation.

People from all over the world schedule private tele-sessions with Mort Fertel and seek his counsel by joining the Marriage Fitness Tele-Boot Camp. He is the author of Marriage Fitness Audio Learning System and the creator of Marriage Fitness Home-Flex, the most comprehensive relationship home learning kit in the world. Over 100,000 people a year subscribe to his free e-zine.

Mort Fertel was a featured expert on ABC, NBC, CBS, PBS, and the Fox News Network. He is also a frequent guest on talk radio programs. His breakthrough program, Marriage Fitness, appeared in the New York Times, Chicago Tribune, Los Angeles Times, USA Today, Family Circle, Psychology Today, Ladies Home Journal, Glamour Magazine, Parent & Child Magazine, Philadelphia Inquirer, Library Journal, Women's Health, Denver Post, Orlando Sentinel, Baltimore Sun, and Toronto Sun.

Mort's Marriage Fitness program is endorsed by marriage counselors, therapists, relationship experts, and mental health professionals. And he has helped save thousands of marriages.

Mort Fertel graduated from the University of Pennsylvania, was the CEO of an international non-profit organization, and a former marathon runner. He lives with his wife and 5 children (including triplets!) in Baltimore, Maryland.

[60 second audio about Mort and Marriage Fitness. Click here.](#)

Enjoy this sample article.

HOW DO YOU KNOW IF YOU MARRIED THE RIGHT PERSON?

During one of my seminars, a woman asked me a question. She said, "How do I know if I married the right person?"

I noticed that there was a large man sitting next to her so I said, "It depends. Is that your husband?"

Kauffman Attachment A-42

In all seriousness, how do you know?

Here's the answer.

EVERY relationship has a cycle. In the beginning, you fell in love with your spouse. You anticipated their call, wanted their touch, and I ked their idiosyncrasies.

Falling in love with your spouse wasn't hard. In fact, it was a completely spontaneous experience. You didn't have to DO anything. That's why it's called "falling" in love - because it's happening TO YOU.

People in love sometimes say, "I was swept off my feet." Think about the imagery of that expression. It implies that you were just standing there; doing nothing, and then something came along and happened TO YOU.

Falling in love is easy. It's a passive and spontaneous experience.

But after a few years of marriage, the euphoria of love fades. It's the natural cycle of EVERY relationship. Slowly but surely, phone calls become a bother (if they come at all), touch is not always welcome (when it happens), and your spouse's idiosyncrasies, instead of being cute, drive you nuts.

The symptoms of this stage vary with every relationship, but if you think about your marriage, you will notice a dramatic difference between the initial stage when you were in love and a much duller or even angry subsequent stage.

At this point, you and/or your spouse might start asking, "Did I marry the right person?" And as you and your spouse reflect on the euphoria of the love you once had, you may begin to desire that experience with someone else. This is when marriages breakdown. People blame their spouse for their unhappiness and look outside their marriage for fulfillment.

Extramarital fulfillment comes in all shapes and



Kauffman Attachment A-43



sizes. Infidelity is the most obvious. But sometimes people turn to work, church, a hobby, a friendship, excessive TV, or abusive substances.

But the answer to this dilemma does NOT lie outside your marriage. It lies within it.

I'm not saying that you couldn't fall in love with someone else. You could. And TEMPORARILY you'd feel better. But you'd be in the same situation a few years later. Because (listen carefully) THE KEY TO SUCCEEDING IN MARRIAGE IS NOT FINDING THE RIGHT PERSON; IT'S LEARNING TO LOVE THE PERSON YOU FOUND.

SUSTAINING love is not a passive or spontaneous experience. It'll NEVER just happen to you. You can't "find" LASTING love. You have to "make" it day in and day out. That's why we have the expression "the labor of love." Because it takes time, effort, and energy. And most importantly, it takes WISDOM. You have to know WHAT TO DO to make your marriage work.

Make no mistake about it. Love is NOT a mystery. There are specific things you can do (with or without your spouse) to succeed with your marriage.

Just as there are physical laws of the universe (such as gravity), there are also laws for relationships. Just as the right diet and exercise program makes you physically stronger, certain habits in your relationship WILL make your marriage stronger. It's a direct cause and

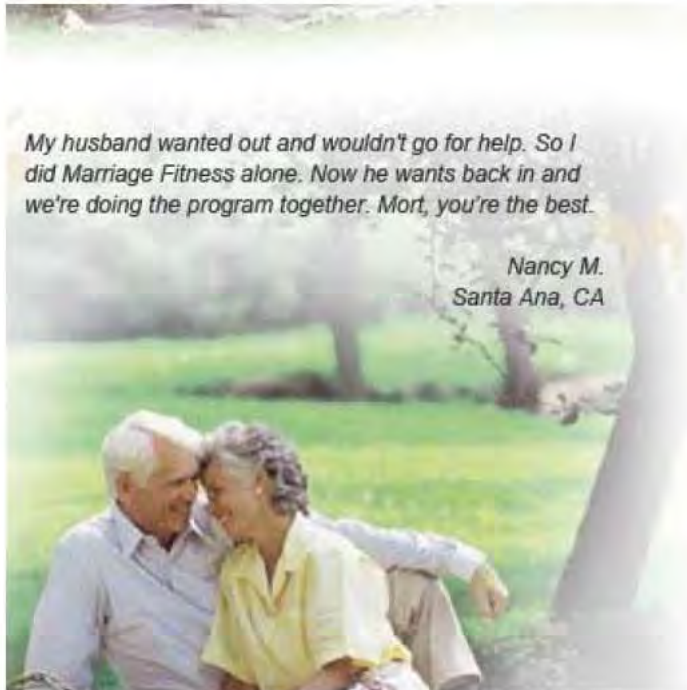
Kauffman Attachment A-44



effect. If you know and apply the laws, the results are predictable - you can "make" love.

Marriage Fitness a step-by-step system for making and maintaining love in your marriage. And the program works for any marriage even if only one spouse does it.

So what's your first step?
Sign up here.



My husband wanted out and wouldn't go for help. So I did Marriage Fitness alone. Now he wants back in and we're doing the program together. Mort, you're the best.

Nancy M.
Santa Ana, CA

Get FREE Marriage Help.

And get a **FREE** relationship assessment. *No strings attached.* Sign-up I'll send you both.

After the **FREE** sign-up, you'll receive free online marriage tips that will help you rebuild your marriage now.

I've been where you're at and I have answers for you. I'll explain more in a moment. See you on the next page.

SIGN UP FREE TODAY

Email

GET FREE HELP NOW >

SECURE & CONFIDENTIAL I will never share or sell your information. Your privacy is important to me.

Kauffman Attachment A-45

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"Online jobs give new hope during recession"

WEEKLY JOBS REPORT



"Recession Buster" working online from home provides solid income in stale market

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Market Tracker	Dow	-2.35	Nasdaq	+8.52	S&P 500	+1.59	Treasurys	-0.03	Oil	-1.55	U.S. Dollar	+0.0041
	19,891.62	+0.02%	2,426.23	+0.35%	1,171.00	+0.14%	10-year yield	3.54%	Price/barrel	\$74.10	1 Euro =	\$1.2558

EXPOSED: New Jersey Mom Makes \$8,000/Month And You Won't Believe How She Does It!

As Seen In The Media:

[REDACTED]
Consumer Trend Investigator | Your Daily Finance
Posted: Tuesday, April 24, 2012 Wednesday, April 11, 2012



"Melissa puts her computer to work and makes money while working from home. She says that Home Jobs Revealed has helped change her financial life and recommends it to people as a good opportunity."

Have You Ever Considered Working From Home Online?

[REDACTED] NJ05 never thought that she would work online, until curiosity got the best of her and she ordered a course from Millionaire author Michelle Taylor called Home Jobs Revealed. Before she knew it, she discovered her secret to beating the recession, and being able to provide for her family while at home with her three children.

I heard about Mellisa from a colleague last month and decided to feature her story in our weekly consumer report. In our phone interview she told me her amazing story. "I actually make a steady \$7,000-\$8,000 a month working from home online. It's enough to comfortably replace my old jobs income, especially

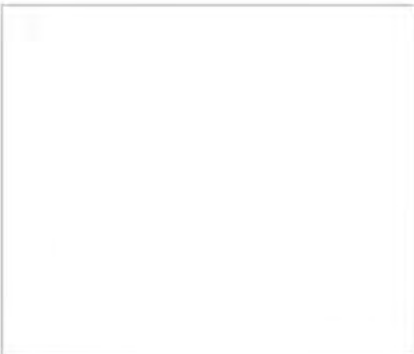
considering I only work about 15 hours a week from my own home online. It gives me so much time to spend with my family."



A check Melissa recently received using the Home Jobs Revealed System

Working online has been a financial windfall for Melissa, who struggled for months to find a decent job but kept hitting dead ends. "I lost my job shortly after the recession hit, I needed reliable income, I was not interested in the "get rich quick" scams you see all over the internet. Those are all pyramid scams or stuff where you have to sell to your friends and family. I just needed a legitimate way to earn a living for me and my family. The best part of working online is that I am always home with the kids. Thanks to the Multipul Streams of Income Kit I am giving my kids the childhood they deserve."

I asked her about how she started her life-changing journey. "It was pretty easy", I saw an ad by Michelle Taylor about a course called Home Jobs Revealed. I knew about Michelle Taylor from TV and knew she was legit, and since they offered a "365 Day Money Back



[REDACTED] is a regular mom who lost her job last year, and after an unsuccessful job hunt, she started working online. I interviewed her about her amazing story and she revealed her steps for success.

Step 1
Go to [Home Jobs Revealed](#), and fill out the form to get instant online access.

Step 2
Use the [Michelle Taylor's Home Jobs Revealed Course](#) and follow the simple online instructions. You will begin earning revenue within minutes.

Kauffman Attachment A-47

Guarantee - I figured I really had nothing to lose. so I invested in the course.

I got the course and within five weeks I had made over \$8,000!!! Its really simple, I am not a computer whiz, but I can use the internet. I follow Michelle Taylor's simple instruction. "I don't even have to sell anything and nobody has to buy anything from me". There are openings all over the country, you should try it."

The companies you work with are worth over 100 billion dollars and are the most used sites in the internet market place, like Amazon, Google, Walmart, Delta, Apple and more... You're using the top ranked sites in the world, over 50 percent of all internet traffic flows through them everyday. It's a great opportunity and this has been helping people work at home online for over 5 years. Why not get in with the internet's best and biggest companies?

There are plenty of scams on the internet claiming you can make \$50,000 a month, but that is exactly what they are, scams. This kit, however, is not definately not one of those! From my conversation with Melissa, "I am making a good salary from home online, which is amazing, under a year ago I was jobless in a horrible economy. Today I make about \$80/Hr and I don't even have to leave the house. I thank God every day that I filled out that form and got my kit just minutes later."

Quickly, [REDACTED] was able to use the simple Michelle Taylor's [Home Jobs Revealed](#) to make it out of the recession.

"I went from a fixed salary at work to grossing an additional \$7,000-\$8,000 a month from my home computer."



Melissa had never shared her story before, this is the first time she's going public

If you would like to take advantage of the same opportunity as Melissa. Here's how to get started:

Step 1

Go to [Michelle Taylor's Home Jobs Revealed](#), and fill out the form to get instant online access to the program.

Step 2

Use the [Michelle Taylor's Home Jobs Revealed Course](#) and follow the simple online instructions. You will begin earning revenue within minutes.

Step 3

Deposit your Earnings by check or direct bank transfer, they pay every week. (Making money has never been so easy. Get ready for your life to change.)

Associated Links:

[Michelle Taylor - OFFICIAL WEBSITE](#)

WARNING - OFFER EXPIRES ON Wednesday, May 2, 2011 Thursday, April 19, 2011

Read Responses For This Article

("Work At Home Mom Makes \$8,000/Month Part-Time.")



[REDACTED] 24, 2012Wednesday, April 11, 2012 @ 9:37am

does this really work? I mean the whole working at home stuff? Has anyone tried this

Step 3

Deposit your earnings into your bank account(you are paid weekly)! Enjoy Life!

WARNING - OFFER EXPIRES ON Wednesday, May 2, 2011 Thursday, April 19, 2011

Weather

[Weather Forecast](#) | [Weather Maps](#) | [Weather Radar](#)

Mortgages	Home Equity Loan	Insurance	Credit Cards	CDs
Overnight Avg Rate		Latest	Change	Last Week
30 yr fixed		4.70%	▲	4.58%
15 yr fixed		4.05%	▲	3.93%
5/1 ARM		3.42%	▼	3.44%
30 yr refi		4.59%	▲	4.49%
15 yr refi		3.90%	▲	3.83%

View rates in your area Rate data provided by Bankrate.com

Enter ZIP code

Today's featured rates:

30 yr jumbo, 0 points, Cleveland, OH, APR 5.125%

*Rates subject to change

Kauffman Attachment A-48

Work At Home Special Report!

yet? Looks promising..



Tuesday, April 24, 2012 Wednesday, April 11, 2012 @ 10:42am

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Wednesday, April 25, 2012 Thursday, April 12, 2012 @ 6:18pm

I just wanted to tell everyone I got my first check today for \$800!



Wednesday, April 25, 2012 Thursday, April 12, 2012 @ 11:03am

This is amazing! With all the scams online it was hard to find a legit system now a days, thanks for the info...



Kauffman Attachment A-49

Work At Home Special Report!

Thursday, April 26, 2012Friday, April 13, 2012 @ 2:33pm

Even though I was not very pleased ordering online didn't wanna miss out on this offer, Great service and many thanks for the information, I have gone and ordered..



Thursday, April 26, 2012Friday, April 13, 2012 @ 4:58pm

It's nice to read your story Ben....glad you are making some money! Gives me hope that it will work for me too! hopefully I could come out of my college debt...



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I just got the package. Thanks for the advice! I will keep in touch.. I could be making some extra money soon...:)



Friday, April 27, 2012Saturday, April 14, 2012 @ 10:48am

Just a quick notice... It does work but you have to be able to use a computer at least somewhat. If you can use email, etc. then you'll be fine.



Friday, April 27, 2012Saturday, April 14, 2012 @ 11:08am

I think this is great and will come in really handy right now. I'm not the best computer user but I think I can post links!!! :)



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I just started 6 weeks ago and I've gotten 2 check for a total of \$2,200...this is the best decision I made in a long time! "Thank you for giving me this extraordinary opportunity to make extra money from home. This extra cash has changed my life in so many ways, thank you!"



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I will do anything to never have to work in a 4 x 4 cubicle ever again...if I could be my own boss that would be amazing...



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The timing of this couldn't be better, We are struggling too and this could be our answer.



Saturday, April 28, 2012Sunday, April 15, 2012 @ 10:27am

Does this really work guys..? I'm a bit skeptical.. how much effort do I have to put?

Kauffman Attachment A-50



[Redacted Name]

Saturday, April 28, 2012 Sunday, April 15, 2012 @ 11:51am

Hey Jen, I'm using it now and it's awesome! I've signed up for my account and have been bringing in fat paychecks. For real, my first week I made \$302 and the second week I doubled it and then it kinda snowballed to \$120 a day! juset follow the course.. they will help you out...



[Redacted Name]

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Thanks for the info, just started this 5 weeks ago. I've got 2 checks for a total of \$750, pretty cool.!



Wes

Saturday, April 28, 2012 Sunday, April 15, 2012 @ 8:12pm

I ordered it today.. can't wait to get my hands on it.. thanks for the info...

Leave a Reply

Name (required)

Mail (will not be published) (required)

Website

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Kauffman Attachment A-51

Your Source To Smarter Living

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"Online jobs give new hope during recession"

WEEKLY JOBS REPORT



"Recession Buster" working online from home provides solid income in stale market

This Site not affiliated with any newspaper publications

Home Finance Tech Economy Media All Stories Portfolios Market News Video Investing More Market News

Market Tracker	Dow	-2.35	Nasdaq	+8.52	S&P 500	+1.59	Treasurys	-0.03	Oil	-1.55	U.S. Dollar	+0.0041
	19,891.62	+0.02%	2,426.23	+0.35%	1,171.00	+0.14%	10-year yield	3.54%	Price/barrel	\$74.10	1 Euro =	\$1.2558

EXPOSED: New Jersey Mom Makes \$8,000/Month And You Won't Believe How She Does It!

As Seen In The Media:

Consumer Trend Investigator | Your Daily Finance
Posted: Tuesday, April 24, 2012 Wednesday, April 11, 2012



"Melissa puts her computer to work and makes money while working from home. She says that Home Jobs Revealed has helped change her financial life and recommends it to people as a good opportunity."

Have You Ever Considered Working From Home Online?

NJ05 never thought that she would work online, until curiosity got the best of her and she ordered a course from Millionaire author Michelle Taylor called Home Jobs Revealed. Before she knew it, she discovered her secret to beating the recession, and being able to provide for her family while at home with her three children.

I heard about Mellisa from a colleague last month and decided to feature her story in our weekly consumer report. In our phone interview she told me her amazing story. "I actually make a steady \$7,000-\$8,000 a month working from home online. It's enough to comfortably replace my old jobs income, especially

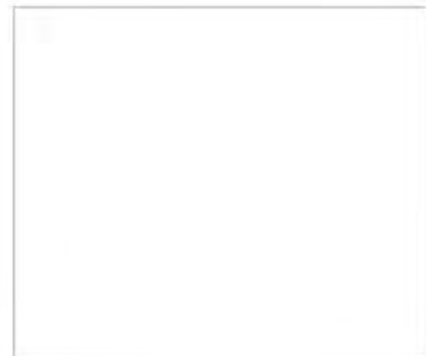
considering I only work about 15 hours a week from my own home online. It gives me so much time to spend with my family."



A check from vealed System

Working online has been a financial windfall for Melissa, who struggled for months to find a decent job but kept hitting dead ends. "I lost my job shortly after the recession hit, I needed reliable income, I was not interested in the "get rich quick" scams you see all over the internet. Those are all pyramid scams or stuff where you have to sell to your friends and family. I just needed a legitimate way to earn a living for me and my family. The best part of working online is that I am always home with the kids. Thanks to the Multipul Streams of Income Kit I am giving my kids the childhood they deserve."

I asked her about how she started her life-changing journey. "It was pretty easy", I saw an ad by Michelle Taylor about a course called Home Jobs Revealed. I knew about Michelle Taylor from TV and knew she was legit, and since they offered a "365 Day Money Back



is a regular mom who lost her job last year, and after an unsuccessful job hunt, she started working online. I interviewed her about her amazing story and she revealed her steps for success.

Step 1
Go to [Home Jobs Revealed](#), and fill out the form to get instant online access.

Step 2
Use the [Michelle Taylor's Home Jobs Revealed Course](#) and follow the simple online instructions. You will begin earning revenue within minutes.

Kauffman Attachment A-52

Guarantee - I figured I really had nothing to lose. so I invested in the course.

I got the course and within five weeks I had made over \$8,000!!! Its really simple, I am not a computer whiz, but I can use the internet. I follow Michelle Taylor's simple instruction. "I don't even have to sell anything and nobody has to buy anything from me". There are openings all over the country, you should try it."

The companies you work with are worth over 100 billion dollars and are the most used sites in the internet market place, like Amazon, Google, Walmart, Delta, Apple and more... You're using the top ranked sites in the world, over 50 percent of all internet traffic flows through them everyday. It's a great opportunity and this has been helping people work at home online for over 5 years. Why not get in with the internet's best and biggest companies?

There are plenty of scams on the internet claiming you can make \$50,000 a month, but that is exactly what they are, scams. This kit, however, is not definately not one of those! From my conversation with Melissa, "I am making a good salary from home online, which is amazing, under a year ago I was jobless in a horrible economy. Today I make about \$80/Hr and I don't even have to leave the house. I thank God every day that I filled out that form and got my kit just minutes later."

Quickly, [REDACTED] was able to use the simple Michelle Taylor's [Home Jobs Revealed](#) to make it out of the recession.

"I went from a fixed salary at work to grossing an additional \$7,000-\$8,000 a month from my home computer."



Melissa had never shared her story before, this is the first time she's going public

If you would like to take advantage of the same opportunity as Melissa. Here's how to get started:

Step 1

Go to [Michelle Taylor's Home Jobs Revealed](#), and fill out the form to get instant online access to the program.

Step 2

Use the [Michelle Taylor's Home Jobs Revealed Course](#) and follow the simple online instructions. You will begin earning revenue within minutes.

Step 3

Deposit your Earnings by check or direct bank transfer, they pay every week. (Making money has never been so easy. Get ready for your life to change.)

Associated Links:

[Michelle Taylor - OFFICIAL WEBSITE](#)

WARNING - OFFER EXPIRES ON Wednesday, May 2, 2011 Thursday, April 19, 2011

Read Responses For This Article

("Work At Home Mom Makes \$8,000/Month Part-Time.")



Tuesday, April 24, 2012 Wednesday, April 11, 2012 @ 9:37am

does this really work? I mean the whole working at home stuff? Has anyone tried this

Step 3

Deposit your earnings into your bank account(you are paid weekly)! Enjoy Life!

WARNING - OFFER EXPIRES ON Wednesday, May 2, 2011 Thursday, April 19, 2011

Weather

[Weather Forecast](#) | [Weather Maps](#) | [Weather Radar](#)

Mortgages	Home Equity Loan	Insurance	Credit Cards	CDs
Overnight Avg Rate		Latest	Change	Last Week
30 yr fixed		4.70%	▲	4.58%
15 yr fixed		4.05%	▲	3.93%
5/1 ARM		3.42%	▲	3.44%
30 yr refi		4.59%	▲	4.49%
15 yr refi		3.90%	▲	3.83%

View rates in your area Rate data provided by Bankrate.com

Enter ZIP code

Today's featured rates:

30 yr jumbo, 0 points, Cleveland, OH, APR 5.125%

*Rates subject to change

Kauffman Attachment A-53

Work At Home Special Report!

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Kauffman Attachment A-54

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Kauffman Attachment A-55



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Leave a Reply

Name (required)

Mail (will not be published) (required)

Website

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Kauffman Attachment A-56

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Just login to download our eBooks for FREE!


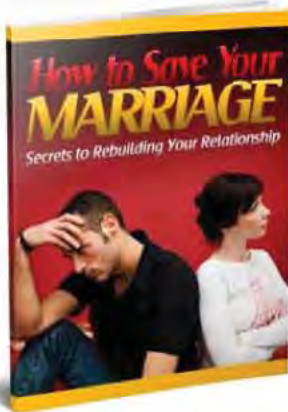
Enter your e-mail

Enter password:

Home Health **Family** Home & Garden Entertainment

You are here: [Home](#) > [Family](#) > [How to Save Your Marriage](#)

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How to Save Your Marriage

Secrets to Rebuilding Your Relationship







[Download Now!](#) 

 Like  24 likes. Sign Up to see what your friends like.

About this eBook

Are you in a state of despair because you feel like your marriage is on the brink of divorce? Don't worry! Save Your Marriage will teach you everything you need to know. It doesn't matter if your partner's not communicating with you right now. It doesn't matter if you have come to believe that all hope is gone. This book will show you exactly how to start your road to recovery. We'll teach you how to change your mind, your heart, and your actions to possibly win back the man or woman that you married before they're gone for good. Imagine having a happy home once more! Are you ready? Then read on, and pick up your copy today.

You're About To Discover:

-  4 mistakes that couples make when they come into conflict, and how to fix them!
-  A simple method that will help you fall in love with your spouse again.
-  6 techniques to get you talking again!
-  3 methods for strengthening your family in ways you never imagined were even possible!
-  7 mindset techniques that will help you make changes—today!
-  6 things you need to know about sex and your marriage.

Your marriage doesn't have to end now!

You DON'T have to get a divorce, no matter how bad things look today. You have nothing to lose by trying, and the future that you've been dreaming of to gain. Listen, why should you become a marriage statistic? This eBook holds proven techniques taught by expensive marriage counselors across the country. The techniques can work, whether you're the only one who is trying or whether you and your spouse are both equally committed to salvaging your romance. Download it now!

 Like  24 likes. Sign Up to see what your friends like.

Kauffman Attachment A-57

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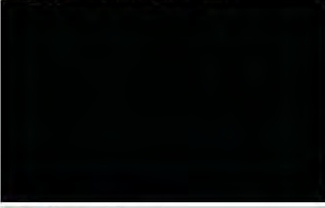
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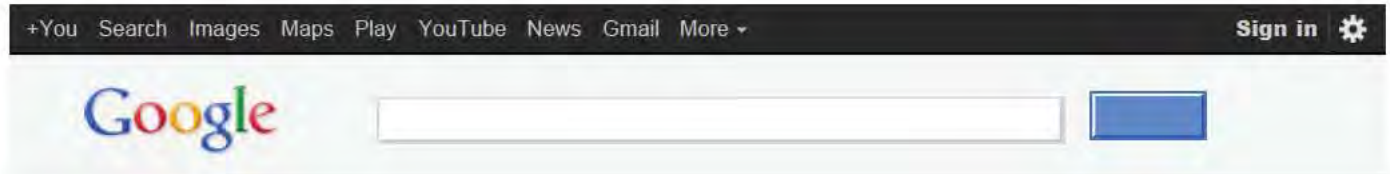
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5 comments ▾

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American University when its over its over. November 3, 2011 at 7:24pm

How to Save Your Marriage Download Now! [Image of man with laptop]

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What are AdChoices?



The [AdChoices icon](#) appears on sites that use Google's [AdSense](#) program to show ads. While Google often shows you ads based on the content of the page you are viewing, we also show some ads based on the types of websites you visit, view, or where you interact with an ad or other Google product supported by Google's advertising services. In doing this, Google doesn't know your name or any other personal information about you. Google simply recognizes the number stored in your browser on the DoubleClick cookie, and shows ads related to the interest and inferred demographic categories associated with that cookie. It's our goal to make these ads as relevant and useful as possible for you. Google doesn't create categories, or show ads, based on sensitive topics such as race, religion, sexual orientation, or health.

Where can I learn more about how Google protects privacy?

- To learn more about how we collect and use information at Google, please visit [our Privacy Center](#)

What choices do I have about advertising from Google?

- Google lets you edit the categories associated with your browser, or opt out of personalized advertising, through Google's [Ads Preferences Manager](#).
- Google may use your Google account information, such as items you +1 on Google properties and across the web, to personalize content and ads on non-Google websites. If you'd like to control how you see +1 recommendations from people you know, and how your +1 recommendations are shown to others, please visit the +1 button [account setting](#) page.

Learn More!

- [Learn more](#) about online advertising from the Network Advertising Initiative.
- [Find more](#) on browser controls and plug-in tools to help set and maintain your privacy choices.

Kauffman Attachment A-59

[http://support.google.com/...our-Marriage&rd=3&contact=abg_afc&url=http:%2F%2Fwww.jerk.com%2F&adT=Save+Your+Marriage\[5/1/2012 3:03:30 PM\]](http://support.google.com/...our-Marriage&rd=3&contact=abg_afc&url=http:%2F%2Fwww.jerk.com%2F&adT=Save+Your+Marriage[5/1/2012 3:03:30 PM])

FTC-JERK0046482

CX0048-059



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Advertise your business with ads by Google all over the web

[Try AdWords »](#)

- **Only pay if your ads work** – You pay only when someone clicks on your ad.
- **Target potential customers at the right moment** – When they are browsing the web and reading up on relevant topics.
- **It's easy and simple to manage** – Out of hundreds of thousands of websites, Google AdWords automatically places your ads on those websites that are right for you.
- **Sign up today - it's easy!** You can do it yourself in just minutes. No contract or minimum spend required.

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Report a policy violation regarding the site or ads you just saw:

The issue(s) were with:

- the website
- the ads

Tell us how we're doing - Answer five short questions about your help center experience

AdSense - Contacting Us - Help for other Google products - Change language: English (US)

©2012 Google - Google Home - [New!](#) Privacy Policy - Terms of Service - Report a Policy Violation

Kauffman Attachment A-60

[http://support.google.com/...our-Marriage&rd=3&contact=abg_afc&url=http:%2F%2Fwww.jerk.com%2F&adT=Save+Your+Marriage\[5/1/2012 3:03:30 PM\]](http://support.google.com/...our-Marriage&rd=3&contact=abg_afc&url=http:%2F%2Fwww.jerk.com%2F&adT=Save+Your+Marriage[5/1/2012 3:03:30 PM])

FTC-JERK0046483

CX0048-060

Kauffman Attachment A-61

[http://support.google.com/...our-Marriage&rd=3&contact=abg_afc&url=http:%2F%2Fwww.jerk.com%2F&adT=Save+Your+Marriage\[5/1/2012 3:03:30 PM\]](http://support.google.com/...our-Marriage&rd=3&contact=abg_afc&url=http:%2F%2Fwww.jerk.com%2F&adT=Save+Your+Marriage[5/1/2012 3:03:30 PM])

FTC-JERK0046484

CX0048-061

Jerk

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[more](#) v

[sign in](#)

Find a Person, an University, or a City

search 

[REDACTED] :: The Homewrecker

Post a comment...

Post

[REDACTED] is what is known as an army slut. She is a married woman who sleeps around with married/taken men (both in & out of the military). Both men and women have spoken up about her attempts at destroying marriages/relationships & families. She has been often been undeservingly praised and people here have come forward speaking of what her true character consists of. [...] [Read full article](#)



1   0

Posted 21 hours ago

Reporter: anonymous

Views: 72

Comments: 0



Worst People Ever Catch Foul Ball, Refuse To Give It To A Crying Child, Are Vilified By [REDACTED] [UPDATE]

Post a comment...

Post

An unfortunate scene unfolded in Arlington tonight as a pair of Rangers fans caught a foul ball tossed into the stands by [REDACTED] the eighth inning of Rangers-Yankees, then refused to give the ball to the toddler sitting next to them—instead choosing to pose for pictures and generally behave like douchebags. [...] [Read full article](#)



1   0

Posted 5 days ago

Reporter: anonymous

Views: 13

Comments: 0


I'll Make 250K This Year, While You're Unemployed LOL': Monster.com Recruiting Goes Horribly Wrong

Post a comment...

Post

A man we'll call [REDACTED] has a profile on the employment website Monster.com, and earlier today he received a message from a recruiter about a job in "beautiful Northwest Arkansas." [...] [Read full article](#)



3   1

Posted 2 weeks ago

Reporter: Jerk Dotcom

Views: 149

Comments: 0

Kauffman Attachment A-62

FBI WANTED - [REDACTED]

Post a comment...

Post

[REDACTED] has often been described as a computer "expert" and has demonstrated above-average knowledge regarding computers, the use of the Internet, and security awareness.

[REDACTED] has the ability to integrate into various socio-economic classes, and is an expert at social engineering. He possesses an educational background conducive to gaining employment in fields having a connection to children. [REDACTED] may advertise online as a tutor or male nanny.



[REDACTED] attended Cornell University for a year and transferred to Purdue University, where he graduated with a degree in education. Since June of 2008, [REDACTED] is believed to have traveled to Virginia, Illinois, Indiana, Wisconsin and Minnesota. [REDACTED] is believed to have lived in Arizona in 2009.

CAUTION

[REDACTED], a former private-school teacher, is wanted for allegedly possessing child pornography in Washington, DC. It is alleged that in June of 2008, pornographic images were found on a school camera that had been in [REDACTED] possession. [REDACTED] also allegedly produced child pornography in Maryland.

REWARD

The FBI is offering a reward of up to \$100,000 for information leading directly to the arrest of [REDACTED]. [\[...\] Read full article](#)

0 2

Posted 3 weeks ago

Reporter: Chuck Norris

Views: 66

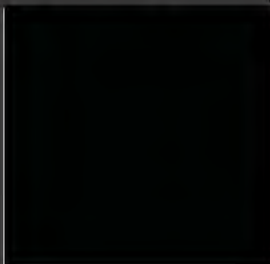
Comments: 0

Pilot Requests Emergency Landing, Tower Calls 'B.S.'

Post a comment...

Post

[REDACTED] report: Safety experts are stunned after a passenger plane filled with smoke while trying to land at a snowy Denver International Airport, but the air traffic controller dismissed the call for help from the pilot. The April 3 flight from Peoria, Ill., was scheduled to land in Denver. Everything was going according to plan until smoke filled the plane. The pilot of the United plane called the control tower to request an emergency landing. Emergency, smoke in cockpit, roll trucks, please, said the pilot. [\[...\] Read full article](#)



2 2

Posted 3 weeks ago

Reporter: Chuck Norris

Views: 97

Comments: 0

<<Previous 1 2 3 4 5 6 7 8 9 10 11 12 13 Next>>

Kauffman Attachment A-63

FTC-JERK0046486
CX0048-063

Jerk :: [redacted] • is a jerk

Jerk

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Jerk :: [redacted] • is a jerk

www.jerk.com/

[redacted] s a jerk or not!

[redacted] [Rhapsody in blue](#) | [redacted] part1 ...

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views,

votes: 16608/930

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[Claim this profile](#)

age: [redacted]
address: [redacted]
city: [El Mirage \(change\)](#)
zip code: [redacted]
country: [Arizona](#)

mobile: [buy / sell](#)
res: [buy / sell](#)
omars: [redacted] [Add](#)

occupation: [redacted]
universities: [Add](#)
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Kauffman Attachment A-64

http://www.jerk.com [redacted] 5/1/2012 3:04:37 PM]

FTC-JERK0046487
CX0048-064

Jerk :: [redacted] s a jerk

Jerk

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on Myspace

[www.myspace.com](#)

space, the leading social entertainment destination powered by the passion of our

United Kingdom | LinkedIn

Director of Development at MGS

United Kingdom | LinkedIn

creative lead with a firm design background and 18 years experience with a proven record of success in development of innovative games ...

dia

r his appearances in the television and radio series

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votes: 18/0

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

age: buy / sell

address:

city: Choose

zip code:

country:

mobile:

man: buy / sell

emails:

Add

occupation: buy / sell

university: Bishop's University

Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

Kauffman Attachment A-65

FTC-JERK0046488

CX0048-065

Jerk :: [redacted] s a jerk

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M & FM, KWNO AM & FM, KHME FM

igh, Cotter High, Rushford, Lewiston Altura High, Winona Chiefs, KG 95.3 todays hits and y 1380, Shopping ...

Mississippi Jets

[mississippijets.org](#)

Rival biker gangs brawl in Minneiska [redacted] y News

dispatched after a report that several motorcycle gang ... the day, Gannrude said. Deputies were

Daily News

[www.winonadailynews.com](#)

Winona County emergency and medical personnel used a mock rescue Saturday to test a ... The gang at Aardman Animations, producers of the whimsical and wonderful "Wallace ...

The [redacted] A Bicycle Gang on Myspace

[www.myspace.com](#)

bicycle Gang's profile on Myspace, the leading social entertainment destination powered by the

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Jerk

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Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

name: [redacted]

address: [buy / sell](#)

city: Anaheim [\[change\]](#)

zip code: [buy / sell](#)

country: California

mobile: [redacted]

msn: [buy / sell](#)

emails: [redacted] [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

licence plate: [buy / sell](#)

myspace: [buy / sell](#)

ebay: [buy / sell](#)

linked in: [buy / sell](#)

Kauffman Attachment A-66

FTC-JERK0046489

CX0048-066

Jerk : [redacted] • is a jerk

Jerk POST A JERK REMOVE ME SCHOOLS CITIES more v sign in

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Public Prayer Requests - BELIEVE Day of Prayer October 6th | Facebook
[ko-kr connect.facebook.com/note.p](#)
 I will a [redacted] he Lord move those mountains, make the paths clear,
 d the people of God ...

[redacted] last name) in the US Identify People Search Database
[www.usidentify.com/](#)

[redacted] COVENANT CHURCH 9 months ago (June 2010) ...
[fundraising page - www.insignivng.com/](#)

[redacted] | People Directory | Facebook
 Results from the People directory for [redacted]. Search Facebook for more People with names like [redacted]

Obituaries and funeral notices for Fort Dodge - MessengerNews.net ...
[www.messengernews.net/page/category/detail/nav/5011/Obituaries.htm](#)
 Obituaries and funeral notices from The Messenger. The Messenger serves the Fort Dodge, Webster County and the North Central Iowa region with the latest local and ...

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votes: 246.0

Jerk not a Jerk

Multimedia gallery
 Nominate this person for Jerk of the day
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age: [buy / sell](#)
 address: [redacted]
 city: [Choose](#)
 zip code: [redacted]
 country:
 mobile: [redacted]
 msn: [redacted]
 emails: [redacted] [Add](#)
 occupation: [redacted]
 universities: [Add](#)
 employer: [redacted]
 home phone: [redacted]
 work phone: [redacted]
 licence plate: [buy / sell](#)
 myspace: [buy / sell](#)
 ebay: [buy / sell](#)
 linked in: [buy / sell](#)

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Kauffman Attachment A-67

Jerk

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[redacted] download the song, or visit the [redacted] website

[redacted] Wikipedia, the free encyclopedia [redacted] discovered in 2008 by [redacted]

[redacted] discovered in 2008 by [redacted]

[redacted] Free Music, Tour Dates, Photos, Videos
www.myspace.com [redacted] sic videos and more updates.

[redacted] e players. Streaming version uses fake data because of security issue with Flash Media Server 2 and AS3. http://forums.adobe ...

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posts: 319/0

Jerk not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: buy / sell

address: buy / sell

city: Boston [change]

zip code: buy / sell

country: Massachusetts

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Mohammad Ali Jinnah University, Karachi
Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

Kauffman Attachment A-68

Jerk

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Grew Up
is not a Jerk

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grew up - definition of grew up by the Free Online Dictionary ...
www.thefreedictionary.com/grew+up
grow (gr) v. grew (gr), grown (gr n), grow ing, grows. v intr. 1. To increase in size by a natural process. 2. a. To expand, gain: The business grew under new owners.

Grew up | Define Grew up at Dictionary.com
dictionary.reference.com/browse/grew+up
verb (used without object) 1, to increase by natural development, as any living organism or part by assimilation of nutriment; increase in size or substance. 2. to ...

I Never Grew Up
inevergrewup.net
This house of girls (+ our sweet dad) has mastered two very important things: fun and play. We add a magical twist to everything we do—from exploring nature, to ...

Grew | Define Grew at Dictionary.com
dictionary.reference.com/browse/grew
verb simple past tense of grow.

If You Grew Up In The 80s, You're In The Right Place
grewupinthe80s.com
Grew Up In The 80s is the most awesome spot to find classic 80s movies, Horror films, classic comedies, and the most memorable scenes in 80s movies.

votes: 0/2

Jerk not a Jerk

Multimedia gallery
Nominate this person for Jerk of the day
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age: buy / sell
address: buy / sell
city: Choose
zip code: buy / sell
country:

mobile: buy / sell
msn: buy / sell
email: Add

occupation: buy / sell
universities: Add
employer: buy / sell
home phone: buy / sell
work phone: buy / sell
licence plate: buy / sell

myspace: buy / sell
ebay: buy / sell
linked in: buy / sell

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Kauffman Attachment A-69

Jerk :: [redacted] is not a jerk

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votes: 0/2

Jerk

not a Jerk

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age: [buy / sell](#)

address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

msn: [buy / sell](#)

emails: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

licence plate: [buy / sell](#)

myspace: [buy / sell](#)

ebay: [buy / sell](#)

linked in: [buy / sell](#)

Lions at NFL.com

[Team Site](#)

Stats

ighlights, Pictures, Bio ...

Get the latest news, stats, videos, highlights and more about Detroit Lions [on ESPN.com](#).

the free encyclopedia

is an American football [the Detroit](#)

spans cover of 'Madden NFL 13'

revealed as the cover star for Electronic Arts pro football simulation Madden NFL 13 during a broadcast of ESPN's...

ons - NFL - Yahoo! Sports

[sports.yahoo.com/nfl](#)

The latest stats, facts, news and notes

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Home Plate
is not a Jerk

•••

votes: 0 / 2

Jerk

not a Jerk

Multimedia gallery

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address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

msn: [buy / sell](#)

emails: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

reference phone: [buy / sell](#)

myspace: [buy / sell](#)

ahoy: [buy / sell](#)

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Home Plate Baseball & Softball Instruction | Peachtree City GA
[homeplate1.com](#)

Home Plate is a local baseball and softball indoor instructional facility. We offer batting instruction, pitching, throwing, and fielding instruction for all ages (5...

Baseball field - Wikipedia, the free encyclopedia
[en.wikipedia.org/wiki/Home_plate](#)

A baseball field, also called a ball field or a baseball diamond, is the field upon which the game of baseball is played. The terms "baseball field" and "ball field ...

home plate: Definition from Answers.com
[www.answers.com/topic/home-plate](#)

home plate n. Baseball A base, usually consisting of a hard rubber slab, at one of the corners of a diamond at which a b

Home Plate (Mars) - Wikipedia, the free encyclopedia
[en.wikipedia.org/wiki/Home_Plate_\(Mars\)](#)

Home Plate is a plateau roughly 90 m across within the Columbia Hills, Mars. It is informally named for its similarity in shape to a baseball home plate. Home Plate ...

Home Plate Catering
[homeplatesportscater.com](#)

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Kauffman Attachment A-71

Jerk :: [redacted] • is not a jerk

Jerk POST A JERK REMOVE ME SCHOOLS CITIES more v sign in

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[redacted] Journalist, broadcaster, and editor. He writes a weekly column for The

[redacted] Wikipedia, the free encyclopedia

[redacted] editor, and essayist. He

[redacted] ioneered the introduction of energetic

Robert C. Fulford - Wikipedia, the free encyclopedia
en.wikipedia.org/wiki/Robert_C._Fulford
 Robert C. Fulford (1905 - 1997) was a pioneer in the introduction of alternative and energetic medicine in the context of osteopathy. From the nineteen forties, he ...

Eastland Press Books: Robert Fulford, D.O. and the Philosopher ...
www.eastlandpress.com/books/robert_fulford_do_and_the_philosopher
 Robert Fulford, D.O. and the Philosopher Physician Zachary Comeaux Robert Fulford, D.O. (1905-1997) was an important, if enigmatic, figure in late twentieth-century ...

votes: 6/10

Jerk not a Jerk

Multimedia gallery
 Nominate this person for Jerk of the day
 Claim this profile

age: buy / sell
 address: buy / sell
 city: Choose
 zip code: buy / sell
 country:

mobile: buy / sell
 pager: buy / sell
 emails: [input] Add

occupation: buy / sell
 universities: Add
 employer: buy / sell
 home phone: buy / sell
 work phone: buy / sell
 license plate: buy / sell

myspace: buy / sell
 ebay: buy / sell
 linked in: buy / sell

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Kauffman Attachment A-72

FTC-JERK0046495
CX0048-072

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[www.myspace.com](#) [redacted] ") on Myspace
Can't enough New Directions action? Gleek out, sing, an... + Follow. Slipknot

[ok.com/family](#) | Facebook
Facebook users with the last nam [redacted] Search Facebook for more people who share the last nam [redacted]

Jerk :: [redacted] is a jerk [redacted]
[redacted] a jerk or not!

[www.mylife.com/c](#) [redacted] t, TN | MyLife™
See where [redacted] has been since you last spoke. Find old friends and classmates at MyLife™. Find Everyone from Your Past.

--- Docket Pre [redacted] LAW COURT PAGE: 1
[www.bridgeweb.org](#)

votes: 534/67

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Claim this profile

age:

address:

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile:

man: [buy / sell](#)

emails: [Add](#)

occupation:

universities: [Add](#)

employer:

home phone:

work phone:

license plate:

myspace:

city: [buy / sell](#)

linked in: [buy / sell](#)

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Jerk : [redacted] is a jerk

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photos and blog: [Official website](#)
 galleries and videos. Read [\[redacted\]](#) get updated news on the star of the
 he ...

[en.wikipedia.org/wiki/\[redacted\]](#) American businesswoman, television personality,
[\[redacted\]](#)

[\[redacted\]](#) Swore He Was ...

[\[redacted\]](#) Ideo and Gossip - Celebuzz
 California. She is a reality star who has starred in bot [\[redacted\]](#)

[\[redacted\]](#) allege ...

votes: 70/2

[Jerk](#) [not a Jerk](#)

Multimedia gallery
 Nominate this person for Jerk of the day
 Claim this profile

age: [buy / sell](#)
 address: [buy / sell](#)
 city: [Choose](#)
 zip code: [buy / sell](#)
 country:

mobile: [buy / sell](#)
 msn: [buy / sell](#)
 emails: [Add](#)

occupation: [buy / sell](#)
 universities: [Add](#)
 employer: [buy / sell](#)
 home phone: [buy / sell](#)
 work phone: [buy / sell](#)
 licence plate: [buy / sell](#)

myspace: [buy / sell](#)
 ebay: [buy / sell](#)
 linked in: [buy / sell](#)

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Jerk : [redacted] is a jerk

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[redacted] and others you may know. Facebook gives people

[redacted] | LinkedIn

[View](#) [redacted] location Bosnia and

[redacted] Location Bosnia and Herzegovina Industry Automotive

[Songs and Music Videos for Free - bigsong.in](#)
[redacted] videos for free , Free MP3 and Music Video downloads -

votes: 154/0

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Multimedia gallery
Nominate this person for Jerk of the day
Claim this profile

age:
address: [buy / sell](#)
city: [Choose](#)
zip code: [buy / sell](#)
country:
mobile:
man: [buy / sell](#)
emails: [Add](#)

occupation: [buy / sell](#)
universities: [Add](#)
employer: [buy / sell](#)
home phone: [buy / sell](#)
work phone: [buy / sell](#)
licence plate: [buy / sell](#)
myspace: [buy / sell](#)
skype: [buy / sell](#)
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Jerk : [redacted] is a jerk

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[Online](#) [About](#) [Character](#)

[redacted] and others you may know. Facebook

[redacted] klopedia, the free encyclopedia
served voluntarily in the [redacted] (Corporal/Sergeant) in World War II, who

[redacted] Intelius.com
[redacted] Milwaukee,

[redacted] -Mail, Adresse, Telefonnummer und ...
[redacted] must Email Adressen, Telefonnummern, Biographie [redacted]

[redacted] rom

votes: **430/6**

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Multimedia gallery
Nominate this person for Jerk of the day
Claim this profile

age: [redacted]
address: [redacted]
city: **Kaufering** [\[change\]](#)
zip code: [redacted]
country: **Germany**

mobile: [buy](#) / [sell](#)
mbr: [buy](#) / [sell](#)
twitter: [redacted] [Add](#)

occupation: [buy](#) / [sell](#)
universities: [Add](#)
employer: [buy](#) / [sell](#)
home phone: [buy](#) / [sell](#)
work phone: [buy](#) / [sell](#)
licence plate: [buy](#) / [sell](#)

myspace: [buy](#) / [sell](#)
ebay: [buy](#) / [sell](#)
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Currently, we provide support in English. Please use a supported language when contacting us.

Please be as specific as possible in the message you enter below.

Note: If you want to remove your profile, [click here](#)

Subject:

Ex: [How can I change my profile information?](#)

Profile URL:

Your profile link

Enter email address:

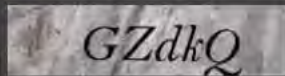
Ex: jsmith@example.com

Additional Information (description, urls):

Please use 1,000 characters max

- Feedback
- Report Abuse

[Reset captcha](#)



Anti-bot verification

If you are not [logged in](#) there is a service charge of \$25 for support. This charge is refundable at our sole discretion.

Card Number

CVC

Expiration

 /

Amount

[Submit](#)

Kauffman Attachment A-77

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CX0048-077

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[SCHOOLS](#)
[CITIES](#)
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Copyright Tips

What is copyright? Copyright is a form of protection provided for original works of authorship, including literary, dramatic, musical, graphic and audiovisual creations. "Copyright" literally means the right to copy, but has come to mean that body of exclusive rights granted by law to copyright owners for protection of their work.

What is copyright infringement? Copyright infringement occurs when a copyrighted work is reproduced, distributed, performed, publicly displayed, or made into a derivative work without the permission of the copyright owner.

Posting copyright-infringing content can lead to the termination of your account, and possibly monetary damages if a copyright owner decides to take legal action (this is serious—you can get sued!). Below are some guidelines to help you determine whether your photo text or video is eligible or whether it infringes someone else's copyright.

As a general matter, we at Jerk respect the rights of artists and creators, and hope you will work with us to keep our community a creative, legal and positive experience for everyone, including artists and creators.

Copyright Infringement Notification

To file a copyright infringement notification with us, you will need to send a written communication that includes substantially the following (please consult your legal counsel or see Section 512(c)(3) of the Digital Millennium Copyright Act to confirm these requirements):

- i. A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
- ii. Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works at that site.
- iii. Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit the service provider to locate the material. Providing URLs in the body of an email is the best way to help us locate content quickly.
- iv. Information reasonably sufficient to permit the service provider to contact the complaining party, such as an address, telephone number, and, if available, an electronic mail address at which the complaining party may be contacted.
- v. A statement that the complaining party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.
- vi. A statement that the information in the notification is accurate, and under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

To expedite our ability to process your request, such written notice should be sent to our designated agent via our online copyright complaint form below. You will need a Jerk account in order to utilize this tool.

[Copyright Complaint Webform](#)

If you would prefer to contact us by mail please send your mail to:

DMCA Complaints
Jerk LLC

16192 Coastal Hwy. Lewes, DE 19958
USA

Please note that under Section 512(f) any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages. Don't make false claims!

Kauffman Attachment A-80

Please also note that the information provided in this legal notice may be forwarded to the person who provided the allegedly infringing content.

Claimant information will be published on the Jerk site in place of disabled content.

Counter-Notification

If you elect to send us a [counter notice](#), please go to our Counter Notice to access the instructions.

Please note that under Section 512(f) of the Copyright Act, any person who knowingly materially misrepresents that material or activity was removed or disabled by mistake or misidentification may be subject to liability. Please also be advised that we enforce a policy that provides for the termination in appropriate circumstances of subscribers who are repeat infringers.

Kauffman Attachment A-81

FTC-JERK0046504
CX0048-081

Jerk

[POST A JERK](#)

[REMOVE ME](#)


[SCHOOLS](#)

[CITIES](#)

[more](#) ▾

[sign in](#)

Find a Person, an University, or a City

search 

Account Information
(Please enter your real information in the form below.)

First Name:*	M.I.:	Last Name:*
<input type="text"/>	<input type="text"/>	<input type="text"/>
Email:*		
<input type="text"/>		
Street Address:*		
<input type="text"/>		
City:*		
<input type="text"/>		
State/Region:	Postal Code:*	
Massachusetts	<input type="text"/>	
Country:		
United States		
Phone Number:*		
<input type="text"/>		

WARNING: If your email address belong to hotmail, you could receive your password into your mail junk folder.

[Register](#)

* These fields are required

Kauffman Attachment A-82

FTC-JERK0046505
CX0048-082

CX0049

**MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY**

(See CX0049 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0050
MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY

(See CX0050 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0051

MARKED CONFIDENTIAL



[Redacted]

Account Number XXXX-XXXX-XX [Redacted]	Payment Date 07/10/2012	New Balance \$0.00	Total Amount Due \$0.00	Enter Amount Paid [Redacted]
---	----------------------------	-----------------------	----------------------------	---------------------------------

[Redacted]

CITIBANK
P.O. BOX 183173
COLUMBUS, OH
43218-3173

For a credit balance refund, or a telephone or address change, please place an X in the parentheses () and make the desired changes on the reverse side. Thank you.

Payment coupon: Please tear along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK CORPORATE CARD

Statement Date
06/15/12

Payment Date
07/10/12

Previous Balance	Payments and Credits	New Charges	New Balance	Credit Line
\$0.00	\$0.00	\$0.00	\$0.00	\$3,000

For customer service call or write 1-800-248-4553 P.O. Box 6125 Sioux Falls, SD 57117

Send payments to: Citibank P.O. Box 183173 Columbus, OH 43218-3173

Account Number XXXX-XXXX-XX [Redacted]	Cash Advance Limit* \$00	Available Credit Line \$3,000	Available Cash Line** \$00
---	-----------------------------	----------------------------------	-------------------------------

Sale Date	Post Date	Reference Number	Type of Activity	Amount
-----NOTICE MEMO ITEMS LISTED BELOW-----				
05/16	05/18	24492152138837004942056	JERK LLC JERK.COM MA	30.00
[Redacted]				
TOTAL AMOUNT OF MEMO ITEM(S):				490.95

ACCOUNT SUMMARY		Previous Balance	Payments	Credits	Purchases and Advances	Interest Charges	New Balance
CURRENT PERIOD							
Purchases		0.00					0.00
Advances		0.00					0.00
TOTALS		0.00					0.00

DAYS IN BILLING PERIOD: 31		<u>Purchases</u>	<u>Cash Advances</u>	Payment Due:	.00
Balance Subject To Interest Charges	>	.00	.00	Amount Over Credit Limit:	.00
Periodic Rate	>	.0000%	.0000	Amount Past Due:	.00
ANNUAL PERCENTAGE RATE	>	.000%	.0000	MINIMUM AMOUNT DUE:	.00

*Cash Advance Limit is a portion of your Total Credit Line
** Available Cash Line is a portion of your Available Credit Line

Kauffman Attachment D
FTC-JERK0046508
CX0051-001

CX0053
MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY

(See CX0053 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0054

MARKED CONFIDENTIAL



[Redacted]

<i>Account Number</i> XXXX-XXXX-X	<i>Payment Date</i> 06/09/2012	<i>New Balance</i> \$0.00	<i>Total Amount Due</i> \$0.00	<i>Enter Amount Paid</i>
--------------------------------------	-----------------------------------	------------------------------	-----------------------------------	------------------------------



CITIBANK
P.O. BOX 183173
COLUMBUS, OH
43218-3173

For a credit balance refund, or a telephone or address change, please place an X in the parentheses () and make the desired changes on the reverse side. Thank you.

Payment coupon: Please tear along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK CORPORATE CARD

Statement Date
05/15/12

Payment Date
06/09/12

<i>Previous Balance</i>	<i>Payments and Credits</i>	<i>New Charges</i>	<i>New Balance</i>	<i>Credit Line</i>
\$0.00	\$0.00	\$0.00	\$0.00	\$3,000

For customer service call or write 1-800-248-4553 P.O. Box 6125 Sioux Falls, SD 57117

Send payments to: Citibank P.O. Box 183173 Columbus, OH 43218-3173

<i>Account Number</i>		<i>Cash Advance Limit*</i>	<i>Available Credit Line</i>	<i>Available Cash Line**</i>
XXXX-XXXX		\$00	\$3,000	\$00
<i>Sale Date</i>	<i>Post Date</i>	<i>Reference Number</i>	<i>Type of Activity</i>	<i>Amount</i>
*****NOTICE MEMO ITEMS LISTED BELOW *****				
[Redacted]				
05/11	05/14	24492152133637003330597	JERK LLC JERK.COM MA	25.00
05/11	05/14	24492152133637003346015	JERK LLC JERK.COM MA	25.00
***** TOTAL AMOUNT OF MEMO ITEM(S):				532.64

CX0064

**MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY**

(See CX0064 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0065

**MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY**

(See CX0065 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0066

**MARKED CONFIDENTIAL
VIDEO**

REDACTED IN ITS ENTIRETY

(See CX0066 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0067

**MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY**

(See CX0067 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0068

**MARKED CONFIDENTIAL
VIDEO**

REDACTED IN ITS ENTIRETY

(See CX0068 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0069

**MARKED CONFIDENTIAL
VIDEO**

REDACTED IN ITS ENTIRETY

(See CX0069 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0070

**MARKED CONFIDENTIAL
VIDEO
REDACTED IN ITS ENTIRETY**

(See CX0070 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0091

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(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0119

MARKED CONFIDENTIAL

06/17/2014 12:59 4158832488

PAGE 23/58

JD,

From: "John Fanning" <john@netcapital.com>
Subject: jerk.com
Date: June 7, 2009 10:09:06 AM PDT
To: "Joe Abrams" <jabrams@toolworks.com>

Joe,
Below are the wiring instructions for jerk.com. I will send you a certificate for 10% ownership on a fully diluted basis. I have a form for the LLC agreement which we will use which I will forward as well. Our intention is to convert to a C corp. at some point early on, possibly during series A. At that point we will all have founders shares, and the Series A investors will get preferreds.

john

Jerk LLC Wiring Instructions
Wire to:
Bank of America
132 N. Broadway St., Wichita, KS 67202-2104
ABA: [REDACTED]
Jerk LLC
Account Number [REDACTED]

John W Fanning
Chairman Netcapital
john@netcapital.com
781-925-1600 Direct
650-814-8800 Cell

FTC-JERK0001593
CX0119-001

CX0237

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0238

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0240

MARKED CONFIDENTIAL REDACTED IN ITS ENTIRETY

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0241

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0242

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0243

MARKED CONFIDENTIAL REDACTED IN ITS ENTIRETY

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0244

**MARKED CONFIDENTIAL
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(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0245

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0246

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0247

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0259

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Like-New Girls Jeans

All Your Favorite Brands & Styles Incredible Variety & up to 75% Off
[thredup.com](#)

80s Costumes - Cheap

Get Great Deals on 80s Costumes. Skirts, Leg Warmers and Much More!
[www.NextTag.com/80s-Costume](#)

Local Coupons

1 ridiculously huge coupon a day. Get 50-90% off your city's best!
[www.Groupon.com](#)

Ärzte fragen: Lymphknoten

8 Ärzte sind gerade online. Stellen Sie jetzt Ihre Frage!
[Arzt.JustAnswer.de](#)

[redacted]

[redacted] is not a Jerk

Recommend this on Google

Do you think [redacted] is independent?

Agree

Disagree



votes: 2/1

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: 15

address: buy / sell

city: Trail [change]

zip code: buy / sell

country: Canada

mobile: buy / sell

msn: buy / sell

emails: [redacted]

Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

Find a Person, an University, or a City

search

You have an error in your SQL syntax; check the manual that corresponds to your MySQL server version for the right syntax to use near 's_Kollektion_Black_Is_Back_2009_03-Q-Levi's-k.jpg' at line 1

[redacted] Boston MA 02116, (617 ...

[redacted] to the design of buildings and spaces

LinkedIn

[redacted] businesses since before I could reach the kitchen counter. My

[redacted] would be delighted if

you mistook it for chamber ...

[redacted] an over-achievement problem. You haven't heard of him? You will..."

Identify People Search Database

Anonymous - 41 days ago Dispute 0 [thumbs up] [thumbs down] 0
[redacted] um... Someone put me on here for some reson. I think someone hates me?
XD

Anonymous - 41 days ago Dispute 0 [thumbs up] [thumbs down] 0
[redacted]. Someone put me on here for some reson. I think someone hates me?
XD

Anonymous - 41 days ago Dispute 0 [thumbs up] [thumbs down] 0
[redacted] Someone put me on here for some reson. I think someone hates me?
XD

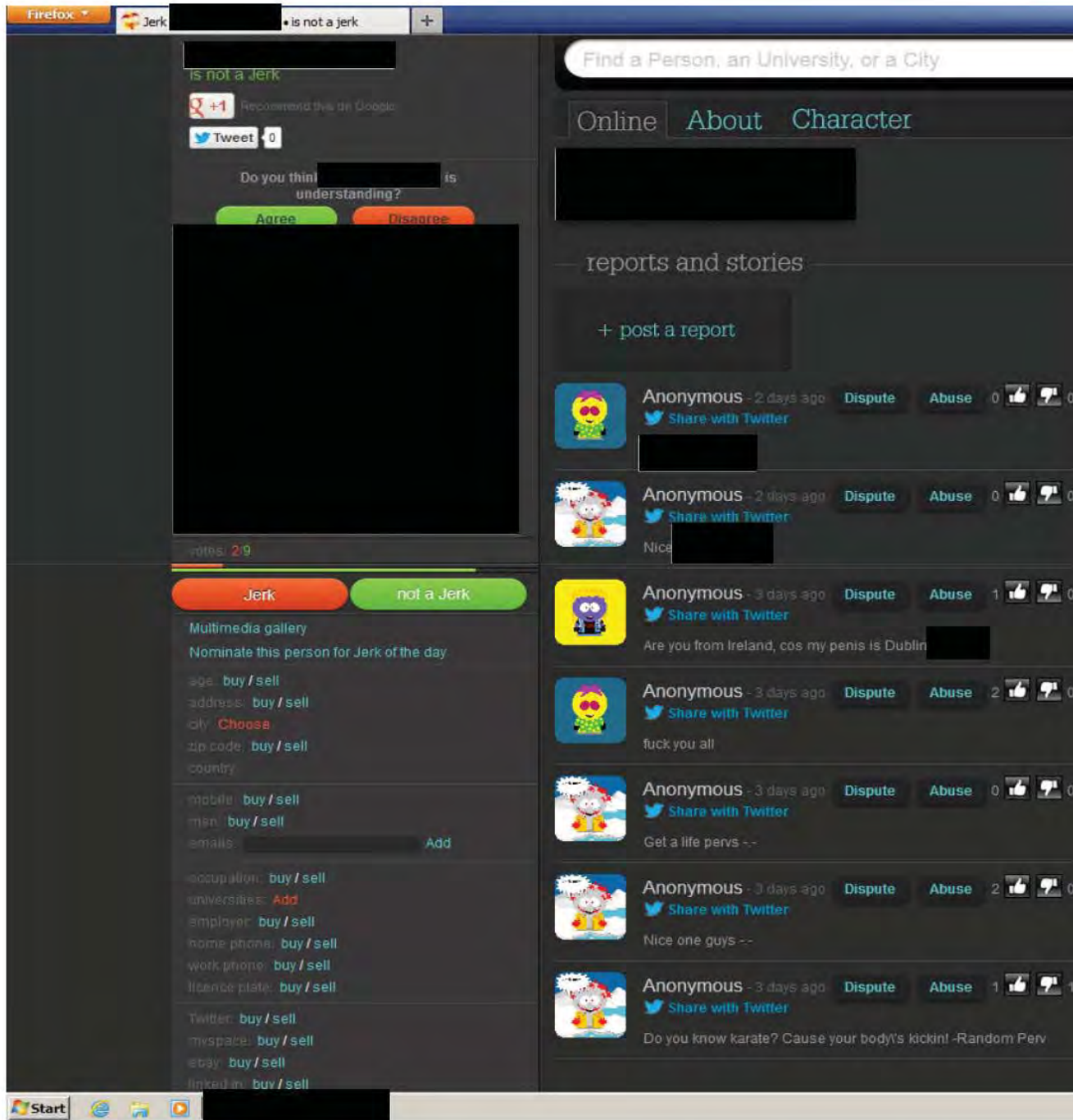
Anonymous - 41 days ago Dispute 0 [thumbs up] [thumbs down] 0
[redacted] Someone put me on here for some reson. I think someone hates me?
XD

Jerk :: [REDACTED] is a jerk

[http://www.jerk.com/\[REDACTED\].html](http://www.jerk.com/[REDACTED].html)

linked in: [buy / sell](#)

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Welcome to PayPal

The faster, safer, easier way to pay and get paid. Sign up now.
www.PayPal.com

OSHA Safety

Keep Your Employees Safe & Up To Date On OSHA Industry Standards!
www.safetyservicescompany.com

Official Ford Site

Compare a 2012 Ford Expedition. Capable, Comfortable & Powerfull
Ford.com/Expedition



Recommend this on Google

Do you think [redacted] is a jerk?

Agree Disagree



votes: 7/0

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: 11

address: relaxxxx bazdighii

city: Choose

zip code: azama

country:

mobile: [redacted]

msn: [redacted]

emails [redacted] Add

occupa ion: fotograf syaoo

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

Find a Person, an University, or a City



Craftsvilla.com

The Most Unique Indian Jewellery Global Shipping



search



shot his mother



genocide

his

Cin [redacted] IMDb

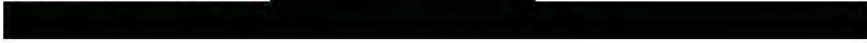


LinkedIn

Pipelines HSE

Orange Revolution Is in Store for Russia « Therearenosunglasses ...

therearenosunglasses.wordpress.co



Anonymous - 181 days ago Dispute 0

tyapp pedik

Get Our News, Everywhere!

Jerk

POST A JERK REMOVE SCHOOLS CITIES more sign in

Find a Person, an University, or a City search

Online About Character

reports and stories

+ post a report

Anonymous - 76 days ago Dispute 1 0 Share with Twitter
I hear he tried to shove a hotdog up his vagina and he put it to far up and the paramedics came to remove it

Anonymous - 76 days ago Dispute 1 0 Share with Twitter
He tried to touch ma penis.

Anonymous - 76 days ago Dispute 1 0 Share with Twitter
circle jerking faggot

votes: 10/14

Jerk not a Jerk

Multimedia gallery
Nominate this person for Jerk of the day
Claim his profile

age: 16
address: buy / sell
city: Pietermaritzburg [change]
zip code: faggo
country: South Africa

mobile: buy / sell
msh: buy / sell
emails: [redacted] Add

whatsapp: sucking cocks
universities: Add
employer: buy / sell
home phone: buy / sell
work phone: buy / sell
licence plate: buy / sell

Twitter: buy / sell
myspace: buy / sell
ebay: buy / sell
linked in: buy / sell

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Official Ford Site

Great to Look at, Better to Drive. Read SUV Reviews @ Ford.com.
www.ford.com/suvs

What's Your GT Worth?

Free Online Valuation. Fast Payment Sell Your GT Fast, Safe, Fair
www.webuyanycar.com/ford-gt

Ascot Diamonds in DC

DC's Premier Source for Quality Diamond Engagement Rings
www.ascotdiamonds.com

Honda July 4 Sales Event

Enjoy 0.9% APR on 2012 Honda Accord for Well-Qualified Buyers till 7/9!
www.honda.com/ford_fusion

[redacted]
[redacted] is not a Jerk

Recommend this on Google

Do you thin [redacted] is pleasure-seeking?

Agree Disagree

[redacted]

votes: 0/5

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails:

Add

occupa ion: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

Find a Person, an University, or a City

search



We Purchase Diamonds



Pampillon
202-363-6301

[redacted]

more pictures

Wikipedia, the free encyclopedia

[redacted]

[redacted]

This Is It (2006) · The Man in the Silo (2008)

Facebook

[redacted] Facebook

Experience: Hometown: Chillicothe, IL

Biography

[redacted]

Anonymous - 147 days ago

Dispute 1 0

Hey [redacted] you're not a jerk!!!

Anonymous - 147 days ago

Dispute 1 0

Hey [redacted] you're not a jerk!!!

Anonymous - 147 days ago

Dispute 1 0

Hey [redacted] you're not a jerk!!!

Anonymous - 147 days ago

Dispute 1 0

Hey [redacted] you're not a jerk!!!

Anonymous - 147 days ago

Dispute 1 0

Hey [redacted] you're not a jerk!!!

SSIS Replacement

Tired of SSIS Inflexibility? Try Centerprise - The .NET ETL
www.astera.com/centerprise

Catch Him Cheating On You

1) Enter His Email Address 2) See Hidden Pics & Social Profiles Now!
Spokeo.com/Find-Cheaters

Certified Pre Owned Focus

The low-mileage pre-owned Ford Focus you want. Certified.
ford.com/certified-used

[redacted]
is a Jerk

Recommend this on Google

Do you think [redacted] is interrupting?

Agree Disagree



votes: 6/1

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted]

Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

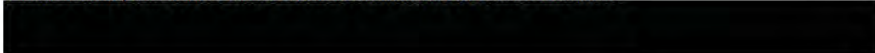
Find a Person, an University, or a City

search



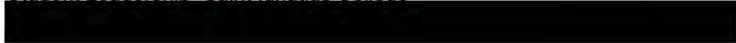
more pictures

Field-Testing the WHO Child Growth Standards in Four Countries



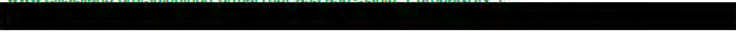
e scolastico Classe 5ª A Di

Student Leadership- Saint Ignatius College



Ellis Island - FREE Port of New York Passenger Records Search

www.ellisland.nm/shipping/FormalTripPass.asp?sship=Europa&RN=P



Anonymous - 11 days ago Dispute 0 likes 0 dislikes
loves the German sausage

Anonymous - 64 days ago Dispute 0 likes 0 dislikes
[redacted] voz ere

Anonymous - 425 days ago Dispute 2 likes 0 dislikes
wishes she was as kool as rossi!!!

Anonymous - 425 days ago Dispute 0 likes 0 dislikes
Def's a jerk

Anonymous - 425 days ago Dispute 0 likes 0 dislikes
Carmela is such a jerk and im nominating her for jerk of the year.....

Anonymous - 425 days ago Dispute 0 likes 0 dislikes
HA!sr,gjhABESLIFUOAHE:FUO

Jerk :: [REDACTED] • is a jerk

[http://www.jerk.com/\[REDACTED\].html](http://www.jerk.com/[REDACTED].html)

linked in: [buy / sell](#)

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Get Pricing on a Ford F-150. Compare the F-150 at Ford.com.
www.Ford.com/F150

What's Your Ranger Worth?

Free Online Valuation. Fast Payment Sell Your Ranger Fast, Safe, Fair
www.webuyanycar.com/ford-ranger

Firefighting Courses

Take Firefighting Classes Online or Nearby - Start This Summer!

www.CampusExplorer.com/Firefighter

Toyota Cars Official Site

New Toyota Cars in Your Area. Search by Zip Code, City or Dealer!
www.BuyAToyota.com



Recommend this on Google

Do you think [REDACTED] is fair?

Agree Disagree



votes: 0/5

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

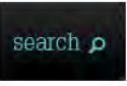
licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

Find a Person, an University, or a City



Ford® Vehicle Deals

Find Your Local Ford Dealer for Limited-Time Offers Now!
www.MidAtlanticFordDealers.com



You have an error in your SQL syntax; check the manual that corresponds to your MySQL server version for the right syntax to use near 'Malley.jpg' at line 1

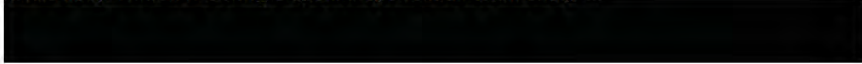
[REDACTED] cLane Black Lake Fire Dept.

[REDACTED] to the meeting agenda. Councilme [REDACTED]

[REDACTED] | Facebook



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is not a Jerk

Recommend this on Google

Do you think [redacted] is honest?

[redacted]

votes: 0/0

Multimedia gallery

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Claim his profile

age: [buy / sell](#)

address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country: [buy / sell](#)

mobile: [buy / sell](#)

msh: [buy / sell](#)

email: [\[redacted\]](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

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— reports and stories

+ post a report

votes: 0/2

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 address: [buy / sell](#)
 city: [Choose](#)
 zip code: [buy / sell](#)
 country:

mobile: [buy / sell](#)
 msn: [buy / sell](#)
 emails:

occupation: [buy / sell](#)
 universities: [Add](#)
 employer: [buy / sell](#)
 home phone: [buy / sell](#)
 work phone: [buy / sell](#)
 licence plate: [buy / sell](#)

Twitter: [buy / sell](#)
 myspace: [buy / sell](#)
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[redacted]
is not a Jerk

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Do you think [redacted] s dependent?



votes: 0/12

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address: [buy](#) / [sell](#)

city: [Choose](#)

zip code: [buy](#) / [sell](#)

country:

mobile: [buy](#) / [sell](#)

msn: [buy](#) / [sell](#)

emails:

occupation: [buy](#) / [sell](#)

universities: [Add](#)

employer: [buy](#) / [sell](#)

home phone: [buy](#) / [sell](#)

work phone: [buy](#) / [sell](#)

licence plate: [buy](#) / [sell](#)

myspace: [buy](#) / [sell](#)

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Do you think [redacted] suspicious?

Agree Disagree



votes: 5/2

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Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

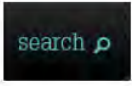
licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

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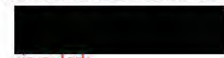
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[redacted] is a Jerk

Recommend this on Google

Do you think [redacted] is kind?

Agree Disagree



votes: 0/0

Jerk not a Jerk

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Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

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[redacted] s : 36 Tabs Total @ Ultimate-Guitar.Com

[redacted] p tabs including I Knew You Before, Blood Wine, Blanket

Pistol Chords by [redacted] Ultimate-Guitar.Com

[redacted] tabbed by Thrice

Nebraska Chords by [redacted] @ Ultimate-Guitar.Com

[redacted] tabs - (4 guitar tabs)

[redacted] songs in Tab Pro score player

[redacted] Ultimate-Guitar.Com

[redacted] m and guitar pro tabs including Cowboys And Angels

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Do you think [redacted] is loyal?

— reports and stories

+ post a report

votes: 0/0

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 Nominate this person for Jerk of the day
 Claim his profile

age: buy / sell
 address: buy / sell
 city: Choose
 zip code: buy / sell
 country:

mobile: buy / sell
 msn: buy / sell
 emails: Add

occupations: buy / sell
 universities: Add
 employer: buy / sell
 home phone: buy / sell
 work phone: buy / sell
 license plate: buy / sell

Twitter: buy / sell
 myspace: buy / sell
 ebay: buy / sell
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Do you think [redacted] is appreciative?

Agree Disagree

[redacted]

votes: 0/7

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Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

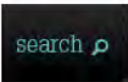
licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

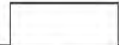
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Online Race Results | Race Details

onlineraceresults.com/event/view_event.php

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... Visi [redacted] earch Garrett, IN ...

RunnersWorld Tulsa - Join Hands Day - Race Results

www.runnersworldtulsa.com/gettraceresults

CITY, STATE, AGE, GUNT ME, PACE M [redacted] Cashion OK 26:47 5:22 2 6 6

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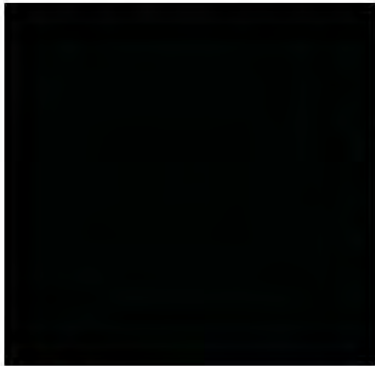
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Do you think [redacted] is respectful?

Agree Disagree



votes: 0/0

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Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

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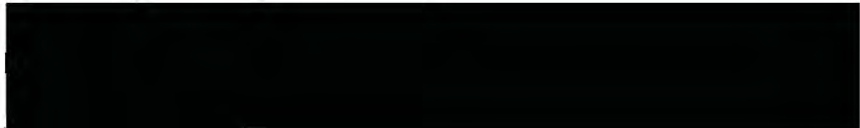


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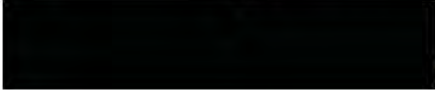


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ors.



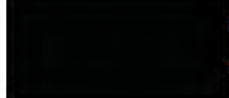
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ccountant in January 1999. He is a member of the



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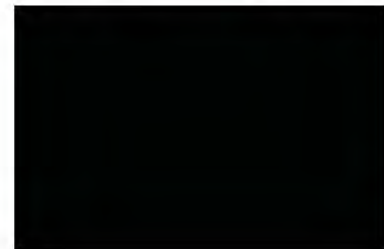
[redacted]
is not a Jerk

Recommend this on Google

Do you think [redacted] is creative?

Agree

Disagree



votes: 0/0

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age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

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[redacted]

[redacted] courses I teach for Arkansas State

[redacted] accounting MBA 1994 Memorial

[redacted] s. North Carolina Lighthouse

[redacted] Cityscapes. North Carolina

[redacted] Baca Landata.

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city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

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address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

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address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

Twitter: buy / sell

myspace: buy / sell

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votes: 0/0

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address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

msn: [buy / sell](#)

emails: [Add](#)

occupation: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

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age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

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votes: 0/0

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Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

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votes: 0/0

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Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

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myspace: buy / sell

ebay: buy / sell

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Do you thin [redacted] is nice?

votes: 0/8

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 Claim his profile

age: 15
 address: buy / sell
 city: Choose
 zip code: 88450
 country:

mobile: buy / sell
 msn: buy / sell
 aol: Add

occupation: buy / sell
 universities: Add
 employer: buy / sell
 home phone: buy / sell
 work phone: buy / sell
 licence plate: buy / sell

Twitter: buy / sell
 myspace: buy / sell
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[redacted]

[redacted] is not a Jerk

Recommend this on Google

Do you think [redacted] caring?

Agree Disagree

[redacted]

votes: 1/12

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupa ion: buy / sell

universities: Add

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work phone: buy / sell

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HES NOT A JERK U IDIOTS!!

Anonymous - 69 days ago Dispute 2 0
[redacted] is the coolest guy i know he helps me through hard times and is always there for me. He stands up for others and never talks about me behind my back.

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Do you think [redacted] is uncon...

votes: 0/5

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age: buy / sell
 address: buy / sell
 city: Albuquerque [change]
 zip code: buy / sell
 country: New Mexico

mobile: buy / sell
 msn: buy / sell
 email: [redacted]

occupation: buy / sell
 universities: Eastern New Mexico University
 employer: buy / sell
 home phone: buy / sell
 work phone: buy / sell
 license plate: buy / sell

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[USAmarker.com](#)

Simple Insure

P&C Policy Admin Systems Quote, Rate & Issue

[simpleinsure.cloudaccess.net](#)

Private High School in VA

Take The Lead In Your Childs Future Surround Them With Knowledge!

[Cortona-Virginia.com/HighSchool!](#)



Recommend this on Google

Do you think [redacted] is responsible?

Agree

Disagree



votes: 2/0

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: 50 way street

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted]

Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

Find a Person, an University, or a City

search

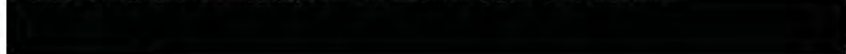
Make Your Marketing Happen. AUTOMATICALLY.

Infusionsoft.



... reserved.

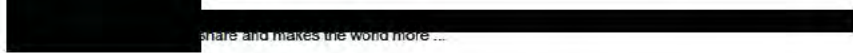
Family Tree Maker's Genealogy Site: User Home Pages: La Famiglia



villages, FL | MyLife™



facebook



share and makes the world more ...



Anonymous - 73 days ago Dispute 1

http:// [redacted]



Anonymous - 92 days ago Dispute 13



Anonymous - 92 days ago Dispute 12

Hahahaha yeah that guy is a grade A scum bag I'd hate to be his friend he rips people off behind their backs and pretends to be their mate, In my eyes he is the ultimate drug fucked loser



Anonymous - 92 days ago Dispute 11

[redacted] ALL THEIVING BITCH



Anonymous - 92 days ago Dispute 11




DRUG ADDICTED SCUMBAG CROATIAN









Anonymous - 92 days ago Dispute 12




PEICE OF SHIT DRIG ADDICT SCUM OWNS A BUSINESS CALLED [redacted] WILL ONLY TRY TO RIP YOU OFF LIKE THE DOG HE IS




linked in: buy / sell


 Anonymous - 92 days ago [Dispute](#) 11   1
 FUCKING CROAT SCUM!! PUTS DRUGS IN HIS ARMS AND STEALS FROM HIS FRIENDS TO PAY FOR IT!!

 Anonymous - 92 days ago [Dispute](#) 12   0
 Croatian fuckig theif Th [redacted] family are a pack of croat dogs that love sucking serb cock Also the [redacted] APOSTOLOS
 FAGGOT PEICE OF TRASH WITH A LIL SLUT OF A DAUGHTER FUCKIN [redacted]
 IS A FAGGOT CROAT CHETNIK PEICE OF SHIT TOO, BURN THE CUNTS AT A STAKE I SAY
 HAHHAHAHAHA

 Anonymous - 114 days ago [Dispute](#) 5   0
 [redacted] ves sucking on mongol gypsy dick.. hats why he still hangs around toly even though he knows toly ripped him off.. i bet danny would like to get his mouth on that dick too

 Anonymous - 116 days ago [Dispute](#) 7   0
 hey my nam [redacted] and ill talk shit about how hard i am.. even though me and my sister [redacted] re still sucking toly [redacted] dicks.. the fact that joe knows full well that toly sold he stuff they stole together and still hangs out with him proves th [redacted] re a pack of fags.. atleast the minute i knew prokos and kovacevs stole from me they had to run off like little faggots and dribble shit from a distance.. but not joe.. he'll hang out with he people who ripped him off wont you joe? hanging out with toly an [redacted] after they ripped you off makes your family look like a pack of gypsy cock lovers. [redacted] must love looking like a retard talking shit about people ripping me off when his family is still sucking the dick and hanging out with the people who stole from his family :) hypocri ical much you fuckhead? oh by he way im sure your little retarded brain cant understand what im writing anyway

 Anonymous - 116 days ago [Dispute](#) 6   0
 [redacted] rother had to change his phone number [redacted] A 5095 because deep down [redacted] family are a pack of faggots.. yeah they talk real hard after stealing from your house but when you start abusing his parents and family they just change their numbers instead of growing a dick and coming down to fight someone face to face.. remembe [redacted] really hard when your back is turned.. and hes really hard when hes dribbling shit.. but when he knows he got caught he'll run off like the lit le bitch we all know he is.. he has some sick fucked up mental issues to get enjoyment out of breaking other peoples shit.. I think his daddy used to beat him up when he was a little baby.. thats why hes so fucked in the head today.. isnt that righ [redacted] if thats not the case then explain to us why else you find it funny to break parts off of peoples cars.. I bet the dickheads your hanging around today dont even know about how you fucked up their carseats or mirros allready isnt hat rite [redacted] ou fucked up retard.. go repeat 7th grade again you fuckn moron

 Anonymous - 389 days ago [Dispute](#) 1   6
 DUMBBITCH YOU FUCKN FAGGOT WHO THE FUCK DO YOU THINK YOU ARE

Proxy To Unblock Sites

Access Any Blocked Site From Anywhere. 100% Free. Download Now!
www.Hashelo.com

Is He Cheating On You?

1) Enter His E-Mail Address 2) See Hidden Pics & Social Profiles Now!
Spokeo.com/Cheating-Spouse-Search

Walden University Online

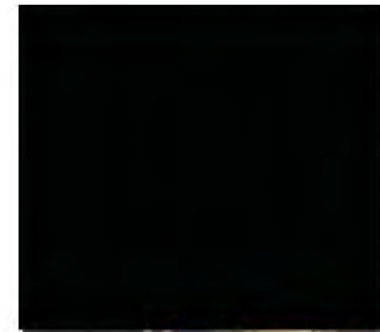
Doctoral, Master's and Bachelor's. An Accredited Online University.
Walden.edu

Job Openings

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Recommend this on Google



votes: 236/138

Multimedia gallery

Nominate this person for Jerk of the day

age: 7989

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: [redacted]

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

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search



Support the American Red Cross.

American R

CLH



more pictures

Facebook

nd others you may know. Facebook gives people

LinkedIn

aka iehelms

15 year accounts receivable professional who has managed up to 13 specialist. I have written and procedures for Japanese ...

on Myspace

www.myspace.com/

leading social entertainment destination powered by the passion of our

LinkedIn

is professional profile on LinkedIn. Experience: Regional Manager, Riverstone Residential Group; Summit Properties.

Jerk :: [redacted] is a jerk

www.jerk.com

is a jerk or not!

Anonymous - 749 days ago Dispute 0 thumbs up 0 thumbs down

[redacted] is sexy

Anonymous - 782 days ago Dispute 0 thumbs up 0 thumbs down

[redacted] is a bitch
just keeps sucking dick
will end up sucking dick
can suck some good dick
can't stop sucking dick
as

[redacted] - 786 days ago Dispute 0 thumbs up 0 thumbs down

I Suck DICK and i like is a shit face saint
I Suck DICK and i like just bated
I Suck DICK and i like will fuck me
I Suck DICK and i like can suck cock
I Suck DICK and i like can't eat dick
ugly ass saint bitch

Anonymous - 800 days ago Dispute 0 thumbs up 0 thumbs down

Nice shoes lets fuck

Anonymous - 801 days ago Dispute 0 thumbs up 0 thumbs down

[redacted] is a fucked ass bitch a tucked ass bitch

[REDACTED]

Anonymous - 802 days ago [Dispute](#) 1 1
[REDACTED] is a fucking skanky ass cunt bag whore
just can go fucking slaughter her self
will suck my fucking cock
can fucking die
can't do shit shes sooo fucking ugly you CUNT!!

Anonymous - 816 days ago [Dispute](#) 0 1
yhur a lil terd squad u shut nd dont talk 2 me again signed yhur best freind i heard what u said about
me sike i dont even know who u r lol

Anonymous - 819 days ago [Dispute](#) 0 0
gdh dbswhbdu h

Anonymous - 820 days ago [Dispute](#) 0 0
dhont worry bhout wat ppl. say bhut yhu ah dick sucker.

Anonymous - 824 days ago [Dispute](#) 0 0
are you ready to *uck lol

Anonymous - 829 days ago [Dispute](#) 0 0
BITCH

Anonymous - 829 days ago [Dispute](#) 0 0
you are a BITCH fuck you!!

Anonymous - 831 days ago [Dispute](#) 0 0
u look a lil bit hyperish..... u look like a freakin gaay ass faget

Anonymous - 831 days ago [Dispute](#) 0 0
you are ugly

Anonymous - 831 days ago [Dispute](#) 0 0
UR A SLUT WHORE BYTCH

Anonymous - 832 days ago [Dispute](#) 0 0
hi

Anonymous - 833 days ago [Dispute](#) 0 0
Jerk


Anonymous - 834 days ago [Dispute](#) 0 0
yu look stankin

Anonymous - 834 days ago [Dispute](#) 0 0
weird. a lil


Anonymous - 834 days ago [Dispute](#) 0 0
your ugly as shit, not even your parents love no one loves you your adopted i hope that guy down there
does hit you with his.....TRUCK

[REDACTED]

-  Anonymous - 835 days ago [Dispute](#) 3   4
i would hit her...wi h my truck

-  Anonymous - 836 days ago [Dispute](#) 0   0
a bitch


-  Anonymous - 839 days ago [Dispute](#) 0   0
u ugly ass bitch u fkin country girl ya need to stop bafor she start cryin

-  Anonymous - 839 days ago [Dispute](#) 0   1
u ugly ass bitch u fkin country girl ya need to stop bafor she start cryin

-  Anonymous - 839 days ago [Dispute](#) 0   0
You are a goddamn fucking bitch. Nobody in 'heir right ming would love you


-  Anonymous - 844 days ago [Dispute](#) 2   2
Bltch

-  Anonymous - 864 days ago [Dispute](#) 0   0
just plain ugly nothin more i dont want to hurt her any more than these assholes did!!!

-  Anonymous - 866 days ago [Dispute](#) 2   3
how does it feel to be hated hmmm.

-  Anonymous - 866 days ago [Dispute](#) 1   3
SEEEEXY <333333

-  Anonymous - 869 days ago [Dispute](#) 1   3
ur a bitch mo her fucker ha

-  Anonymous - 877 days ago [Dispute](#) 4   8
ulgy bitchhow can suck my dik ard ho h no stut

-  Anonymous - 879 days ago [Dispute](#) 10   13
ugly ass saint bitch

-  Anonymous - 890 days ago [Dispute](#) 11   15
I THINK UR AN UGLY ASS SAINT SKANK ASS TRIFLIN BYTCH

-  Anonymous - 892 days ago [Dispute](#) 10   13
hey

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About

Character

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+ post a report

is not a Jerk

Tweet



votes: 0/0

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

Twitter: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

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[www.toyotacapitalplaza.com](#)

Toyota Car

Summer Clearance on New and Used Toyota. Visit Springfield Showroom
[www.SpringfieldToyota.com](#)



is a Jerk

Recommend this on Google

Do you think [redacted] approval-seeking?

Agree Disagree



votes: 4/0

Jerk not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: 15

address: gay boulevard

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: Gay

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

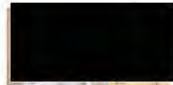
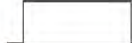
myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

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search



[redacted] Facebook

[redacted] all | Facebook

[redacted] Birth Records
[www.peoplesearchaffiliates.net/?url=ac&_act=birthRecords&location=...](#)

Music Artists - AOL Music
[music.aol.com/artist](#)
See what's new from your favorite bands and artists. Features new songs and videos, news and rumors, upcoming tour dates, biographies, pictures and much more.

sheet music - Sheet Music Plus
[www.sheetmusicplus.com/s?q=](#)
sheet music at Sheet Music Plus. ... E-Z Play Today #275 - Classical Hits (Bach, Beethoven & Brahms) (E-Z Play Today Volume 275).

0

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1) Type In Someone's Name 2) Get Obituary Now. Try Free!
Obituaries.Archives.com

Is He Lying To You?

1) Search His E-Mail Address 2) See Hidden Pics & Social Profiles Now!
Spokeo.com/Uncover-Liars

ITT Tech - Official Site

100 + Locations & Online Programs Official ITT Tech Site. Get Info!
www2.itt-tech.edu

Arrest Records: 2 Secrets

1) Enter Name and State. 2) Access Full Background Checks Instantly.
www.InstantCheckmate.com



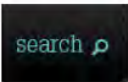
Recommend this on Google

Do you think [redacted] is versatile?

Agree Disagree



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Wikipedia, the free encyclopedia

[redacted] all outfielder in the Los Angeles Dodgers

[redacted] - BR Bullpen - Baseball-Reference.com - Major League ...

[redacted] one of the top hitters in

[redacted] site of ...

[redacted] networks, Inc. The most comprehensive

[redacted] os - Los Angeles ...

Player Bi [redacted] Coastal Carolina Official Athletic Site

www.gccus.com

[redacted] season as an assistant under head

votes: 0/0

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

Jerk :: [REDACTED] is not a jerk

http://www.jerk.com [REDACTED] PUBLIC [REDACTED].html

linked in: [buy](#) / [sell](#)

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[thredup.com](#)

80s Costumes - Cheap

Get Great Deals on 80s Costumes. Skirts, Leg Warmers and Much More!
[www.NextTag.com/80s-Costume](#)

Local Coupons

1 ridiculously huge coupon a day. Get 50-90% off your city's best!
[www.Groupon.com](#)

Ärzte fragen: Lymphknoten

8 Ärzte sind gerade online. Stellen Sie jetzt Ihre Frage!
[Arzt.JustAnswer.de](#)



Recommend this on Google

Do you thin [redacted] is independent?

Agree Disagree



votes: 2/1

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: 15

address: buy / sell

city: Trail [change]

zip code: buy / sell

country: Canada

mobile: buy / sell

msn: buy / sell

emails: [redacted] Add

occupa ion: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

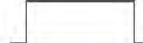
licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

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search



You have an error in your SQL syntax; check the manual that corresponds to your MySQL server version for the right syntax to use near 's_Kollektion_Black_Is_Back_2009_03-Q-Levi's-k.jpg' at line 1



or design firm committed to the design of buildings and spaces



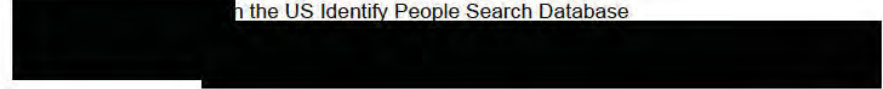
re I could reach the kitchen counter. My



n would be delighted if



You haven't heard of him? You will..."



h the US Identify People Search Database



Anonymous - 41 days ago Dispute 0

nd um... Someone put me on here for some reson. I think someone hates me?



Anonymous - 41 days ago Dispute 0

nd um... Someone put me on here for some reson. I think someone hates me?



Anonymous - 41 days ago Dispute 0

nd um... Someone put me on here for some reson. I think someone hates me?



Anonymous - 41 days ago Dispute 0

nd um... Someone put me on here for some reson. I think someone hates me?

Jerk :: [REDACTED] is a jerk

[http://www.jerk.com/\[REDACTED\].html](http://www.jerk.com/[REDACTED].html)

linked in: [buy](#) / [sell](#)

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is not a Jerk

Tweet



Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

Twitter: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

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Character

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+ post a report

votes: 0/0

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

Twitter: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

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Jerk

POST A JERK REMOVE SCHOOLS CITIES more sign in

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Online About Character

reports and stories

+ post a report

view more

votes: 1/0

Multimedia gallery
 Nominate this person for Jerk of the day
 Claim his profile

age: buy / sell
 address: buy / sell
 city: Choose
 zip code: buy / sell
 country:

mobile: buy / sell
 msn: buy / sell
 emails: Add

occupation: buy / sell
 universities: Add
 employer: buy / sell
 home phone: buy / sell
 work phone: buy / sell
 license plate: buy / sell

Twitter: buy / sell
 myspace: buy / sell
 ebay: buy / sell
 linked in: buy / sell

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Faux Palm Trees

Interior & Exterior Tropical Palms made to suit your Vision.
www.EarthFlora.com

Inventory Tracking System

Track your liquor the easy way. No expensive hardware required.
www.barkeepapp.com

Corporate Anti Spam

Comprehensive Anti Spam Solution. Try GFI MailEssentials™ 2012 Today
gfi.com/hosted-service-free-trial

[redacted]

[redacted] is not a Jerk

Recommend this on Google

Do you think [redacted] is defenseless?

Agree Disagree



votes: 4/5

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

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Facebook

Facebook gives people

[redacted] g.com
[redacted] g for men and women.

MugShot [redacted] Palm Harbor, FL - Busted! Mugshots - The ...

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Find Reviews ...

Mental Heal h Counseling, Addic ion Counseling.

Mental Health Counseling [redacted] Palm Beach Gardens ...

[redacted] counseling for individuals, couples, and teens in Palm Beach Gardens,

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[Online](#) [About](#) [Character](#)

Do you think [redacted] is rigid?

votes: 0/0

Multimedia gallery
 Nominate this person for Jerk of the day

age: 56
 address: [buy / sell](#)
 city: [Manasia \[change\]](#)
 zip code: [buy / sell](#)
 country: [Romania](#)

mobile: [buy / sell](#)
 msn: [buy / sell](#)
 emails:

accounts for: [buy / sell](#)
 universities: [Add](#)
 employer: [buy / sell](#)
 home phone: [buy / sell](#)
 work phone: [buy / sell](#)
 license plate: [buy / sell](#)

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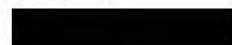
Search Certified Pre-Owned inventory. Find your Ford E-150.
ford.com/certified-used

Sell Your Gold

To the areas most trusted Buyer of gold and jewelry
pamilonia.com

Find Fords Near You

Ford Listings, Prices & Reviews. Shop with Confidence at Cars.com™!
Cars.com/Ford

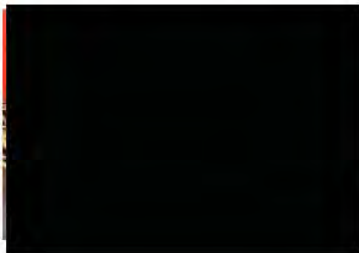


[redacted] is not a Jerk

Recommend this on Google

Do you think [redacted] angry?

Agree Disagree



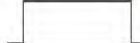
votes: 0/6

Jerk not a Jerk

- Multimedia gallery
- Nominate this person for Jerk of the day
- Claim his profile
- age: 12
- address: buy / sell
- city: Choose
- zip code: buy / sell
- country:
- mobile: buy / sell
- msn: buy / sell
- emails: [redacted] Add
- occupation: buy / sell
- universities: Add
- employer: buy / sell
- home phone: buy / sell
- work phone: buy / sell
- licence plate: buy / sell
- myspace: [redacted]
- ebay: buy / sell

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search



v9520 magic v44 ... (full screen)

Clips - Rapidshare Download Forum

forumwizard.net/clips

New posts: Hot thread with new posts: No new posts: Hot thread with no new posts: Thread is closed

Free Music Online - Internet Radio - Jango

www.jango.com

Free internet radio, just like Pandora only fewer ads and more variety. Listen to hundreds of genre stations or create your own with your favorite music.

Full Movies - Rapidshare Download Forum

forumwizard.net/full-movies

New posts: Hot thread with new posts: No new posts: Hot thread with no new posts: Thread is closed

Winamp Generated Playlist

echoal [redacted]



Jerk : [REDACTED] s not a jerk

http://www.jerk.com/[REDACTED].html

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0

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www.MidAtlanticFordDealers.com

Sell Your Vintage Jewelry

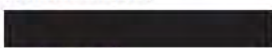
Highest possible price paid One item or entire estate
pampallonia.com

Photo Printers By Epson@

See Why Epson Is The Choice For Pro & Fine Art Photographers
www.Epson.com

2012 Ford F-150

Fuel-Efficient, Capable, Durable. Get Pricing on an F-150 at Ford.com
www.Ford.com/F150



[redacted] is not a Jerk

Recommend this on Google

Do you think [redacted] is protective?

Agree Disagree



votes: 1/3

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

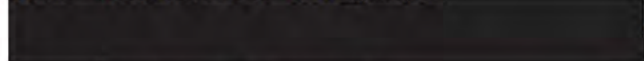
linked in: buy / sell

Find a Person, an University, or a City

search



Volaris - Westchester / LAX - Los Angeles, CA



AX ... Elite '12; 75 friends; 346

Wikipedia the free encyclopedia



eminine given

KOGT Radio 1600 AM - Orange, Texas

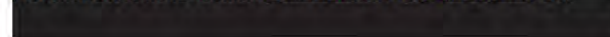
www.kogt.com

Guess Who Win

Issued by The Of



New Jersey Italian Restaurants | Italian Food in New Jersey



staurants in New Jersey

The Providence Journal | Rhode Island breaking news, sports ...

www.projo.com

Providencejournal.com, the official website for The Providence Journal newspaper: Your 24-hour source for breaking news, sports, business, politics, entertainment ...

Sell Your Estate Jewelry

To Washington's leading Estate and Antique buyer
pamollonia.com

Honda July 4 Sales Event

Enjoy 0.9% APR on 2012 Honda Accord for Well-Qualified Buyers till 7/9!
www.honda.com/ford_fusion

GUCCI@ Official Sale

Shop our Spring Summer Sale with Free Shipping & Free Returns.
www.Gucci.com

Ford Expedition Site

Get Specs, Price, Pics & Options. Research the Expedition @ Ford.com.
Ford.com/Expedition



[redacted] is not a Jerk

Recommend this on Google

Do you thin [redacted] s guarded?

Agree Disagree



votes: 0/3

Jerk not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim his profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country:

mobile: buy / sell

msn: buy / sell

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employer: buy / sell

home phone: buy / sell

work phone: buy / sell

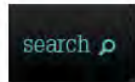
licence plate: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

Find a Person, an University, or a City



We Purchase Diamonds



Pampillon 202-363-6303



[redacted] Obituary by The ...

Engaged & Underage | Full Episodes, Photos, Episode Synopsis and ...
www.mtv.com/shows/engaged_and_underage/series.jhtml
Free full episode videos, photos, full episodes and recaps of Engaged & Underage on MTV.com.

Engaged And Underage — Blogs, Pictures, and more on WordPress

en.wordpress.com/tag/engaged-and-underage

Sex in the News: Married at Sixteen. Sweet Sixteen. Even hough it seems like a decade ago, I can remember mine fondly. To celebrate the big day, I took a weekend ...

Latest arrests from Slidell Police Department | NOI A.com

www.noia.com

[redacted] Facebook

[www.facebook.com/\[redacted\]](http://www.facebook.com/[redacted])

Facebook is a social u lity that connects people with friends and others who work, study and live around them. People use Facebook to keep up with friends, upload an ...

[redacted] Anonymous - 40 days ago Dispute 1 0

[redacted] is an amazing person and in no way a jerk shes sweet kind and funny and alwase cares bout people :)

0

Create a Social Network

Better Management and Moderation of Online Communities in Enterprises
Lithium.com/Community_Whitepaper

¿Busca Ramo De Flores?

#1 Mejores Ramo De Flores Tenemos Grandes Ofertas: Compra Ya!
Espanol.Housekool.com/Ofertas

Vestidos De Novia

Wedding Gowns Collection 2012 Stunning Wedding Dresses. Check now
www.mkarin.com

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Enviamos a Todo el País en el Día Gran Sur ido ¡Compra Hoy Mismo!
www.premiumflorist.com

[redacted]

is not a Jerk

Recommend this on Google

Do you think [redacted] s mean?

Agree

Disagree



votes: 3/4

Multimedia gallery

Nominate this person for Jerk of the day

age: [buy / sell](#)

address: [buy / sell](#)

city: [Choose](#)

zip code: [buy / sell](#)

country:

mobile: [buy / sell](#)

msn: [buy / sell](#)

email [redacted]

[Add](#)

occupa ion: [buy / sell](#)

universities: [Add](#)

employer: [buy / sell](#)

home phone: [buy / sell](#)

work phone: [buy / sell](#)

licence plate: [buy / sell](#)

myspace: [buy / sell](#)

ebay: [buy / sell](#)

linked in: [buy / sell](#)

Find a Person, an University, or a City

Ramos y Bouquets

Flores Artificiales Quince Años y Bodas
www.LACrafts.com

Guestbook - [redacted] Home Page

[redacted]

be helpful.. tromela ... of the art here in

Jerk

POST A JERK

REMOVE

more ▾

sign in

Get Our News, Everywhere!

TweeFollow @Jerk_com_news



Find a Person, an University, or a City

Online

About

Character

rep

+ post a report

is not a Jerk

Tweet



votes: 0/0

Jerk

not a Jerk

Multimedia gallery

Nominate this person for Jerk of the day

Claim this profile

age: buy / sell

address: buy / sell

city: Choose

zip code: buy / sell

country

mobile: buy / sell

msn: buy / sell

emails: Add

occupation: buy / sell

universities: Add

employer: buy / sell

home phone: buy / sell

work phone: buy / sell

licence plate: buy / sell

Twitter: buy / sell

myspace: buy / sell

ebay: buy / sell

linked in: buy / sell

CX0260
MARKED CONFIDENTIAL
VIDEO

REDACTED IN ITS ENTIRETY

(See CX0260 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0261
MARKED CONFIDENTIAL
VIDEO

REDACTED IN ITS ENTIRETY

(See CX0261 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0262
MARKED CONFIDENTIAL
VIDEO

REDACTED IN ITS ENTIRETY

(See CX0262 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0263
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VIDEO
REDACTED IN ITS ENTIRETY

(See CX0263 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0264

MARKED CONFIDENTIAL



Account Number XXXX-XXXX-XX	Payment Date 08/09/2012	New Balance \$0.00	Total Amount Due \$0.00	Enter Amount Paid
--------------------------------	----------------------------	-----------------------	----------------------------	-------------------



**N0001540

CITIBANK
P.O. BOX 183173
COLUMBUS, OH
43218-3173

For a credit balance refund, or a telephone or address change, please place an X in the parentheses () and make the desired changes on the reverse side. Thank you.

Payment coupon: Please tear along perforation and return this portion with your payment. Make check or money order payable in U.S. dollars on a U.S. bank to Citibank. Include account number on check or money order. No cash please. Do not staple or tape your check to this coupon.

CITIBANK CORPORATE CARD

Previous Balance	Payments and Credits	New Charges	New Balance	Credit Line
\$0.00	\$0.00	\$0.00	\$0.00	\$3,000

Statement Date
07/15/12

Payment Date
08/09/12

For customer service call or write 1-800-248-4553 P.O. Box 6125 Sioux Falls, SD 57117
Send payments to: Citibank P.O. Box 183173 Columbus, OH 43218-3173

Account Number XXXX-XXXX-XX	Cash Advance Limit* \$00	Available Credit Line \$3,000	Available Cash Line** \$00
--------------------------------	-----------------------------	----------------------------------	-------------------------------

Statement Date	Post Date	Reference Number	Type of Activity	Amount
----------------	-----------	------------------	------------------	--------

NOTICE MEMO ITEMS LISTED BELOW

07/03	07/04	24492152185537002484046	JERK LLC JERK.COM MA	25.00
TOTAL AMOUNT OF MEMO ITEM(S):				45.00

ACCOUNT SUMMARY		Previous Balance	Payments	Credits	Purchases and Advances	Interest Charges	New Balance
CURRENT PERIOD	Purchases	0.00					0.00
	Advances	0.00					0.00
	TOTALS	0.00					0.00

DAYS IN BILLING PERIOD: 30		<u>Purchases</u>	<u>Cash Advances</u>	Payment Due:	.00
Balance Subject To Interest Charges	>	.00	.00	Amount Over Credit Limit:	.00
Periodic Rate	>>	.0000%	.0000	Amount Past Due:	.00
ANNUAL PERCENTAGE RATE	>>>	.000%	.0000	MINIMUM AMOUNT DUE:	.00

*Cash Advance Limit is a portion of your Total Credit Line
** Available Cash Line is a portion of your Available Credit Line

CX0264-001

6/29/2012

http://citi.com/databases/nav/tim/control.htm

CX0265

**MARKED CONFIDENTIAL
VIDEO**

REDACTED IN ITS ENTIRETY

(See CX0265 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0266
MARKED CONFIDENTIAL
VIDEO

REDACTED IN ITS ENTIRETY

(See CX0266 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0267
MARKED CONFIDENTIAL
VIDEO

REDACTED IN ITS ENTIRETY

(See CX0267 on DVD attached to
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CX0268
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VIDEO
REDACTED IN ITS ENTIRETY

(See CX0268 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
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CX0269
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VIDEO
REDACTED IN ITS ENTIRETY

(See CX0269 on DVD attached to
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CX0270
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VIDEO

REDACTED IN ITS ENTIRETY

(See CX0270 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
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CX0271

MARKED CONFIDENTIAL

Jerk

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[CITIES](#)

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search

Results 1 - 20 of 79,952 results, page 1 of 3,998

<<Previous 1 2 3 4 5 6 7 8 9 10 Next>>

JERKS



Cindy
see profile

Jerk: 0/0

This one

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

Jerk: 0/0

This one

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

Jerk: 0/0

This one

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____



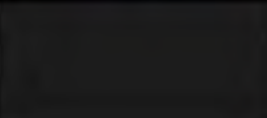
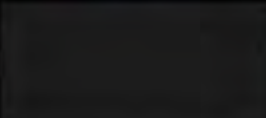
Cindy
see profile

Jerk: 0/0

This one

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

<p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>	<p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>
<p>City: _____</p> <p>Country: _____</p> <p>University: _____</p> <p>Cell Phone: _____</p> <p>Email(s): _____</p> <p>Occupation: _____</p> <p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>	 <p>City: _____</p> <p>Country: _____</p> <p>University: _____</p> <p>Cell Phone: _____</p> <p>Email(s): _____</p> <p>Occupation: _____</p> <p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>
<p>City: _____</p> <p>Country: _____</p> <p>University: _____</p> <p>Cell Phone: _____</p> <p>Email(s): _____</p> <p>Occupation: _____</p> <p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>	<p>City: _____</p> <p>Country: _____</p> <p>University: _____</p> <p>Cell Phone: _____</p> <p>Email(s): _____</p> <p>Occupation: _____</p> <p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>
 <p>City: _____</p> <p>Country: _____</p> <p>University: _____</p> <p>Cell Phone: _____</p> <p>Email(s): _____</p> <p>Occupation: _____</p> <p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>	<p>City: _____</p> <p>Country: _____</p> <p>University: _____</p> <p>Cell Phone: _____</p> <p>Email(s): _____</p> <p>Occupation: _____</p> <p>Cindy see profile</p> <p>Jerk: 0/0</p> <p>This one</p>
 <p>City: _____</p> <p>Country: _____</p>	 <p>City: _____</p> <p>Country: _____</p>

University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

Jerk: 0/0

This one

University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

Jerk: 0/0

This one



City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

Jerk: 0/0

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Occupation: _____

Cindy
see profile

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University: _____
Cell Phone: _____
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Cindy
see profile

Jerk: 0/0

This one

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Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

Jerk: 0/0

This one



City: _____
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University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

City: _____
Country: _____
University: _____
Cell Phone: _____
Email(s): _____
Occupation: _____

Cindy
see profile

CX0402

MARKED CONFIDENTIAL

EXHIBIT A

NEW ACCOUNT PROCEDURES
Dedicated Server

APPROVAL:

- Approved by Management *[Signature]*
- Approved by Accounting
- Verify Identity
- Government ID
- Credit Card

PAYMENT AND ACCOUNT SET-UP:

- Create Account
- Create Invoice
- Set Agent to Sales Rep or Partner
- Memorize Transaction for Next Billing
- Receive Payment
- Add Account to CRM
- Log Agent Commissions (if Applicable)

PROVISIONING

- Assign Datacenter *AVL*
- Order Hardware *500R*
- Assign Hardware (Mach Name) *AVL1020*
- Allocate Server IP Addresses
- Allocate Switch Port(s) *Su11-P3*
- Rack Location
- Test Hardware
- Monitoring
- Send Email/Welcome Kit

ACCOUNT FINALIZATION

- Send Thank You Letter
- Scan and File Paperwork

[Signature]
chang3m3

part 1/1

2006-11-01 09:14

>> 16172490143

P 1/6



SERVICE ORDER FORM

International Headquarters
1112 Boylston Street
Second Floor, PMB117
Boston, MA 02215

508/819.8801
817/249.0143 fax

Representative: Tony Costa

CUSTOMER INFORMATION

Company Name: Netcapital.com LLC

Phone: _____

FAX: _____

New Customer

Existing Customer

Order Date: 11/1/2006

Requested Install Date: 11/4/2008

Service Address: 100 Technology Drive

City: Asheville

State: NC Zip: 28803

Billing Address: 185 Nantasket Ave

City: Hull

State: MA Zip: 02045

Administrative Contact: John W Fanning

Phone: 781-925-1600

Email: john@netcapital.com

Technical Contact: John W Fanning

Phone: 781-925-1600

Email: _____

Billing Contact: John W Fanning

Phone: 781-925-1600

Email: john@netcapital.com

Emergency Contact: John W Fanning

Phone: 781-925-1600

Email: john@netcapital.com

Pager: 850-814-8800

User Name: _____

Password: _____

How many IP addresses are needed: _____

Domain Name: _____

SERVICES ORDERED

- | | |
|---|--|
| <input type="checkbox"/> Shared | <input type="checkbox"/> Custom Dedicated |
| <input type="checkbox"/> Virtual Ded. | <input type="checkbox"/> Application Hosting |
| <input checked="" type="checkbox"/> Dedicated | <input type="checkbox"/> Co-Location |
| <input type="checkbox"/> Other | |

Space:	NA
Monthly Service Fee:	\$ 99.00
One-time set-up Fee:	\$ 99.00
Total cost for first month:	\$ 198.00

Hardware Specifications / Service Inclusions

Promo Package, 2000GB/Month PE SC420, 2Gig SDRAM, P3.0, 100Mbps Burst, 3 IP, Support, 10GB Backup, 5 Tests

Length of Service Agreement: Month to Month

Federal Tax (ID# or Social Security) of responsible party:

Credit Card Info (Visa, Mastercard, American Express or Discover)

Card Number: [REDACTED]

Expiration: 1/07

Name On Card: John W Fanning

Billing Address: 185 Nantasket Ave Hull MA 02045
Call 277 Hingham MA 02043

Bill Credit Card each month: YES NO

Invoice Quarterly (in advance) YES NO

Invoice Annually (in advance) YES NO

(10% discount extended for annual pre-pay)

CLIENT APPROVAL

Printed Name: John W Fanning

Signature: [REDACTED]

Title/Position: Chairman

Date: 11/1/2006

NETRIPLEX APPROVAL

Printed Name: Jonathan Hoppe

Signature: [REDACTED]

Title/Position: CTO

Date: Oct Nov 1, 2006

Service Agreement

EBUSINESS HOSTING SOLUTIONS SERVICE SUBSCRIPTION AGREEMENT

1. HOSTING SERVICES. Host will provide connection to all organizations and individuals who agree to abide by Host's access terms, conditions, and fee schedules.

User is responsible for providing any equipment and/or software necessary to access Host's system and Internet facilities, unless otherwise provided for in this Agreement.

User is entitled to use any Internet services and time-share computer software provided by Host. User is responsible for any licensing fees for any "shareware" products provided by Host to User.

Host will provide the Hosting services provided in the service package chosen by User, and set forth on page one of the Service Order Form, including a server or space on a shared server, connection of the server to Host's high-speed Internet connection, backup of the server's hard disk and other maintenance on the server, domain name, e-mail, and file transfer services as provided in the chosen service package, automated server monitoring and limited log file generation and access. All equipment provided by Host shall remain Host's property.

The services and software offered are subject to change and limitation at Host's discretion, as in any pricing schedule. Host will notify User of any changes by electronic or postal mail to the agent named in this Agreement or other User officer a minimum of 14 days in advance, unless the change is judged by Host to be necessary to preserve proper security or functioning of Host's system. If User objects to any change in service, unless the change is one Host has determined is necessary for security purposes or to maintain proper operation of Host's system, User will be entitled to cancel its account.

User's continued use of the Hosting services after the effective date of such modified general terms and conditions, policies, or changes in services or software will constitute User's acceptance of such modified terms.

This Agreement covers only Internet services and any time-share software related to the provision of Internet services, Dedicated Hosting services, and any ancillary services such as domain name service and electronic mail.

2. FEES. User will pay (a) subscription fees in advance, (b) fees for other goods or services as invoiced, and (c) any security deposit, in each case per the applicable price schedule set forth on page one of the Service Order Form.

3. TERMINATION AND REINSTATEMENT. This Agreement may be terminated by either party on not less than 30-days prior written notice.

If User (a) becomes bankrupt or otherwise insolvent or (b) fails to pay for services rendered in accordance with the terms hereof or (c) commits any other breach of this Agreement, Host may, at its sole discretion and without notice or judicial intervention, discontinue performance and terminate this Agreement for default and pursue any other remedies available at law or in equity.

If User's account is suspended due to lack of payment, User will pay the then current reinstatement fee, in addition to all other charges then due and payable, prior to restoration of service.

4. CUSTOMER SUPPORT. Host will provide to User reasonable amounts of consultation via telephone and/or electronic mail in the use of the system, but cannot promise to assist with any services that are not maintained or controlled by Host.

5. DISCLAIMER AND LIMITATION OF LIABILITY. With the exception of any express warranty herein, neither Host, nor its affiliates (hereinafter "Host"), nor its suppliers make any warranty, and each of them disclaims any liability, with respect to:

(a) the accuracy, completeness, currentness, error-free nature, or fitness for any particular purpose of any data or services accessed on or through the Host system, or

(b) system performance levels, including but not limited to resource utilization, response time or overhead, unless such a performance guarantee is part of the chosen Hosting services package represented by a SLA, or

(c) any loss or inconvenience associated with Host's suspension, termination, or deletion of User's account, or

Client Initials:



2006-11-01 09:15

>> 16172490143

23/8

(d) ANY OTHER WARRANTY, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

NO ORAL ADVICE OR WRITTEN ADVICE GIVEN BY HOST OR ITS STAFF OR AGENTS SHALL CREATE A WARRANTY.

Host will not be liable for delay in delivery or performance of hosting or design services, and is excused from any failure to deliver or perform, due to causes beyond its reasonable control unless a specific level of service is guaranteed via a SLA.

Host will not be liable for any damage or inconvenience caused by any necessary or scheduled maintenance to Host's system, or for any service issues or loss of customer data caused by forces beyond Host's reasonable control. Host recommends that User make archival copies or otherwise download any important information stored on Host's system, in addition to any backups Host may perform.

THE SOLE AND ENTIRE MAXIMUM LIABILITY OF HOST TO ANY USER FOR ANY AND ALL PROVEN LOSS, CLAIM, DAMAGE OR LIABILITY OF ANY KIND (INCLUDING BUT NOT LIMITED TO CONTRACT OR TORT) WITH RESPECT TO ALL SERVICES PROVIDED BY HOST AND ANY ACT OR OMISSION OF HOST WILL CONSIST OF A DUTY TO REFUND NOT MORE THAN THE AMOUNTS PAID BY THE USER TO HOST DURING THE YEAR PRECEDING SUCH LOSS, CLAIM, DAMAGE OR LIABILITY. IN NO EVENT WILL HOST BE LIABLE FOR ANY INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES, EVEN IF HOST HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

User, by signing this Agreement or connecting to the Host system, (a) accepts the use of the system/interconnection (including any programs, data, or services) "AS IS"; and (b) waives any and all claims relating thereto, whether such claims are against Host or any of its suppliers or affiliates.

Should any legal action or threat of legal action result as a result of User's use, or of any of Host's system, interconnection facilities, or services, User agrees to indemnify Host, its staff, or Host's other Users, for any costs incurred in defending against any such threat or action, including reasonable attorneys' fees and any equipment replacement costs, even if User is no longer a customer of Host when such expenses arise. This clause also applies to third party claims as well as any legal action taken by Host against User for breach of this Agreement, damage caused by User to Host's system, or for failure to pay expenses User is obligated to pay Host.

5. USE RESTRICTIONS AND INDEMNIFICATION. User agrees to adhere to Host's "Acceptable Use Policy", a copy of which is attached to this Agreement, and which policy may be changed from time to time - User agrees to adhere to all such changes if has notice of.

User will indemnify and hold Host harmless from any costs, expenses (including reasonable attorneys fees) or liability resulting from any claim based on User's use of the system. Such indemnification will not be applicable with respect to claims of gross negligence, willful misconduct or stringement by Host. Such indemnity will survive the termination or expiration of this Agreement.

7. GENERAL. No waiver of any breach of any provision of this Agreement will constitute a waiver of any prior, concurrent or subsequent breach of this Agreement or any provision thereof. If any provision of the Agreement is or becomes illegal or otherwise unenforceable, such provision will not invalidate the other provisions hereof; provided if Host determines that any such unenforceable provision is essential, it may terminate this Agreement upon notice.

User grants any permissions or licenses (including but not limited to copyright licenses), as may be required, and within User's power to grant, to Host in order to provide Internet and related services to User, or as may be required for Host to operate for User's benefit.

This Agreement is governed by the laws of the State of New Hampshire. The parties agree that the courts (state and federal) located in New Hampshire, will have non-exclusive jurisdiction to determine the validity, construction and performance of this Agreement and the legal relations between the parties.

This Agreement constitutes the entire Agreement between Host and User, and supercedes all prior agreements, proposals, representations, or other communications, relative to the subject matter hereof. Paragraph headings are included for convenience and are not to be used to interpret this Agreement.

Client Initials:



2006-11-01 09:15

-- 16172490143

P.1/6

This Agreement may not be assigned by User with the written consent of Host.

8. CHANGES IN LEGISLATION: Should any changes in legislation require any changes to this Agreement or any services provided by Host, Host reserves the right to make any such changes, as are determined necessary or prudent, at Host's sole discretion, without giving User advanced notice. If such changes are made, Host promises to send by electronic or postal mail notice of any changes in a reasonable time period. In event of such changes, User may terminate service without the required 30 day notice, but is not entitled to a refund of any payments already made for services.

Client Initials:

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, written over a horizontal line.

Form Rev. 03.10.g

CX0402-006

Service Level Agreement (SLA)

30 Day Satisfaction Guarantee: Netriplex guarantees all services and rented hardware with a 30 day satisfaction guarantee. If you are not completely satisfied with the level of service or rented hardware within the first 30 days from contract execution, you may cancel the remainder of the contract without any further recourse or amounts due. To satisfy the 30 day satisfaction guarantee, you must present a written statement of dissatisfaction to our accounting department prior to the expiration of 30 days from the date of contract execution. Setup fees and first month recurring fees are non-refundable.

Service Credits: service credits are available for services contracted for, but not delivered according to the service level agreement. Service credits are not available to customers more than 30 days in arrears on their billing cycle. Valid approved service credits will appear as a credit for services on the next billable invoice. Service credits shall not result in monies paid by Netriplex directly to the customer. All service credit requests must be in writing and emailed directly to billing@netriplex.com within 10 days from the date of the service level failure. Failure to request a service credit within 10 days of the service failure will result in an automatic waiver of any rights under the Master Service Level Agreement. Normal scheduled maintenance and upgrades are not covered in the uptime guarantee.

100% Network Guarantee: Netriplex offers a 100% uptime guarantee on all network related services (i.e. bandwidth, routers, switches, servers and cabling,). The 100% uptime guarantee is applicable to all network services delivered to customer. Customer generated outages created by failed equipment (if collocated), exploited/hacked servers, misconfigurations or traffic in excess of the maximum allowed by contract are not subject to the SLA. Service credits are based directly on all equipment and/or services affected by a network outage. Services or hardware not related to the network outage will not qualify for a service credit.

Performance: Netriplex guarantees a maximum average 40ms (milliseconds) network route from the input connection to the customer equipment through the internal network and out to the first BGP peer calculated over a 24 hour period.

Availability: Netriplex guarantees 100% uptime on all redundant internet connectivity. Connectivity is measured as traffic routing into and out of rented customer equipment through the internal network out to internet carriers. Netriplex does not guarantee third party carrier latency or peering problems not utilized by Netriplex.

Power Guarantee: Netriplex guarantees a 100% uptime on all power located in the datacenter area for customer use. Power is defined as TXU supplied power and alternate power via UPS battery backup power and generator supplied power.

Hardware Guarantee: Netriplex guarantees all rented hardware components and will replace any failed component at no cost to the customer. Hardware replacement will begin immediately upon identification of the hardware failure and is guaranteed to be complete within 2 hours of problem identification. Hardware is defined as the routers, switches, disk arrays, tape backup systems, processors, RAM, hard disks, motherboards, NIC cards, power supplies, raid controllers, and any other hardware rented through Netriplex.

Scheduled Maintenance: The scheduled maintenance and upgrade window for all customers are limited to Sunday(s) only and will be performed from 2:00am to 4:00am eastern standard time. Notification from Netriplex administrative staff will occur at least 3 days prior to work performed. Notification failure of normal (non-emergency) maintenance by Netriplex staff will result in application of the uptime guarantee.

Netriplex shall not be liable for failure or delay in performing its obligations hereunder if such failure or delay is due to external circumstances beyond its reasonable control, including, without limitation, acts of any governmental body, war, insurrection, sabotage, embargo, fire, flood, strike or other labor disturbance, interruption of or delay in transportation, unavailability of interruption or delay in telecommunications, failure of third party software or inability to obtain raw materials, supplies, or power used in or equipment needed for provision of the Services. Netriplex agrees to exercise reasonable care to prevent such occurrences; however, under no circumstances will Netriplex be held liable for any financial or other damages due to such interruptions. In no event shall Netriplex be liable to Customer or any other person for any special, incidental, consequential or punitive damages of any kind, including, without limitation, refunds of fees, loss of profits, cost of cover, loss of income or cost of replacement services.

Acceptable Use Policy

1. **LEGAL USES.** Host's system and services may not be used in any way which violates Federal, State, Local, or International law. This prohibits, but is not limited to, any actions which are threatening, obscene, defamatory, or which violate trade secret, copyright or patent protection, or rights of privacy or publicity, or which result in the spread of computer viruses or other damaging programs or data files, or which violate any export restrictions (including making non-exportable information or software available to foreign nationals as may be prohibited by law). In the event User is suspected of any such violation, Host reserves the right to immediately suspend or terminate User's account.

2. **NETWORK TRANSMISSIONS.** User is responsible for any materials passed via Host's system to other networks, and agrees to comply with any restrictions posed by the other network's terms of service or acceptable use policies.

3. **PROHIBITED MATERIALS.** User is strictly forbidden from hosting websites that contain pornographic materials or that send Unsolicited Commercial Email (UCE) otherwise known as SPAM.

4. **CONFIDENTIALITY.** Host will protect to the best of its ability the confidentiality of any files and electronic mail stored on or exchanged over the system, except as may be necessary to provide the requested Internet services, or as may be necessary to preserve the security and proper operation of Host's system, or to protect Host's rights or property.

Host, except as otherwise provided for in this Agreement or as required by law, will use its best efforts to avoid disclosing the contents of private electronic mail to anyone other than addressees, authorized recipients, or those to whom such disclosure is necessary to assure forwarding or delivery.

User acknowledges that no system on the Internet can be guaranteed safe from unauthorized intrusion, and therefore any confidential information stored on or transmitted through Host's system is stored or transmitted at User's own risk.

5. **SECURITY CONCERNS.** User is responsible for choosing a secure password and for keeping it secret.

User may not attempt to bypass any security mechanisms in place on Host's system, or use any of Host's systems or services to attempt to bypass any security mechanisms in place on any remote system. This includes, but is not limited to, port scanning, running any password cracking software, or attempting to access a system which any user knows or reasonably should know he or she is not authorized to access in the manner or to the extent attempted.

6. **COPYRIGHT ISSUES.** User agrees not to upload to, download from, make available for public access on, or transmit through Host's system any copyrighted material in violation of the copyright owner's rights in that material. By uploading, downloading, making available for public access, or transmitting any copyright-protected material, User warrants that User has the proper authorization to make or authorize the making of any copies involved with such uploading, downloading, making available for public access, or transmission. Unauthorized copying, or authorizing the copying of protected works in excess of any legal right through Host's system is a violation of federal law and international treaties, and may result in not only termination of User's account, but also may result in civil and/or criminal fines and prison sentences.

User agrees not to remove any copyright ownership information, or falsify such information, on any files uploaded, downloaded, made publicly available through, or transmitted via Host's system.

User explicitly licenses Host to make any copies of copyright protected materials necessary to provide Internet and related services to User, as well as make any necessary copies necessary to preserve and maintain Host's system and User's files and electronic mail.

User explicitly licenses Host to make any copies, without limitation, of any copyrighted materials submitted to a public forum maintained on Host's system, or submitted to any forum to which Host provides access. This clause cannot be modified by either party unless any modification is in writing and signed by both parties.



NEW ACCOUNT PROCEDURES
Dedicated Server

APPROVAL:

- Approved by Management fr
- Approved by Accounting _____
- Verify Identity _____
- Government ID _____
- Credit Card _____

PAYMENT AND ACCOUNT SET-UP:

- Create Account _____
- Create Invoice _____
- Set Agent to Sales Rep or Partner _____
- Memorize Transaction for Next Billing _____
- Receive Payment _____
- Add Account to CRM _____
- Log Agent Commissions (if Applicable) _____

PROVISIONING

- Assign Datacenter AVL
- Order Hardware _____
- Assign Hardware (Mach Name) AVL 6021, AVL1022
- Allocate Server IP Addresses _____
- Allocate Switch Port(s) 5,6
- Rack Location RACK 1
- Test Hardware _____
- Monitoring _____
- Send Email/Welcome Kit _____

ACCOUNT FINALIZATION

- Send Thank You Letter _____
- Scan and File Paperwork _____

partal

netriplex

International Headquarters
 1112 Boylston Street
 Second Floor, PMB17
 Boston, MA 02216
 800/819.8801
 617/249.0143 fax

Representative: Tony Costa

CUSTOMER INFORMATION

Company Name: Netwire Inc.
 Phone: (781) 925-1700
 FAX: (781) 925-6545
 New Customer
 Existing Customer
 Order Date: 11/9/2008
 Requested Install Date: 11/11/2008

Service Address: 100 Technology Drive
 City: Asheville
 State: NC Zip: 28803

Billing Address: Box 277
 City: Hingham
 State: MA Zip: 02043

Administrative Contact: John W Fanning
 Phone: 781-925-1800
 Email: john@netwire.com

Technical Contact: Peter Schmidt
 Phone: _____
 Email: peter@netwire.com

Billing Contact: John W Fanning
 Phone: 781-925-1800
 Email: john@netwire.com

Emergency Contact: John W Fanning
 Phone: 781-925-1800
 Email: john@netwire.com
 Pager: 650-814-8800

User Name: _____
 Password: _____
 How many IP addresses are needed: _____
 Domain Name: _____

SERVICES ORDERED

<input type="checkbox"/> Shared	<input type="checkbox"/> Custom Dedicated
<input type="checkbox"/> Virtual Ded.	<input type="checkbox"/> Application Hosting
<input checked="" type="checkbox"/> Dedicated	<input type="checkbox"/> Co-Location
<input type="checkbox"/> Other	

Space: NA
 Monthly Service Fee: \$ 198.00
 One-time set-up Fee: \$ -
 Total cost for first month: \$ 198.00

Hardware Specifications / Service Inclusions

Two servers under Promo Package, 300GB/Month PE SC420, 2Gig SDRAM, P3.0, 250 GB SATA HDD 100Mbps Burst, 3 IP, Support, 10GB Backup, 5 Tests.

Length of Service Agreement: Month to Month

Federal Tax ID# or Social Security# of responsible party: _____

Credit Card into (Visa, Mastercard, American Express or Discover)

Card Number: _____
 Expiration: 11/09
 Name On Card: John Fanning
 Billing Address: Box 277
Hingham, MA 02043

Bill Credit Card each month: YES NO

Invoice Quarterly (in advance) YES NO

Invoice Annually (in advance) YES NO

(10% discount extended for annual pre-pay)

CLIENT APPROVAL

John W Fanning
 Signature: _____
 Title/Position: _____
 Date: 10/14/2008

NETRIPLEX APPROVAL

Jonathan Hoppe
 Signature: _____
 Title/Position: CTO
 Date: Nov 15, 2008

EBUSINESS HOSTING SOLUTIONS SERVICE SUBSCRIPTION AGREEMENT

1. HOSTING SERVICES. Host will provide connection to all organizations and individuals who agree to abide by Host's access terms, conditions, and fee schedules.

User is responsible for providing any equipment and/or software necessary to access Host's system and Internet facilities, unless otherwise provided for in this Agreement.

User is entitled to use any Internet services and time-share computer software provided by Host. User is responsible for any licensing fees for any "shareware" products provided by Host to User.

Host will provide the Hosting services provided in the service package chosen by User, and set forth on page one of the Service Order Form, including a server or space on a shared server, connection of the server to Host's high-speed Internet connection, backup of the server's hard disk and other maintenance on the server, domain name, e-mail, and file transfer services as provided in the chosen service package, automated server monitoring and limited log file generation and access. All equipment provided by Host shall remain Host's property.

The services and software offered are subject to change and limitation at Host's discretion, as is any pricing schedule. Host will notify User of any changes by electronic or postal mail to the agent named in this Agreement or other User officer a minimum of 14 days in advance, unless the change is judged by Host to be necessary to preserve proper security or functioning of Host's system. If User objects to any change in service, unless the change is one Host has determined is necessary for security purposes or to maintain proper operation of Host's system, User will be entitled to cancel its account.

User's continued use of the Hosting services after the effective date of such modified general terms and conditions, policies, or changes in services or software will constitute User's acceptance of such modified terms.

This Agreement covers only Internet services and any time-share software related to the provision of Internet services, Dedicated Hosting services, and any ancillary services such as domain name service and electronic mail.

2. FEES. User will pay (a) subscription fees in advance, (b) fees for other goods or services as invoiced, and (c) any security deposit, in each case per the applicable price schedule set forth on page one of the Service Order Form.

3. TERMINATION AND REINSTATEMENT. This Agreement may be terminated by either party on not less than 30-days prior written notice.

If User (a) becomes bankrupt or otherwise insolvent or (b) fails to pay for services rendered in accordance with the terms hereof or (c) commits any other breach of this Agreement, Host may, at its sole discretion and without notice or judicial intervention, discontinue performance and terminate this Agreement for default and pursue any other remedies available at law or in equity.

If User's account is suspended due to lack of payment, User will pay the then current reinstatement fee, in addition to all other charges then due and payable, prior to restoration of service.

4. CUSTOMER SUPPORT. Host will provide to User reasonable amounts of consultation via telephone and/or electronic mail in the use of the system, but cannot promise to assist with any services that are not maintained or controlled by Host.

5. DISCLAIMER AND LIMITATION OF LIABILITY. With the exception of any express warranty herein, neither Host, nor its affiliates (hereinafter "Host"), nor its suppliers make any warranty, and each of them disclaims any liability, with respect to:

- (a) the accuracy, completeness, currentness, error-free nature, or fitness for any particular purpose of any data or services accessed on or through the Host system, or
- (b) system performance levels, including but not limited to resource utilization, response time or overhead, unless such a performance guarantee is part of the chosen Hosting services package represented by a SLA, or
- (c) any loss or inconvenience associated with Host's suspension, termination, or deletion of User's account, or

Client Initials: 

IRRESCINDIBLE CONTRACT UNDER MASSACHUSETTS LAW.

NO ORAL ADVICE OR WRITTEN ADVICE GIVEN BY HOST OR ITS STAFF OR AGENTS SHALL CREATE A WARRANTY.

Host will not be liable for delay in delivery or performance of hosting or design services, and is excused from any failure to deliver or perform, due to causes beyond its reasonable control unless a specific level of service is guaranteed via a SLA.

Host will not be liable for any damage or inconvenience caused by any necessary or scheduled maintenance to Host's system, or for any service lapses or loss of customer data caused by forces beyond Host's reasonable control. Host recommends that User make archival copies or otherwise download any important information stored on Host's system, in addition to any backups Host may perform.

THE SOLE AND ENTIRE MAXIMUM LIABILITY OF HOST TO ANY USER FOR ANY AND ALL PROVEN LOSS, CLAIM, DAMAGE OR LIABILITY OF ANY KIND (INCLUDING BUT NOT LIMITED TO CONTRACT OR TORT) WITH RESPECT TO ALL SERVICES PROVIDED BY HOST AND ANY ACT OR OMISSION OF HOST WILL CONSIST OF A DUTY TO REFUND NOT MORE THAN THE AMOUNTS PAID BY THE USER TO HOST DURING THE YEAR PRECEDING SUCH LOSS, CLAIM, DAMAGE OR LIABILITY. IN NO EVENT WILL HOST BE LIABLE FOR ANY INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES, EVEN IF HOST HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

User, by signing this Agreement or connecting to the Host system, (a) accepts the use of the system/interconnection (including any programs, data, or services) "AS IS"; and (b) waives any and all claims relating thereto, whether such claims are against Host or any of its suppliers or affiliates.

Should any legal action or threat of legal action result as a result of User's use, or of any of Host's system, interconnection facilities, or services, User agrees to indemnify Host, its staff, or Host's other Users, for any costs incurred in defending against any such threat or action, including reasonable attorneys' fees and any equipment replacement costs, even if User is no longer a customer of Host when such expenses arise. This clause also applies to third party claims as well as any legal action taken by Host against User for breach of this Agreement, damage caused by User to Host's system, or for failure to pay expenses User is obligated to pay Host.

6. USE RESTRICTIONS AND INDEMNIFICATION. User agrees to adhere to Host's "Acceptable Use Policy", a copy of which is attached to this Agreement, and which policy may be changed from time to time - User agrees to adhere to all such changes it has notice of.

User will indemnify and hold Host harmless from any costs, expenses (including reasonable attorneys fees) or liability resulting from any claim based on User's use of the system. Such indemnification will not be applicable with respect to claims of gross negligence, willful misconduct or infringement by Host. Such indemnity will survive the termination or expiration of this Agreement.

7. GENERAL. No waiver of any breach of any provision of this Agreement will constitute a waiver of any prior, concurrent or subsequent breach of this Agreement or any provision thereof. If any provision of the Agreement is or becomes illegal or otherwise unenforceable, such provision will not invalidate the other provisions hereof, provided if Host determines that any such unenforceable provision is essential, it may terminate this Agreement upon notice.

User grants any permissions or licenses (including but not limited to copyright licenses), as may be required, and within User's power to grant, to Host in order to provide Internet and related services to User, or as may be required for Host to operate for User's benefit.

This Agreement is governed by the laws of the State of New Hampshire. The parties agree that the courts (state and federal) located in New Hampshire, will have non-exclusive jurisdiction to determine the validity, construction and performance of this Agreement and the legal relations between the parties.

This Agreement constitutes the entire Agreement between Host and User, and supersedes all prior agreements, proposals, representations, or other communications, relative to the subject matter hereof. Paragraph headings are included for convenience and are not to be used to interpret this Agreement.

Client Initials:



5. CHANGES IN LEGISLATION. Should any changes in legislation require any changes to this Agreement or any services provided by Host, Host reserves the right to make any such changes, as are determined necessary or prudent, at Host's sole discretion, without giving User advanced notice. If such changes are made, Host promises to send by electronic or postal mail notice of any changes in a reasonable time period. In event of such changes, User may terminate service without the required 30 day notice, but is not entitled to a refund of any payments already made for services.

Client initials:



NetCapital Hosting_C2006_Form 111500

Form Rev. 03.10.0

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Service Level Agreements (SLA)

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Netriplex shall not be liable for failure or delay in performing its obligations hereunder if such failure or delay is due to external circumstances beyond its reasonable control, including, without limitation, acts of any governmental body, war, insurrection, sabotage, embargo, fire, flood, strike or other labor disturbances, interruption of or delay in transportation, unavailability of interruption or delay in telecommunications, failure of third party software or inability to obtain raw materials, supplies, or power used in or equipment needed for provision of the Services. Netriplex agrees to exercise reasonable care to prevent such occurrences; however, under no circumstances will Netriplex be held liable for any financial or other damages due to such interruptions. In no event shall Netriplex be liable to Customer or any other person for any special, incidental, consequential or punitive damages of any kind, including, without limitation, refunds of lease, loss of profits, cost of cover, loss of income or cost of replacement services.

ACCEPTABLE USE POLICY

1. **LEGAL USES.** Host's system and services may not be used in any way which violates Federal, State, Local, or International law. This prohibits, but is not limited to, any actions which are threatening, obscene, defamatory, or which violate trade secret, copyright or patent protection, or rights of privacy or publicity, or which result in the spread of computer viruses or other damaging programs or data files, or which violate any export restrictions (including making non-exportable information or software available to foreign nationals as may be prohibited by law). In the event User is suspected of any such violation, Host reserves the right to immediately suspend or terminate User's account.

2. **NETWORK TRANSMISSIONS.** User is responsible for any materials passed via Host's system to other networks, and agrees to comply with any restrictions posed by the other network's terms of service or acceptable use policies.

3. **PROHIBITED MATERIALS.** User is strictly forbidden from hosting websites that contain pornographic materials or that send Unsolicited Commercial Email (UCE) otherwise known as SPAM.

4. **CONFIDENTIALITY.** Host will protect to the best of its ability the confidentiality of any files and electronic mail stored on or exchanged over the system, except as may be necessary to provide the requested internet services, or as may be necessary to preserve the security and proper operation of Host's system, or to protect Host's rights or property.

Host, except as otherwise provided for in this Agreement or as required by law, will use its best efforts to avoid disclosing the contents of private electronic mail to anyone other than addressees, authorized recipients, or those to whom such disclosure is necessary to assure forwarding or delivery.

User acknowledges that no system on the Internet can be guaranteed safe from unauthorized intrusion, and therefore any confidential information stored on or transmitted through Host's system is stored or transmitted at User's own risk.

5. **SECURITY CONCERNS.** User is responsible for choosing a secure password and for keeping it secret.

User may not attempt to bypass any security mechanisms in place on Host's system, or use any of Host's systems or services to attempt to bypass any security mechanisms in place on any remote system. This includes, but is not limited to, port scanning, running any password cracking software, or attempting to access a system which any user knows or reasonably should know he or she is not authorized to access in the manner or to the extent attempted.

6. **COPYRIGHT ISSUES.** User agrees not to upload to, download from, make available for public access on, or transmit through Host's system any copyrighted material in violation of the copyright owner's rights in that material. By uploading, downloading, making available for public access, or transmitting any copyright-protected material, User warrants that User has the proper authorization to make or authorize the making of any copies involved with such uploading, downloading, making available for public access, or transmission. Unauthorized copying, or authorizing the copying of protected works in excess of any legal right through Host's system is a violation of federal law and international treaties, and may result in not only termination of User's account, but also may result in civil and/or criminal fines and prison sentences.

User agrees not to remove any copyright ownership information, or falsify such information, on any files uploaded, downloaded, made publicly available through, or transmitted via Host's system.

User explicitly licenses Host to make any copies of copyright protected materials necessary to provide Internet and related services to User, as well as make any necessary copies necessary to preserve and maintain Host's system and User's files and electronic mail.

User explicitly licenses Host to make any copies, without limitation, of any copyrighted materials submitted to a public forum maintained on Host's system, or submitted to any forum to which Host provides access. This clause cannot be modified by either party unless any modification is in writing and signed by both parties.

SERVER PROVISIONING WORKSHEET

COMPANY: Netwire Inc.

Machine(s) to configure:

Name: AVL1028
Purpose: Database Server
Components: Intel Dual Processor Board
 Dual 2.8GHz XEON processor
 4 GB RAM
 SCSI RAID card
 3 x 73GB Drives, RAID 5
 Unbreakable Oracle (Linux) or Centos
 Partitions: root 30GB; /u01 100GB; /tmp 10GB

IP Address(es): [Redacted] - useable IP range .34
 [Redacted] - gateway
 [Redacted] - subnet
 [Redacted] - broadcast

Tech notes:

hrs 3004
EBERS

Technician name: _____
 Completed date: _____
 Completed time: _____
 Rack Location: Row 3 Rack 8
 Power Bar & Port(s): _____
 Switch Port(s): _____

portal

netriplex

NETRIPLEX ORDER FORM

International Headquarters
1112 Boylston Street
Second Floor, PMB17
Boston, MA 02215

800/819.8801
617/249.0143 fax

Representative: Tony Costa

CUSTOMER INFORMATION

Company Name: Netwire Inc.
Phone: (781) 925-1700
FAX: (781) 925-6545

New Customer
Existing Customer

Order Date: 11/27/2006

Requested Install Date: 11/28/2006

Service Address: 100 Technology Drive
City: Asheville
State: NC Zip: 28603

Billing Address: Box 277
City: Hingham
State: MA Zip: 02043

Administrative Contact: John W Fanning
Phone: 781-925-1600
Email: john.fanning@netwire.com

Technical Contact: Peter Schmidt
Phone: _____
Email: peter@netwire.com

Billing Contact: John W Fanning
Phone: 781-925-1600
Email: john.fanning@netwire.com

Emergency Contact: John W Fanning
Phone: 781-925-1600
Email: john.fanning@netwire.com
Pager: 550-814-8800

User Name: _____
Password: _____

How many IP addresses are needed: _____
Domain Name: _____

SERVICES ORDERED

Shared Custom Dedicated
 Virtual Ded. Application Hosting
 Dedicated Co-Location
 Other _____

Space: NA
Monthly Service Fee: \$ 195.00
One-time set-up Fee: \$ _____
Total cost for first month: \$ 195.00

Hardware Specifications / Service Inclusions

PE 2550 Dual 1.4GHz CPU, 2 GIGORAM, 2x735CS1 Raid1
100Mbps port, 336 monthly transfer, the other has dual 1.1GHz
processors, 3 IP, Support, 10GB Backup, 5 Tests.

Length of Service Agreement: Month to Month

Federal Tax ID# or Social Security# of responsible party:
[REDACTED]

Credit Card Info (Visa, Mastercard, American Express or Discover)

Card Number: _____
Expiration: _____
Name On Card: _____
Billing Address: _____

Bill Credit Card each month: YES NO

Invoice Quarterly (in advance) YES NO

Invoice Annually (in advance) YES NO
(10% discount extended for annual pre-pay)

CLIENT APPROVAL

John W Fanning
Printed Name: _____
Signature: [Signature]
Title/Position: Chairman
Date: Nov 27 06

NETRIPLEX APPROVAL

[Signature]
Printed Name: _____
Signature: [Signature]
Title/Position: _____
Date: NOV 27 2006

EBUSINESS HOSTING SOLUTIONS SERVICE SUBSCRIPTION AGREEMENT

1. **HOSTING SERVICES.** Host will provide connection to all organizations and individuals who agree to abide by Host's access terms, conditions, and fee schedules.

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2. **FEES.** User will pay (a) subscription fees in advance, (b) fees for other goods or services as invoiced, and (c) any security deposit, in each case per the applicable price schedule set forth on page one of the Service Order Form.

3. **TERMINATION AND REINSTATEMENT.** This Agreement may be terminated by either party on not less than 30-days prior written notice.

If User (a) becomes bankrupt or otherwise insolvent or (b) fails to pay for services rendered in accordance with the terms hereof or (c) commits any other breach of this Agreement, Host may, at its sole discretion and without notice or judicial intervention, discontinue performance and terminate this Agreement for default and pursue any other remedies available at law or in equity.

If User's account is suspended due to lack of payment, User will pay the then current reinstatement fee, in addition to all other charges then due and payable, prior to restoration of service.

4. **CUSTOMER SUPPORT.** Host will provide to User reasonable amounts of consultation via telephone and/or electronic mail in the use of the system, but cannot promise to assist with any services that are not maintained or controlled by Host.

5. **DISCLAIMER AND LIMITATION OF LIABILITY.** With the exception of any express warranty herein, neither Host, nor its affiliates (hereinafter "Host"), nor its suppliers make any warranty, and each of them disclaims any liability, with respect to:

- (a) the accuracy, completeness, currentness, error-free nature, or fitness for any particular purpose of any data or services accessed on or through the Host system, or
- (b) system performance levels, including but not limited to resource utilization, response time or overhead, unless such a performance guarantee is part of the chosen Hosting services package represented by a SLA, or
- (c) any loss or inconvenience associated with Host's suspension, termination, or deletion of User's account, or

Client Initials:



NetCapital Hosting_Order_Form 112705

Form Rev. 03.10.11

MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE:

NO ORAL ADVICE OR WRITTEN ADVICE GIVEN BY HOST OR ITS STAFF OR AGENTS SHALL CREATE A WARRANTY.

Host will not be liable for delay in delivery or performance of hosting or design services, and is excused from any failure to deliver or perform, due to causes beyond its reasonable control unless a specific level of service is guaranteed via a SLA.

Host will not be liable for any damage or inconvenience caused by any necessary or scheduled maintenance to Host's system, or for any service lapses or loss of customer data caused by forces beyond Host's reasonable control. Host recommends that User make archival copies or otherwise download any important information stored on Host's system, in addition to any backups Host may perform.

THE SOLE AND ENTIRE MAXIMUM LIABILITY OF HOST TO ANY USER FOR ANY AND ALL PROVEN LOSS, CLAIM, DAMAGE OR LIABILITY OF ANY KIND (INCLUDING BUT NOT LIMITED TO CONTRACT OR TORT) WITH RESPECT TO ALL SERVICES PROVIDED BY HOST AND ANY ACT OR OMISSION OF HOST WILL CONSIST OF A DUTY TO REFUND NOT MORE THAN THE AMOUNTS PAID BY THE USER TO HOST DURING THE YEAR PRECEDING SUCH LOSS, CLAIM, DAMAGE OR LIABILITY. IN NO EVENT WILL HOST BE LIABLE FOR ANY INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES, EVEN IF HOST HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

User, by signing this Agreement or connecting to the Host system, (a) accepts the use of the system/interconnection (including any programs, data, or services) "AS IS"; and (b) waives any and all claims relating thereto, whether such claims are against Host or any of its suppliers or affiliates.

Should any legal action or threat of legal action result as a result of User's use, or of any of Host's system, interconnection facilities, or services, User agrees to indemnify Host, its staff, or Host's other Users, for any costs incurred in defending against any such threat or action, including reasonable attorneys' fees and any equipment replacement costs, even if User is no longer a customer of Host when such expenses arise. This clause also applies to third party claims as well as any legal action taken by Host against User for breach of this Agreement, damage caused by User to Host's system, or for failure to pay expenses User is obligated to pay Host.

6. USE RESTRICTIONS AND INDEMNIFICATION. User agrees to adhere to Host's "Acceptable Use Policy", a copy of which is attached to this Agreement, and which policy may be changed from time to time - User agrees to adhere to all such changes it has notice of.

User will indemnify and hold Host harmless from any costs, expenses (including reasonable attorneys fees) or liability resulting from any claim based on User's use of the system. Such indemnification will not be applicable with respect to claims of gross negligence, willful misconduct or infringement by Host. Such indemnity will survive the termination or expiration of this Agreement.

7. GENERAL. No waiver of any breach of any provision of this Agreement will constitute a waiver of any prior, concurrent or subsequent breach of this Agreement or any provision thereof. If any provision of the Agreement is or becomes illegal or otherwise unenforceable, such provision will not invalidate the other provisions hereof, provided if Host determines that any such unenforceable provision is essential, it may terminate this Agreement upon notice.

User grants any permissions or licenses (including but not limited to copyright licenses), as may be required, and within User's power to grant, to Host in order to provide Internet and related services to User, or as may be required for Host to operate for User's benefit.

This Agreement is governed by the laws of the State of New Hampshire. The parties agree that the courts (state and federal) located in New Hampshire, will have non-exclusive jurisdiction to determine the validity, construction and performance of this Agreement and the legal relations between the parties.

This Agreement constitutes the entire Agreement between Host and User, and supercedes all prior agreements, proposals, representations, or other communications, relative to the subject matter hereof. Paragraph headings are included for convenience and are not to be used to interpret this Agreement.

Client Initials: 

1. LEGAL USES. Host's system and services may not be used in any way which violates Federal, State, Local, or International law. This prohibits, but is not limited to, any actions which are threatening, obscene, defamatory, or which violate trade secret, copyright or patent protection, or rights of privacy or publicity, or which result in the spread of computer viruses or other damaging programs or data files, or which violate any export restrictions (including making non-exportable information or software available to foreign nationals as may be prohibited by law). In the event User is suspended of any such violation, Host reserves the right to

This Agreement may not be assigned by User with the written consent of Host.

B. CHANGES IN LEGISLATION. Should any changes in legislation require any changes to this Agreement or any services provided by Host, Host reserves the right to make any such changes, as are determined necessary or prudent, at Host's sole discretion, without giving User advanced notice. If such changes are made, Host promises to send by electronic or postal mail notice of any changes in a reasonable time period. In event of such changes, User may terminate service without the required 30 day notice, but is not entitled to a refund of any payments already made for services.

Client Initials



NetCapital Hosting Order Form 112700

Form Rev. 03.10.a

3/4 d

161249013

16:58 / 2-11-2005



SERVICE ORDER FORM

Acct #

International Headquarters
1112 Boylston Street
Second Floor, PMB17
Boston, MA 02215

Representative: Tony Costa

CUSTOMER INFORMATION

Company Name: Netwire Inc.
Phone: (781) 925-1700
FAX: (781) 925-8545
New Customer
Existing Customer

Order Date: 12/13/2006
Requested Install Date: 12/21/2006

Service Address: 100 Technology Drive
City: Asheville
State: NC Zip: 28803

Billing Address: Box 277
City: Hingham
State: MA Zip: 02043

Administrative Contact: John W Fanning
Phone: 781-925-1800
Email: john@netcapital.com

Technical Contact: Peter Schmidt
Phone: _____
Email: peter@netwire.com

Billing Contact: John W Fanning
Phone: 781-925-1800
Email: john@netwire.com

Emergency Contact: Peter Schmidt
Phone: _____
Email: _____
Pager: _____

User Name: _____
Password: _____
How many IP addresses are needed: _____
Domain Name: _____

ORDERED

Shared Custom Dedicated
 Virtual Ded. Application Hosting
 Dedicated Co-Location
 Other

Space: NA
Monthly Service Fee: \$308.00
One-time set-up Fee: \$
Total cost for first month: \$308.00

Hardware Specifications / Service Inclusions

PE 2850 Dual 2.8GHz CPU, 4 GigDRAM, 3x73S03t Raid5,
100Mbps port, 10 Tests, Private IP addresses. Please do use
Credit Card # on file for this account.

Length of Service Agreement: 36 month term

Federal Tax ID# or Social Security# of responsible party:

Credit Card Info (Visa, Mastercard, American Express or Discover)

Card Number: _____
Expiration: _____
Name On Card: _____
Billing Address: _____

Bill Credit Card each month: YES NO

Invoice Quarterly (in advance) YES NO

Invoice Annually (in advance) YES NO

(10% discount excluded for annual pre-pay)

CLIENT APPROVAL

Peter Schmidt
Printed Name: _____
Signature: [Signature]
Title/Position: _____
Date: 12/14/06

NETRIPLEX APPROVAL

JOHANN HOPPE
Printed Name: _____
Signature: [Signature]
Title/Position: _____
Date: Dec 14 2006

Service Agreement

EBUSINESS HOSTING SOLUTIONS SERVICE SUBSCRIPTION AGREEMENT

1. **HOSTING SERVICES.** Host will provide connection to all organizations and individuals who agree to abide by Host's access terms, conditions, and fee schedules.

User is responsible for providing any equipment and/or software necessary to access Host's system and Internet facilities, unless otherwise provided for in this Agreement.

User is entitled to use any Internet services and time-share computer software provided by Host. User is responsible for any licensing fees for any "shareware" products provided by Host to User.

Host will provide the Hosting services provided in the service package chosen by User, and set forth on page one of the Service Order Form, including a server or space on a shared server, connection of the server to Host's high-speed Internet connection, backup of the server's hard disk and other maintenance on the server, domain name, e-mail, and file transfer services as provided in the chosen service package, automated server monitoring and limited log file generation and access. All equipment provided by Host shall remain Host's property.

The services and software offered are subject to change and limitation at Host's discretion, as is any pricing schedule. Host will notify User of any changes by electronic or postal mail to the agent named in this Agreement or other User officer a minimum of 14 days in advance, unless the change is judged by Host to be necessary to preserve proper security or functioning of Host's system. If User objects to any change in service, unless the change is one Host has determined is necessary for security purposes or to maintain proper operation of Host's system, User will be entitled to cancel its account.

User's continued use of the Hosting services after the effective date of such modified general terms and conditions, policies, or changes in services or software will constitute User's acceptance of such modified terms.

This Agreement covers only Internet services and any time-share software related to the provision of Internet services, Dedicated Hosting services, and any ancillary services such as domain name service and electronic mail.

2. **FEES.** User will pay (a) subscription fees in advance, (b) fees for other goods or services as invoiced, and (c) any security deposit, in each case per the applicable price schedule set forth on page one of the Service Order Form.

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(a) the accuracy, completeness, currentness, error-free nature, or fitness for any particular purpose of any data or services accessed on or through the Host system, or

(b) system performance levels, including but not limited to resource utilization, response time or overhead, unless such a performance guarantee is part of the chosen Hosting services package represented by a SLA, or

(c) any loss or inconvenience associated with Host's suspension, termination, or deletion of User's account, or

Client Initials: PS

(d) ANY OTHER WARRANTY, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

NO ORAL ADVICE OR WRITTEN ADVICE GIVEN BY HOST OR ITS STAFF OR AGENTS SHALL CREATE A WARRANTY.

Host will not be liable for delay in delivery or performance of hosting or design services, and is excused from any failure to deliver or perform, due to causes beyond its reasonable control unless a specific level of service is guaranteed via a SLA.

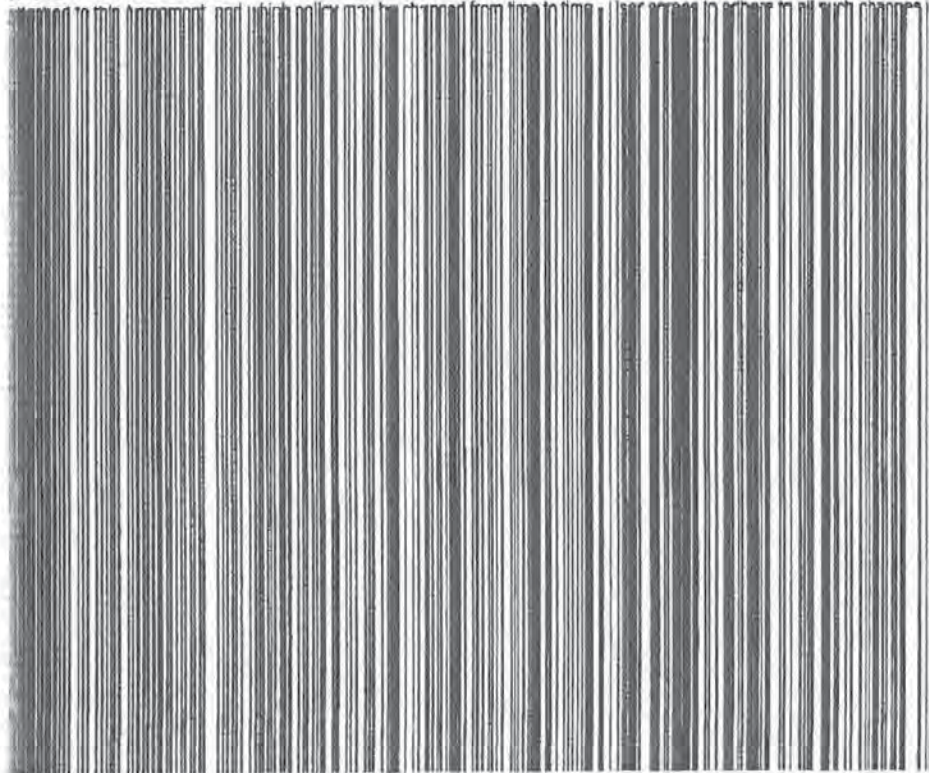
Host will not be liable for any damage or inconvenience caused by any necessary or scheduled maintenance to Host's system, or for any service lapses or loss of customer data caused by forces beyond Host's reasonable control. Host recommends that User make archival copies or otherwise download any important information stored on Host's system, in addition to any backups Host may perform.

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6. USE RESTRICTIONS AND INDEMNIFICATION. User agrees to adhere to Host's "Acceptable Use Policy", a copy of which is



CX0403

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0411

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0412

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0413

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0414

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0415

MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY

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CX0416

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0417

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0418

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0419

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0421

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

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CX0422

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

CX0423

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0424

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0425

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

CX0427

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0428

**MARKED CONFIDENTIAL
EXCEL SPREADSHEET
REDACTED IN ITS ENTIRETY**

(See CX0428 on DVD attached to
Complaint Counsel's Final Proposed Exhibit
List submitted on December 12, 2014)

CX0447

MARKED CONFIDENTIAL

From: "The Google Team" <removals@google.com>
Subject: Re: [#980912744] Your Request to Google
Date: March 7, 2012 10:41:25 PM PST
To: [REDACTED]

Hi,

Thanks for reaching out to us!

We have received your legal request. We receive many such complaints each day; your message is in our queue, and we'll get to it as quickly as our workload permits.

Due to the large volume of requests that we experience, please note that we will only be able to provide you with a response if we determine your request may be a valid and actionable legal complaint, and we may respond with questions or requests for clarification. For more information on Google's Terms of Service, please visit <http://www.google.com/accounts/TOS>

We appreciate your patience as we investigate your request.

Regards,
The Google Team

Original Message Follows:

From: [REDACTED]
Subject: Your Request to Google
Date: Thu, 08 Mar 2012 06:41:23 +0000

AutoDetectedBrowser: Safari 5
AutoDetectedOS: Intel Macintosh OS X
llLanguage: en
IssueType: lr_legalother
Language: en
agree: checked
companyname:
country_residence: US
dmca_signature: [REDACTED]
dmca_signature_date_day: 8
dmca_signature_date_month: 3
dmca_signature_date_year: 2012
full_name: [REDACTED]

geolocation: US
hidden_dmca_category:
hidden_product: websearch
legalother_explain: This page contains defamatory statements about me.
This page contains malicious false statements about me. The page says Quote : "

This guy is insane, pure and simple" This is a false defamatory statement under U.S. law. The statement is false and was made with negligence. The

page also says "[REDACTED] is a jerk" this is also a defamatory statement. Although I am not a famous person or public figure, the statement meets the legal criteria for defamation of BOTH a public figure

and a regular citizen.
url_box3_1: <http://www.jerk.com/profile.php?id=30136367>

CX0448

MARKED CONFIDENTIAL

From: [REDACTED]
Subject: Legal case
Date: March 7, 2012 11:03:45 PM PST
To: john [REDACTED]



Please be advised I will be filing a defamation suit against Jerk.com. Please remove my name from the site. Thank You [REDACTED]

CX0449

MARKED CONFIDENTIAL

From: "The Google Team" <removals@google.com>
Subject: Re: [#1025916050] Your Request to Google
Date: May 13, 2012 12:49:45 AM PDT
To: [REDACTED]

Hello,

Google.com is a US site regulated by US law. Google provides access to publicly available webpages, but does not control the content of any of the billions of pages currently in the index. Given this fact, and pursuant to section 230(c) of the Communications Decency Act, Google does not remove allegedly defamatory material from our search results. You will need to work directly with the webmaster of the page in question to have this information removed or changed. If you haven't yet worked with the webmaster, please visit <http://google.com/support/bin/answer.py?answer=506> for more information. Once the material has been modified on the site in question, Google's search results will automatically reflect this change after we next crawl the site.

We are sorry we cannot assist you further at this time.

Regards,
The Google Team

Original Message Follows:

From: [REDACTED]
Subject: Your Request to Google
Date: Sun, 13 May 2012 07:49:43 +0000

AutoDetectedBrowser: Safari 5
AutoDetectedOS: Intel Macintosh OS X
llLanguage: en
IssueType: lr_legalother
Language: en
agree: checked
companyname:
country_residence: US
dmca_signature: [REDACTED]
dmca_signature_date_day: 13
dmca_signature_date_month: 5
dmca_signature_date_year: 2012
full_name: [REDACTED]
geolocation: US
hidden_dmca_category:
hidden_product: websearch
legalother_explain: Contains defamatory content that is illegal in California.
legalother_quote: contains photo and content says "this guy is insane pure and simple and" this guy did a bunch of drugs.
Cyberbully has started a gmail account in my name as well.
url_box3_1: [http://www.jerk.com/\[REDACTED\]-p30136367.html](http://www.jerk.com/[REDACTED]-p30136367.html)

CX0449-001

CX0450

MARKED CONFIDENTIAL

1 FEDERAL TRADE COMMISSION
 2 I N D E X
 3
 4 WITNESS: EXAMINATION:
 5 [REDACTED]
 6 BY MS. FANG 4
 7
 8 EXHIBITS DESCRIPTION FOR IDENTIFICATION
 9 Number CX 447 3/7/12 Response from Google 35
 Team to [REDACTED]
 10 Number CX 448 3/7 E-mail from [REDACTED] 38
 to John Fanning
 11
 12 Number CX 449 5/13/12 Response from Google 42
 Team to [REDACTED]
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1
 2 UNITED STATES OF AMERICA
 3 BEFORE THE FEDERAL TRADE COMMISSION
 4
 5
 6 In the Matter of)
 7 JERK, LLC, a limited liability company,)
 8 also d/b/a JERK.COM, and) Docket No. 9361
 9)
 10 JOHN FANNING,)
 11 individually and as a member of)
 12 JERK, LLC.)
 13 _____)
 14
 15 Monday, November 3, 2014
 16 901 Market Street, San Francisco, California
 17
 18
 19 The above-entitled matter came on for
 20 investigational hearing, pursuant to notice, at
 21 10:32 a.m.
 22
 23
 24
 25

CX0450-001

CX0450-002

1 APPEARANCES:
 2 ON BEHALF OF THE FEDERAL TRADE COMMISSION:
 3 YAN FANG, ATTORNEY
 BORIS YANKILOVICH, ATTORNEY
 4 Federal Trade Commission
 901 Market Street, Suite 570
 5 San Francisco, California 94103
 415.848.5100 Fax 415.848.5184
 6 E-mail: yfang@ftc.gov
 byankilovich@ftc.gov
 7
 8 Also Present: Denise Martinez
 9
 10
 11
 12
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 22
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 24
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CX0450-003

1 P R O C E E D I N G S
 2
 3 Whereupon,
 4 [REDACTED]
 5 a witness, called for examination, having been first duly
 6 sworn, was examined and testified as follows:
 7 EXAMINATION
 8 BY MS. FANG:
 9 Q Good morning. I know you just told Teri your
 10 name. Could you tell us your full name again, please?
 11 A Yes. My full name is [REDACTED]
 12 Q And what is your address?
 13 A [REDACTED] San Francisco,
 14 California 94110.
 15 Q Okay. And are you represented by counsel?
 16 A No.
 17 Q Now, Teri just administered an oath this
 18 morning. What does this oath mean to you?
 19 A It means I will be entirely truthful and factual
 20 regarding all the questions you ask me today.
 21 Q Okay. And it sounds like you understand that a
 22 promise to tell the truth is a promise to truthfully and
 23 also completely answer my questions today?
 24 A Yes.
 25 Q Okay. So I'm going to be asking you various

CX0450-004

1 questions this morning. If you are not sure of an answer
2 or you don't have a complete answer, then you must still
3 answer the question to the extent that you can. Do you
4 understand?

5 A Yes.

6 Q And if you hear a question and you don't know or
7 you don't remember the answer necessary to answer the
8 question, you can say so. Does that make sense?

9 A Yes. Yes.

10 Q And at some point I may ask a question that is
11 not clear or that you don't hear or understand. Will you
12 agree to let me know if there's anything about my
13 question that isn't clear or understood by you?

14 A Yes, I agree.

15 Q As the day goes on you may also realize that an
16 earlier answer you gave was inaccurate or was incomplete.
17 If that happens, will you agree to say that you want to
18 correct or supplement your earlier answer?

19 A Yes.

20 Q And you may also want to take a break to use the
21 restroom to get a drink of water or just to stretch your
22 legs. We can take a break as soon as you finish
23 answering a pending question. Do you understand?

24 A Yes.

25 Q As you can see, the court reporter is recording

CX0450-005

1 all that is said here. Because she can own record our
2 words, it's important that you say your answers out loud
3 or verbally when you answer the questions. Will you
4 speak all of your answers so that they can be accurately
5 recorded?

6 A Yes.

7 Q And now I'm going to take a few minutes to ask
8 you some questions to make sure you can listen and answer
9 my questions today.

10 Have you taken any medications that would affect
11 your ability to truthfully and completely answer my
12 questions today?

13 A No.

14 Q Do you have any health issues that would prevent
15 you from truthfully and completely answering my questions
16 today?

17 A No.

18 Q Have you taken any alcohol or drugs?

19 A No.

20 Q Did you get enough sleep last night?

21 A Yes.

22 Q And is there any other reason why you can't
23 answer my questions during the deposition today?

24 A No.

25 Q Let's begin by talking a little bit about your

CX0450-006

1 background. What is your current occupation?

2 A I'm a hardwood floor contractor.

3 Q And how long have you been a hardwood floor
4 contractor?

5 A Ten years.

6 Q And are you currently employed with a company or
7 are you self-employed?

8 A I am self-employed. I own my own company.

9 Q Okay. And how long have you owned your own
10 company?

11 A Ten years.

12 Q And what is your company?

13 A [REDACTED]
14 [REDACTED]

15 Q Okay. And is [REDACTED] based in
16 San Francisco?

17 A Yes.

18 Q You're here to answer questions about your
19 experience with the website Jerk.com which is the subject
20 of this suit giving rise to the deposition today. Did
21 you look at any documents to prepare for today's
22 deposition?

23 A No.

24 Q Did you look through any e-mails or review --

25 A Yes, actually, I did look at the three e-mails,

CX0450-007

1 and I believe I looked at a statement that I made to you
2 guys about a year ago and -- no, two years ago. But I
3 looked at that only once about a week ago, so -- yeah,
4 that's the only documents I've looked at.

5 Q Okay. So you looked at e-mails and then you
6 also looked at the declaration you signed two years ago?

7 A Exactly.

8 Q Okay. Did you speak to anyone about the
9 deposition today?

10 A No.

11 Q I know that we spoke last week briefly --

12 A Oh --

13 Q -- did you speak with anyone --

14 A Anyone else?

15 Q Right.

16 A No. I only told my girlfriend that I was going
17 to do this deposition, but that's all.

18 Q Okay.

19 A Yeah.

20 Q And let's now begin to talk about Jerk.com.

21 Now, when did you first learn about the website Jerk.com?

22 A I found it during a search of my name on Google
23 search engine.

24 Q Okay. And when did you first -- when did you do
25 that search?

CX0450-008

1 A I believe that was around December '0- --
 2 December '11 or January '12.
 3 Q Okay. So you were doing a search of your name
 4 in December 2012 or January -- or December 2011 or
 5 January 2012 and --
 6 A Yeah -- actually -- wait. I think I have to
 7 correct that. Around -- I'm not positive, but maybe
 8 around February or March '12, 2012, I first found
 9 Jerk.com.
 10 Q So I understand, it sounds like you can't quite
 11 remember when --
 12 A I can't, yeah.
 13 Q Okay.
 14 A Yeah, but thinking about it -- thinking about
 15 it, yeah, I guess it would have been January 2012.
 16 Q Okay.
 17 A Somewhere in there.
 18 Q Okay. So around --
 19 A I'm not entirely certain, but I believe that's
 20 when it was.
 21 Q Okay. And so you said you did a Google search
 22 of your name?
 23 A Yes.
 24 Q And what did you see when you did the Google
 25 search?

CX0450-009

1 know, somebody else might see it, a friend or family
 2 member or something. But mainly -- my main concern was
 3 that I could, you know, potentially lose customers
 4 because of this.
 5 Q Uh-huh. Now, you said when you first saw the
 6 search results you saw a red line that said, "[REDACTED] is a
 7 jerk." Was that in the search results below the Google
 8 search?
 9 A Yes, I believe it was. It just -- the main
 10 heading was "[REDACTED] is a jerk."
 11 Q Okay.
 12 A And then there was some other, you know,
 13 lettering behind that.
 14 Q And do you remember whether it was the first
 15 search result or the second or fifth?
 16 A I believe it was -- it was the first search
 17 result, yeah. I know it was either the first or the
 18 second, but I know -- I think -- okay, it could have been
 19 the second search result, and then later it jumped up to
 20 the first search result, as I kept checking it and I told
 21 some of my friends about it and then they looked at it,
 22 and I guess, you know, more people looking at it made it
 23 jump up to the first one, I'm assuming. So I sort of
 24 tried to stop looking at it and encouraged my friends not
 25 to look at it so that there would be less hits to that

CX0450-011

1 A I saw a heading "[REDACTED] is a jerk." And
 2 that immediately caught my attention, and so I clicked on
 3 it and it took me to the Jerk.com website.
 4 Q And what did you see when you got to the Jerk
 5 website?
 6 A I saw a profile in my name created -- that had
 7 some statements that were extremely defamatory against me
 8 on that, and the you know, typical Jerk.com format where,
 9 you know, there's a place for a picture, there was some
 10 identifying information about me, like my name, city that
 11 I resided in, my age, an e-mail for me, and then there
 12 was, you know, a place where people could vote if I was a
 13 jerk or if I was not a jerk and give a thumbs up or a
 14 thumbs down, and there was some statements saying really
 15 damaging things, like that I was really stupid and I
 16 think -- I can't remember exactly what they all said.
 17 But I think there's one in the e-mail saying
 18 that I had done like way too many drugs or something of
 19 that nature, and just a lot of really, you know, false
 20 and damaging defamatory statements, yeah, uh-huh.
 21 Q What kind of was your reaction when you first
 22 saw the profile?
 23 A I was concerned that one of my clients, one of
 24 my customers for [REDACTED] would see those
 25 statements and potentially not hire me. And also, you

CX0450-010

1 entry and then maybe drop down. Which didn't really work
 2 that much, but a little bit maybe over time.
 3 Q So the first time you looked at, your search
 4 result was either No. --
 5 A It was No. 2.
 6 Q -- it was No. 2?
 7 A I think it was No. 2 honestly, yeah.
 8 Q Okay. So were you describing your profile and
 9 you said it was kind of a picture -- had a place where
 10 pictures usually are --
 11 A Yeah.
 12 Q -- and then other information. So what
 13 information did it have of kind of you specifically?
 14 A It didn't have a lot. It had my full name
 15 correctly spelled, that I resided in San Francisco, and
 16 it had my correct age, and it had an e-mail address for
 17 me, and that was it.
 18 Q That was it?
 19 A Uh-huh.
 20 Q And so for the other information with the
 21 comments that you described --
 22 A And then the comments, right, right.
 23 Q Okay. And do you remember if the profile had
 24 any advertisements or links to the site?
 25 A I can't remember.

CX0450-012

13

1 Q Do you remember if there were any votes?
 2 A There were votes, yes.
 3 Q Do you remember what the votes were?
 4 A No. But they were in -- it was structured in
 5 such a way that if you had more negative votes and
 6 positive votes you were quote, a jerk, and so I had, you
 7 know, the negative votes. I guess I only had -- when I
 8 initially discovered it, I only had a couple, you know,
 9 negative votes, but it still made me a jerk technically
 10 on the site.
 11 Q Okay. And by "it made me a jerk on the site,"
 12 what do you mean?
 13 A Well, they either -- the heading said, "[REDACTED]
 14 [REDACTED] is a jerk," and then the other option on some of
 15 the other profiles I looked at was "is not a jerk," so --
 16 Q Okay.
 17 A -- you know, it sort of computerized tallied up
 18 your votes and then decided from, you know, the vote
 19 tally if you were a jerk or you weren't according to the
 20 website.
 21 Q Okay. So for your profile then, the profile
 22 labeled "[REDACTED] is a Jerk"?
 23 A Uh-huh.
 24 Q And did your profile have any other information?
 25 Did it have a phone number?

CX0450-013

14

1 A No.
 2 Q Did it have an e-mail address?
 3 A It did.
 4 Q And what was the e-mail address on --
 5 A It was an e-mail address that didn't belong to
 6 me, and that e-mail address was [REDACTED]
 7 [REDACTED]
 8 Q Okay. On so that e-mail address wasn't actually
 9 your --
 10 A It was not my e-mail address, no.
 11 Q You mentioned that you saw, you know, a few of
 12 the other profiles. Did you look at anything else on the
 13 website the first time you visited?
 14 A Yeah, I looked at a lot. One of the things I
 15 looked at was whether or not I could be removed, and
 16 there was a statement saying, you know, this was a public
 17 forum and that people were able to vote and that there
 18 was -- it was up to -- sort of up to the public I guess
 19 to vote, and so they wouldn't remove anything because it
 20 was a -- just whatever the public decided was the truth
 21 and it needed to stay on the Internet.
 22 So that sort of disturbed me because I really
 23 wanted the information off of the site. I felt it wasn't
 24 true and -- so --
 25 Q Right. Do you remember checking out any other

CX0450-014

15

1 sections of the website?
 2 A Yeah, I did. I visited the site quite a few
 3 times after that and I checked it out thoroughly and
 4 looked at other peoples' profiles, looked at the rules of
 5 the site, and just pretty much clicked on everything that
 6 was available, although I don't remember all of what that
 7 was, but I did, I thoroughly examined the website, yes.
 8 Q Do you remember -- you said you've looked at the
 9 rules on the website. Do you remember what the rules
 10 said? Or what --
 11 A Only vaguely, and I remember them vaguely
 12 stating that I would not be able to remove the -- that no
 13 one could be removed from Jerk.com and -- but it also
 14 said stuff like you could vote and you could have, you
 15 know, a say in Jerk.com, and there was also a section I
 16 think where I could join the website, pay a fee, and at
 17 that point I would have a chance to register my, you
 18 know, feelings about the -- my profile -- I would have
 19 access to my profile somehow, I believe it said, and --
 20 so yeah.
 21 Q Now, when you saw your profile, did you think
 22 someone had created the profile of you?
 23 A I did, yes.
 24 Q And who did you think had created the profile?
 25 A Well, at the time I had a dispute with a client

CX0450-015

16

1 with a -- you know, I think it was about \$1,600, and then
 2 I had found out that that client had also not paid a
 3 large number of other contractors and they -- the
 4 other -- I had contacted the other contractors and they
 5 all sort of wanted to have like a class action suit
 6 against this client. And so I was sort of involved in
 7 that at that time, and I felt like it was potentially
 8 that client putting negative comments on the Internet to
 9 try and intimidate me and they were using the Jerk.com
 10 platform to intimidate me legally. That's what I
 11 initially thought.
 12 Q Did you think it was anyone -- could have been
 13 anyone else?
 14 A Yes, I did consider that it was my landlord or a
 15 neighbor that was also -- I was having some difficulties
 16 with, uh-huh.
 17 Q Okay.
 18 A Yeah.
 19 Q And were there any specific reasons you thought
 20 it was those two?
 21 A Only because I had no other conflict with anyone
 22 and couldn't imagine anyone else saying such, you know,
 23 negative statements about me, and I had -- those were the
 24 only two people I could think of that would do such a
 25 thing, you know. Yeah.

CX0450-016

1 Q Now, you mentioned that you had visited the
2 website quite a few times. Can you estimate, you know,
3 just about how many times you visited the site?

4 A That's hard to say. In total, from the time
5 that I first discovered it --

6 Q Right.

7 A -- until I found that it was -- my name was
8 taken off of the site, it must have -- it would be --
9 it's a hard number to estimate. I would say a hundred --
10 around a hundred roughly.

11 Q Okay.

12 A Uh-huh, yeah.

13 Q And do you remember how long you spent kind of
14 on each visit? Do you remember on your first visit, how
15 long you were on the website?

16 A No, I can't remember exactly the times, you
17 know.

18 Q Could it have been like five minutes or more
19 like half an hour?

20 A Maybe initially, when I first saw it, I may have
21 spent, you know, five or ten minutes.

22 Q Okay.

23 A And then I would -- I was like upset and maybe
24 talked to my friends about it, and then got back on it
25 and spent another 20 minutes or something.

CX0450-017

1 to get that off, yeah. I spent a lot of time, uh-huh.

2 And I tried a lot of things, I mean, as
3 evidenced by those three letters, I tried twice with
4 Google to send them take-down notices and complaints and
5 stuff like that, and I sent a thing to John Fanning,
6 which I figured probably wouldn't work but I was going to
7 try it anyway, just in case.

8 Yeah, so I did a lot. And then I tried to join
9 Jerk.com at least twice, I believe, and maybe more than
10 that, uh-huh.

11 Q Okay. Would you estimate that it was, you know,
12 like ten hours that you spent, or more like 50 hours
13 or --

14 A Yeah, more like 50. 50 plus, yeah.

15 Q Okay. Now, you said you probably visited, you
16 know, a hundred --

17 A Maybe, you know -- sorry to interrupt you.
18 Maybe more like 70 hours altogether I put into it.

19 Q Okay. The 70 hours including the times you
20 visited and --

21 A Yeah, I spent a lot of time researching, you
22 know, and then in talking to people and just, you know,
23 looking at the site, going back, checking. Then a lot of
24 times I would try and check Google, but I wouldn't go to
25 the site exactly, but I would just see if it was still on

CX0450-019

1 Q Okay.

2 A I remember initially -- when I first initially
3 saw it, I checked it frequently, like is this -- what's
4 going on? And then I started researching it on Google
5 and found that other people were having issues with the
6 site and, you know, started trying to research a way that
7 I could get my name taken off the site and things like
8 that.

9 Q And if you were to estimate how long you spent
10 doing all that -- doing the research and visiting the
11 site, about how --

12 A Oh, yeah, that's quite a bit of time I spent.
13 Yeah, I did a lot of research. I read -- there was a lot
14 of information on a Google forum where people -- it was
15 like a thread and people were sharing their experience
16 with Jerk.com, and some were saying how unethical it was
17 and others were saying, Oh, well, whatever, you should
18 just accept it, and others were saying I was able to get
19 myself removed because I joined Jerk.com and I paid the
20 fee and took my name off, and other people were saying
21 you could write Google and ask for a take-down notice and
22 they would remove your name.

23 And so I just -- I spent hours and hours
24 actually researching that, I did, and I really felt like
25 it threatened my business, and so it was important to me

CX0450-018

1 the Google search engine. I spent a lot of time, yeah.

2 Q Okay. And during the times you were checking,
3 do you remember where you were in the -- kind of the
4 search results?

5 A Yeah, it fluctuated. You know, I think it
6 started off where I was like No. 2 when I first noticed
7 it, and then as I looked at it more -- I kept looking at
8 it, and then I sort of I guess created my own problem
9 because I had so many hits on it because I looked at it
10 so much, then it moved up one, and then the day that
11 happened, I was pulling my hair out when I realized what
12 I had done. So at that point I started trying to look at
13 it more covertly, you know.

14 So, yeah, and then I also had told my friends,
15 Just don't look at it. At one point I had told a good
16 friend of mine about it and she had told her mother,
17 who's, you know, fond of me, and her mother got on the
18 site and wrote a rebuttal to the negative comment saying
19 that I was a good person and these people were really
20 unethical for using this site and for misrepresenting me
21 on the site. So there was one, you know, positive
22 comment from her on the site.

23 So then I asked my friends to just stop
24 accessing the site because I moved up to No. 1, so --

25 Q So from the time you saw the profile until the

CX0450-020

1 time that you saw it was no longer up in the search
2 results, it was always one of the top one or two?

3 A No, after sometime -- I would say maybe back
4 in -- when would that be? So I saw it in 2012 -- I would
5 say it dropped down a few notches in maybe that summer --
6 Q Okay.

7 A -- to like three or something like that. And I
8 was -- you know, I really felt positive about that. And
9 then I think I tried to also see if I could get hits to
10 other, you know, sites that had my name so it would bump
11 it even farther down. So that's more time that I didn't
12 even think of, you know, doing that.

13 And then over -- you know, it just gradually
14 dropped down to where I started noticing it was at like
15 No. 6 towards the end, and No. 7, quite a bit down from
16 there. And that made me happy because it wasn't the
17 first thing that people would see when they Googled me.
18 I was still upset that it was on the search engine.

19 And then I think finally this year, around maybe
20 April or May, I'm not positive, I noticed that it was no
21 longer up. And then I went to the site and I saw that my
22 name wasn't -- or actually, I think I got an e-mail from
23 Sarah Schroeder from the FTC saying that they had made
24 some progress or something in the case, and that's when
25 I -- I had kind of given up looking at it at that point,

CX0450-021

1 The Hardwood Flooring Magazine. That was another Google
2 entry, yeah.

3 Q So it sounds like you had -- you said there was
4 one for your [REDACTED] --
5 A Yeah.

6 Q -- for your company?

7 A Right.

8 Q And then for a trade social article you wrote on
9 flooring?

10 A Yes.

11 Q And then for your donation work?

12 A Yes, Global Garden, was the name of that entry.

13 Q Okay. So at least two of those had to do with
14 your work?

15 A That's correct.

16 Q Okay. And for the [REDACTED] entry,
17 was that -- do you remember what that link was to?

18 A Yes, it was to the website Yelp.com.

19 Q Okay. And what was on the Yelp.com website?

20 A All of my -- it said Yelp and it had five stars
21 and all of my reviews that were, you know, posted by my
22 customers.

23 Q So was it a review?

24 A Yeah, Yelp is a review site and, yeah -- and
25 there were just -- it just enables people to review

CX0450-023

1 and then I looked again and I saw that it was no longer
2 there. And I was really happy about it, yeah.

3 Q So it sounds like the search results
4 fluctuated --

5 A They did.

6 Q -- but it still stayed on the first page of the
7 search results?

8 A For a long time, yeah, it stayed -- I believe
9 the whole time it was on the first page. I don't think I
10 ever remember seeing it going to the second page.

11 Possibly towards the end, but I'm not positive.

12 Q Okay. So before you saw the Jerk profile and
13 the Jerk headlines in the search result, had you done a
14 Google search of your name before?

15 A Yes.

16 Q Okay. And what did those results look like?

17 A The No. 1 entry on Google prior to the Jerk.com
18 incident was for my business, [REDACTED] And then
19 I think there was another one that was for some donation
20 work that I'd done, and then -- let me see, what were the
21 other ones? I can't really remember. Yeah, I'm not
22 sure.

23 Q So the result you said --

24 A Oh, yeah, there was one also I believe for some
25 stuff I'd written in a trade journal for hardwood floors.

CX0450-022

1 businesses, and there was, you know, quite a few reviews.
2 There's some reviews of my business on Yelp.

3 Q Right. And did the review also mention -- did
4 they mention your name?

5 A Yes, they did, uh-huh.

6 Q So they were for [REDACTED] and for [REDACTED]
7 [REDACTED]

8 A Yes, uh-huh.

9 Q And you said there were five stars for the
10 review?

11 A Uh-huh, yes.

12 Q And so did you have -- I mean, were the reviews
13 positive?

14 A They were all positive, yes.

15 Q And so you said that the top one for the company
16 in the search result before you saw the Jerk.com was for
17 Yelp?

18 A Yes. So I felt like up until Jerk.com, I had a
19 really -- you know, my company and myself had a good
20 reputation online. And then once I saw the Jerk.com
21 thing, it really just, you know, destroyed that. And so
22 they say for any business, your online reputation is
23 really important right now, so I was concerned.

24 Q Right. Was your kind of online -- were you
25 concerned about your online reputation in the 2012 -- or

CX0450-024

1 that time when you first saw the profile?
 2 A Yes, uh-huh, yeah. Yeah, I felt like I had a
 3 great online reputation until I saw that, uh-huh.
 4 Q And do you have -- do you get customers from
 5 your online reviews?
 6 A All my customers from Yelp, pretty much. I
 7 would say 97 percent of them come from Yelp.
 8 Q Okay.
 9 A Uh-huh, yeah. They all come from online.
 10 Q Okay. And so did a lot of your customers come
 11 from online in 2012 --
 12 A Yes.
 13 Q -- as well?
 14 A Yes.
 15 Q Okay. So were you concerned that your customers
 16 would then see the Jerk.com search result?
 17 A Yes, absolutely.
 18 Q And sometimes it was above the Yelp.com search
 19 result?
 20 A Yes.
 21 Q Do you think that the Jerk.com -- do you know if
 22 it affected your business, the Jerk.com profile?
 23 A Well, I can't say definitively, but I believe it
 24 did, yes.
 25 Q And why do you think that?

CX0450-025

1 that question.
 2 Q Okay.
 3 A I can't say for sure. I have to think about
 4 that. I can't remember anyone -- well -- yeah, I'm just
 5 going to leave it I'm not certain about that.
 6 Q Okay.
 7 A It's possible. It's possible, uh-huh. I do
 8 recall I think having at least one conversation with a
 9 customer about it and asking them if they weren't hiring
 10 me because of it, or something of that nature. But I'm
 11 not sure that any customer came to me and said, "Look,
 12 we're not hiring you because we saw this."
 13 Q Okay.
 14 A So -- yeah.
 15 Q So you can't remember, but maybe --
 16 A I can't remember.
 17 Q But do you remember if you talked to any
 18 customers about the Jerk.com profile?
 19 A I believe that I may have asked two of them
 20 about it, yes. If they had seen that or if it had -- or
 21 I told them, you know, not to factor in when they were
 22 considering hiring me, or something like that, uh-huh.
 23 Q Do you remember what their reactions were? Do
 24 you remember if they had seen it?
 25 A I think that both of the ones I talked to

CX0450-027

1 A Well, I think that -- a lot of my floor jobs are
 2 a considerable sum of money. I have jobs sometimes that
 3 are 30, 40, \$50,000 for the net cost, and I feel like if
 4 you're looking up someone online to hire them and you
 5 don't know really know them before you give them \$50,000,
 6 you might research them a little bit. And so I felt like
 7 at that time, you know, it was quite probable that some
 8 of my customers would look on Google to sort of check out
 9 my reputation and might see the Jerk.com thing. So --
 10 yeah.
 11 Q Uh-huh. When you found your profile, how was
 12 your business at the time? Was it -- you know, were you
 13 having a lot of customers? You said at that time a lot
 14 of customers also came from online reviews.
 15 A Yeah, my business was doing well. It was doing
 16 really well. There was a recession at the time and a lot
 17 of, you know, my colleagues were having a lot of trouble,
 18 but I was actually doing -- considering the construction
 19 climate, I was doing pretty well, uh-huh. I managed to
 20 stay in business throughout all of that and some of my
 21 colleagues didn't.
 22 Q Okay. And so did you -- you said you think the
 23 profile affected your business. Did any customers tell
 24 you, or did anyone come up to you and say, "I saw" --
 25 A That's a good question. I'm not certain about

CX0450-026

1 said -- well, I think I remember one -- one of 'em
 2 saying, "I wouldn't base my decision on that," on, you
 3 know, "negative comments from your website" -- you know,
 4 "on another website." And then I don't remember the
 5 other reaction.
 6 Q Okay. And usually when, you know, people come
 7 to you through Yelp, do they tell you that, "Oh, I saw a
 8 great review of you on Yelp"? Is that how you know they
 9 came through Yelp?
 10 A Quite frequently, yes.
 11 Q Now -- so you mentioned that, you know, the Yelp
 12 result was on top for awhile, and then you saw the
 13 Jerk.com profile, and at that time the Jerk.com
 14 profile -- when you first saw it, the search result was
 15 No. 2?
 16 A Yes.
 17 Q And then at some point you said that the Jerk
 18 search result, or the Jerk link was the -- became the top
 19 search result?
 20 A Yes.
 21 Q Do you -- so that then it was above the Yelp
 22 search result?
 23 A Yeah.
 24 Q Do you remember how long the Jerk link was above
 25 the Yelp?

CX0450-028

1 A No, I don't remember, no.

2 Q Was it for kind of the majority of the time
3 between when you found it -- found your -- the Jerk link
4 to when you noticed the link wasn't up?

5 A If I had to estimate, I would say it was
6 probably like that from, you know, February 2012 until
7 maybe the fall of 2012, or midsummer, something like
8 that. But I'm really not sure. I'm not sure, yeah.

9 Q Okay. But it was -- you feel like --

10 A It was a considerable amount of time.

11 Q -- like it was a few months?

12 A A few months at least. That's a great way to
13 put it, uh-huh.

14 Q So at least two or three months?

15 A Yeah, I would say so.

16 Q I'm going to ask for a break.

17 A Okay.

18 (Recess.)

19 BY MS. FANG:

20 Q We're back on the record.

21 A Okay, great.

22 Q You're still under oath.

23 So, you know, before we took a break we were
24 just talking about the different search results.

25 A Yeah.

CX0450-029

1 write John Fanning at this e-mail address and threaten to
2 have a defamation suit, you will get this removed, or
3 might get this removed. And I thought, well, it doesn't
4 sound likely, but it's worth a try, so I did do it.

5 Q Okay. Did you think that John Fanning was
6 responsible for the website?

7 A I mean, I didn't know. I read a lot about it
8 and apparently he was, you know, definitely involved in
9 it, and I don't know if he was completely responsible or
10 if he had partners. I think there was some mention of
11 that in the stuff I read. But it sounded like he was one
12 of the key players in the website, but I wasn't positive.

13 Q Did you find any other, you know, e-mail
14 addresses or names that -- to contact?

15 A I'm not sure. It seems like there were some,
16 yes, but I can't recall that at the time. I don't know
17 exactly who that would have been. I know they talked
18 about his wife and they talked about I think another
19 business partner or something like that. I don't
20 remember who that was. But there was a lot of
21 information about the site on Google, uh-huh.

22 Q On the Google forum?

23 A Google forum, and other sites too. I can't
24 remember the names of the other sites. But there was a
25 lot on Google forums. I remember that name, but there

CX0450-031

1 Q Kind of in your view, do you think that the Jerk
2 search results and Yelp search results were competing for
3 your customers' attention?

4 A Yes, absolutely. Particularly when they were
5 right next to each other. I was really concerned for
6 that, uh-huh.

7 Q And then -- so because of your concern, did
8 you -- you tried to get your profile on Jerk.com removed?

9 A Yes.

10 Q Now, what were some of the ways you tried to get
11 your profile removed? Did you e-mail the website
12 Jerk.com?

13 A Yes.

14 Q And how did you e-mail them?

15 A Well, I had read on the -- one of the Google
16 forums I believe that if you wrote them a e-mail saying
17 that you were going to file a defamation suit against
18 them, there was a chance they would remove you. So I
19 tried that, not thinking that it would work for sure, but
20 it was worth a try, because basically I was kind of
21 desperate to get it removed.

22 Q And do you remember who you contacted?

23 A Yeah, on the Google forum there was a e-mail
24 address for John Fanning, and I sent that e-mail to John
25 Fanning. And somebody had written on the forum, if you

CX0450-030

1 were several other sites that had information on Jerk.com
2 as well.

3 Q And how did you decide to contact the John
4 Fanning? You know, e-mail address? Did that name come
5 up a few times or --

6 A Yeah, I saw the John Fanning name -- in pretty
7 much most of my research about Jerk.com I saw that name
8 come up. And then there was one entry on the Google
9 forum giving his address and saying that you have this
10 chance of having it removed if you wrote this address, so
11 I did that, uh-huh.

12 Q Okay. So it sounds like in the research that
13 did you, the John Fanning name came up more often?

14 A It did come up a lot, yes.

15 Q Okay.

16 A Yeah, more than any other name for sure, yeah.
17 It -- usually what I would read is that he was
18 responsible for the site or he was in charge of it or he
19 owned it, something of that nature, uh-huh.

20 Q And so you -- did you e-mail him?

21 A I did, uh-huh.

22 Q And did you get a response to your e-mail?

23 A No.

24 Q And did you try any other -- did you contact
25 anyone else about removing the Jerk.com profile?

CX0450-032

1 A Yes, I contacted Google. On two occasions I had
2 tried. Both times it didn't work.

3 Q And what was your request to Google?

4 A I asked Google to remove the entry, and there
5 was something I had read in my research about taking a
6 take-down notice to Google. I'm not sure exactly what
7 the process was for that, but I followed that process,
8 and that was basically my request with Google. And they
9 had -- they had different questionnaires that you could
10 ask and you'd click a button, it would lead you this next
11 part, you know, sort of a menu, and so they could get
12 your -- you know, a grievance or your comments or
13 whatever.

14 And I went through that whole process, and I
15 received a response from Google saying that they weren't
16 going to take the entry down. And then I was really
17 frustrated when that happened and so, you know, I
18 continued to do more research on such, and I thought,
19 well -- later, I'm not sure what the dates were between
20 that, but I thought, Well, you know, let me try that
21 again. Because I was really kind of just grasping at
22 straws trying anything to get it off the site because I
23 really felt like it was going to impact my business,
24 uh-huh.

25 Q Did you contact -- well, I'm curious, why did

CX0450-033

1 uh-huh.

2 Q And did you get a response from Google?

3 A I did, uh-huh.

4 Q And what was -- you said you contacted Google
5 twice. What was their response?

6 A I don't remember exactly. It's in the e-mails
7 that I gave you. I haven't looked at 'em really closely,
8 but I do remember it was that they weren't going to take
9 the citation off of their search engine, so -- but I
10 don't know exactly what they said.

11 MS. FANG: I'm going to hand to Mr. [REDACTED] what
12 we've marked as CX0447-001.

13 (FTC Exhibit CX 447 marked.)

14 BY MS. FANG:

15 Q Mr. [REDACTED] I'm showing you what we've now
16 marked as CX-447. Do you recognize this document?

17 A Yes.

18 Q What is it?

19 A It's my response from the Google team to my
20 request that they remove the Jerk.com citation about me.

21 Q And is this document the e-mail that you brought
22 in this morning?

23 A Yes.

24 Q And so you said -- what is the date of the
25 e-mail?

CX0450-035

1 you decide to contact Google? Was it to remove it from
2 their search results?

3 A Yes. Yes. Hopefully that they would, you
4 know -- I had -- I think -- I don't remember exactly, but
5 I believe it was for two reasons. One, that they would
6 remove it from the search results, and two, that they
7 would consider removing the site entirely.

8 But I'm not sure if that's right or not, but I
9 believe that's what my intentions were, uh-huh, yeah.

10 Q Okay.

11 A Definitely the first, the former. I was
12 definitely hoping they would remove it from the search
13 engine results. That was my main goal.

14 Q And that's because you were concerned about --
15 of your customers searching Google and seeing that search
16 result?

17 A Yes, exactly.

18 Q And did you receive a --

19 A Actually, I also felt like it was really a sort
20 of unethical site and felt, you know, that there were a
21 lot of other people in my condition -- in my situation.
22 And I was also feeling that it just was unethical and I
23 was trying to tell Google, Hey, take this off for a lot
24 of people. I read that children were being harassed
25 because of the site. So I had that intention as well,

CX0450-034

1 A The date is March 7th, 2012.

2 Q And it's from?

3 A It's from the Google team. In brackets it says,
4 "Removals at Google.com."

5 Q And it's addressed to?

6 A It's addressed to my e-mail address,

7 [REDACTED]

8 Q And is [REDACTED] the e-mail address
9 that you use?

10 A Yes, it's my primary e-mail address.

11 Q And was it your e-mail address in 2012?

12 A Yes.

13 Q And do you use it for business and for
14 personnel?

15 A Yeah. Mainly I guess personal, but both, yes.

16 Q Okay. Mostly person- --

17 A Mostly personal, yes.

18 Q And does this document include kind of your
19 earlier message to Google?

20 A Yes, it includes --

21 Q Or your earlier --

22 A It includes my -- some of my earlier message. I
23 guess -- the original message follows, and then it says I
24 had e-mailed them, "Subject: Your Request to Google,
25 Date," so it's sort of coded, but it does contain my

CX0450-036

1 original message, yes.

2 Q So it looks like there's a lot of different
3 fields in the e-mail that looks like -- could this have
4 been the form that you filled out to submit the request
5 to them and these are the entries?

6 A I think so. This is the form I was speaking of
7 earlier I believe, yeah. Yeah, I think this is their,
8 you know, just computer code recognizing my responses to
9 their form process, it looks like.

10 Q Uh-huh. And so what was your kind of original
11 request to Google, or your form that you submitted to
12 Google? What was your main complaint?

13 A I think I was asking that it be removed because
14 it was defamatory statements, and I was trying to follow
15 that take-down notice procedure that I had read about in
16 the Google forums.

17 Q Lower on the page, I think there's a section
18 under the legalother_explain category, it says, "This
19 page contains defamatory statements about me. This page
20 contains malicious false statements about me. The page
21 says Quote: This guy is insane, pure and simple. This
22 is a false defamatory statement under U.S. law."

23 A Uh-huh.

24 Q Do you remember writing that to Google?

25 A I do, yes, I remember writing that.

CX0450-037

1 Q Lower on that same entry, it says, "The page
2 also says '██████████ is a Jerk.' This is also a
3 defamatory statement."

4 A Uh-huh.

5 Q When you wrote this, did you think that, you
6 know, someone thought you were a Jerk from the --

7 A Yes. I guess I would have to answer yes. I
8 mainly just felt like someone was using the forum to
9 harass me, they had a legal agenda against me or
10 something.

11 Q And then, as you said, Google's response is on
12 top and it looks like they wrote on March 7th, "We have
13 received your legal request."

14 A Uh-huh.

15 Q And that due to -- well, "We receive many such
16 complaints each day" and "your message is in our queue
17 and we'll get to it as quickly as our workload permits."

18 A Uh-huh, I see, okay. Right.

19 Q And you didn't get any additional responses to
20 that after --

21 A I don't know.

22 Q Okay. Now I'm going to hand to you what I've
23 marked as CX0448-001.

24 (FTC Exhibit CX 448 marked.)

25 BY MS. FANG:

CX0450-038

1 Q Do you recognize this document?

2 A Yes.

3 Q What is it?

4 A It's a e-mail to John Fanning from me that I --
5 this is what I spoke about earlier. It was me advising
6 him that I would file a defamation site against Jerk.com,
7 please remove my name -- and a request to remove my name
8 from the site. And as I mentioned earlier, I had read
9 that that may work in getting you removed from the site.

10 Q And so this is an e-mail -- what's the date on
11 the e-mail?

12 A March 7th.

13 Q And this is from your ██████████
14 address?

15 A Yes.

16 Q To ██████████?

17 A Correct.

18 Q Okay. And so then this is an e-mail from you to
19 John Fanning?

20 A Yes, that's correct.

21 Q Or to that e-mail address. And is the
22 ██████████ address the address you found on the
23 Google forum that you mentioned earlier?

24 A Yes.

25 Q And did you get -- were you planning to file a

CX0450-039

1 defamation suit against Jerk.com?

2 A Honestly, I was thinking that I wouldn't need to
3 and that I would try this -- somebody said by making that
4 statement, it would get you removed. So I wasn't
5 planning on doing that.

6 Q So you really wanted him -- whoever received
7 this to remove the profile though?

8 A Yeah. Although, I mean, if possible I would
9 have, yeah. I'm not sure if I remember if they said that
10 I could do that easily or not, but -- I don't know. I
11 mean -- I think mainly -- I really don't recall, but I
12 think mainly I was just following the script that I had
13 read on the Google forum that would get me removed from
14 the thing. Say, "please remove my name from the site,"
15 so --

16 Q Okay.

17 A Yeah, uh-huh.

18 Q Okay. And -- so when you wrote, you just
19 wanted -- you saw that you could write to this e-mail
20 address and request removal and you just wanted to try
21 it --

22 A Uh-huh.

23 Q -- to see if it could get your information
24 removed?

25 A Yes.

CX0450-040

41

1 Q And did you receive a response to this e-mail?
 2 A No.
 3 Q And from kind of your time looking at the Google
 4 forum, did it seem like other people were having the same
 5 problem that you -- or concern that you had with --
 6 A Yes, it seemed like there were a large number of
 7 people that were having similar problems.
 8 Q Okay. And, you know, did it seem like a lot of
 9 people were also trying to find ways to contact --
 10 A Yes, absolutely.
 11 Q -- Jerk -- and can you -- you know, do you have
 12 a sense of how many people might have also been in your
 13 same situation?
 14 A Oh, thousands.
 15 Q Thousands?
 16 A Yeah.
 17 Q Okay.
 18 A Easily, yeah.
 19 Q Okay. And so this is from looking at the forums
 20 and all the different posts?
 21 A That was the impression I got, yeah. Tens of
 22 thousands I would imagine.
 23 Q Okay. And now, Mr. [REDACTED] I'm going to show
 24 you a document that we have marked as CX0449.001.
 25 Oh, before I move to this one, for the last one,

CX0450-041

42

1 the CX-448, I just want to make sure, that's the document
 2 that you brought in this morning?
 3 A Yes, it is.
 4 Q Okay. Now I'm going to show you CX0449.001?
 5 (FTC Exhibit CX 449 marked.)
 6 THE WITNESS: Okay.
 7 BY MS. FANG:
 8 Q Do you recognize this document?
 9 A Yes, I do.
 10 Q What is the document?
 11 A It's a response from the Google team,
 12 Googleremovals@Google.com, to me at my e-mail,
 13 [REDACTED] and I guess it says, "Google.com
 14 is a US site regulated by US law. Google provides access
 15 to publicly available webpages, but does not control the
 16 content of any of the billions of pages currently in the
 17 index. Given this fact, pursuant to Section 230(c) of
 18 the Communications Decency Act, Google does not remove
 19 any allegedly defamatory material from our search
 20 results. You will need to work directly with the
 21 webmaster of the page in question to have this
 22 information removed or changed. If you haven't yet
 23 worked with the webmaster, please visit Google,"
 24 et cetera, et cetera. "Once the material has been
 25 modified on the site in question, Google's search results

CX0450-042

43

1 will automatically reflect this change after we next
 2 crawl the site. We are sorry we cannot assist you
 3 further at this time. Regards, The Google Team."
 4 Q And what is the date of the e-mail?
 5 A May 13th, 2012.
 6 Q Okay. So in May 2012, were you still trying to
 7 contact Google to get the profile removed?
 8 A Apparently so, yes.
 9 Q And does that e-mail contain your original
 10 request to Google?
 11 A No, this is a separate request to Google that I
 12 made -- it appears this is a separate request that I made
 13 on May 13th. I believe my original -- according to these
 14 documents, was on March 8th. So it appears that, you
 15 know, a couple months later I was yet trying again to
 16 have it removed from Google and they were telling me no,
 17 that they couldn't. So -- yeah.
 18 Q So a few months after -- this is your second
 19 request to Google, in May 2012 --
 20 A Correct.
 21 Q -- where you were trying to --
 22 A Yes.
 23 Q And if you'll look -- so we see that same kind
 24 of list of form entries and kind of categories. Under
 25 legalother_explain, what does that say there?

CX0450-043

44

1 A Legalother_explain -- oh. "Contains defamatory
 2 content at that is illegal in California.
 3 Legalother_quote: contains photo and content." It says,
 4 "This guy is insane pure and simple and this guy did a
 5 bunch of drugs."
 6 And then I wrote "Cyberbully has started a Gmail
 7 account in my name as well." And I guess this is the
 8 list of the Gmail account, [REDACTED] -- or no, it
 9 isn't, sorry. I wrote that, I see. It looks like more
 10 code down below. Sorry, my mistake, yeah.
 11 Q Right. Down below, it looks like it's a code to
 12 the http --
 13 A Yeah.
 14 Q -- the www.jerk.com [REDACTED] --
 15 A Yes.
 16 Q So was that a link to your profile that was on
 17 Jerk.com?
 18 A Yes, it appears to be a link to my profile at
 19 Jerk.com.
 20 Q Okay. And so, you know, when -- do you remember
 21 writing kind of the complaint there?
 22 A I do, yes.
 23 Q Okay. And do you remember what you meant when
 24 you wrote, "Cyberbully has started a gmail account in my
 25 name as well"?

CX0450-044

1 A Yes, because I had noticed that -- actually,
 2 what I believe had happened was initially when I looked
 3 at the site, it didn't have this gmail account on --
 4 listed under my information. It had only my name,
 5 residence and my age.
 6 Q Okay.
 7 A Later someone had gone through and added more
 8 negative comments about me and added this e-mail address.
 9 Q Okay.
 10 A And so between -- apparently between March 7th,
 11 2012 and May 13th of 2012, someone had added -- I noticed
 12 on the site someone had added an e-mail address and I
 13 became concerned about that. And so I wrote in that not
 14 only have they made these comments on Jerk.com, but they
 15 started an e-mail address in my name, so -- and what
 16 happened with that was I tried e-mailing the address to
 17 see what would happen, and I don't -- I think it didn't
 18 go through. And then I went into gmail and I got into
 19 Start Account and I started the account in that name to
 20 see if it had been used.
 21 Q Right.
 22 A Because I was concerned that these people had
 23 started an e-mail in my name and were using it and maybe
 24 they were using it for other purposes. So -- but I was
 25 able to start that e-mail account in my name, so it was

CX0450-045

1 Q Okay. Did you try to get the Jerk.com profile
 2 of you removed in -- did you try another way?
 3 A Yeah, I believe -- then the, you know, last
 4 thing I tried was -- or I'm not sure what sequence it
 5 was, but at two, possibly three, instances I tried to get
 6 removed by joining the site and paying money.
 7 Q Okay. Can you tell me a little -- so you paid
 8 money to join the --
 9 A Yes.
 10 Q -- website?
 11 A I resisted doing that because I felt they were
 12 real unethical and that I didn't want to encourage what
 13 they were doing, I felt it was unethical. So for quite
 14 some time I did not join the site and I tried these other
 15 methods, and none of 'em worked. And at some point I
 16 just felt like even though it was unethical to support
 17 them, it was more damaging to me to have that information
 18 on the Internet.
 19 And I do believe also at that time I noticed a
 20 drop in my business. And I can't say whether it had
 21 anything to do with the Jerk.com website or not, but I
 22 perceived that it was a possibility. So I decided, you
 23 know, I just gotta go ahead and give them the \$30. As
 24 unethical as they are, I'm going to do it and keep my
 25 business and they can have my \$30, you know.

CX0450-047

1 not a real e-mail until I started it during my
 2 investigation. I intentionally started it to see if it
 3 was an e-mail that had been used by someone else, but it
 4 hadn't been used.
 5 Q So when you first saw it, the e-mail wasn't
 6 there, but you think someone else added the comment --
 7 A Yes.
 8 Q -- and added the e-mail address?
 9 A Yes. There were more -- over time there were
 10 more comments added to the site. More defamatory
 11 comments after my friend's mother had written the
 12 positive comments about me, they rebutted to those
 13 comments and wrote more negative comments about me, and
 14 also posted this e-mail address. And I saw the negative
 15 comments, and then I also saw the e-mail address, and I
 16 became concerned if they were maybe using like, you know
 17 identity, theft and started an e-mail in my name perhaps.
 18 So that's why I tried to get that e-mail address, and I
 19 was able to do that.
 20 Q And the amount of time you spent in creating
 21 that gmail, that's also included --
 22 A Again, that's more time, yeah.
 23 Q And this CX 449, that's also a document that you
 24 brought in today?
 25 A Yes, it is, uh-huh.

CX0450-046

1 And so I tried that, and it didn't work. I
 2 remember, you know, entering my credit card on the site
 3 and, you know, pressing enter and it -- if I remember
 4 correctly, the screen like did a little shift like it had
 5 accepted my credit card number, but then it just flipped
 6 to like the same thing it was before basically, and --
 7 and I had no access anywhere to being a member or editing
 8 anything. But yet the site had given me the impression
 9 that as soon as I had clicked "Pay," I was going to get
 10 some sort of access to membership and I would have some
 11 sort of way of editing my profile. And I was not -- I
 12 didn't get any access like that.
 13 Q So when you paid the \$30, you thought that once
 14 you put in the credit card number and you clicked Okay,
 15 or entered, you'd be able to edit --
 16 A Yeah, I believed that that would -- I was pretty
 17 certain that I had a really great chance of being able to
 18 edit my profile because I had read on the Google forum
 19 that a lot of people were able to do that.
 20 Q Okay. And you said you didn't get anything once
 21 you put in --
 22 A No, nothing.
 23 Q Do you remember kind of -- did you think that,
 24 you know, if you hadn't signed up, you wouldn't have been
 25 able to kind of remove your profile, or alter it?

CX0450-048

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1 A Can you repeat that question?
 2 Q Sure. So you decide -- you know, you didn't
 3 want to sign up, but you said you finally decided to sign
 4 up because you thought it may have been affecting your
 5 business and that --
 6 A Yes.
 7 Q And did you think that if you hadn't signed up,
 8 do you think you could have -- I guess what I'm trying to
 9 ask is, without signing up, did you think you could
 10 remove the profile or ask for it to be edited or have
 11 access to the Jerk.com profile of you?
 12 A Without signing up?
 13 Q Right, did you think it was your only way to --
 14 A I felt it was absolutely my only way. I had
 15 tried everything else on the site to try and change the
 16 negative information about me and there was no way to do
 17 it, you know. And so I felt like that was really my
 18 only -- my only avenue to change, alter the negative
 19 comments that were made about me.
 20 Q When you signed up, did you think there was
 21 anything else that you would be getting in return, or
 22 that you would be able to do on the website once you
 23 signed up? Or maybe you could restate again kind of what
 24 you thought you could do once you paid.
 25 A I think I thought that I would be able to edit

CX0450-049

50

1 my profile and that I would be, you know, considered a
 2 member of the site, and there may have been other things
 3 indicated that would be available for membership, but I
 4 can't recall what they are.
 5 Q Do you remember kind of reading anything on the
 6 Jerk.com website about what you would get if you signed
 7 up for the \$30 membership?
 8 A That's a good question.
 9 Q Feel free to take --
 10 A Yeah. What would I get? I believe there was
 11 some vague indication that I would have access to my
 12 information and editing it, but I don't even know exactly
 13 what that was. That's all I can remember, uh-huh.
 14 Q Would it help if I showed you some screenshots
 15 of the website --
 16 A Yeah.
 17 Q -- if you remember reading those?
 18 A Sure.
 19 Q Okay. Mr. ██████ I'm going to show you what
 20 we've previously marked as CX272-001. Take a minute to
 21 look at it.
 22 This is a screenshot of a part of the Jerk -- do
 23 you remember -- does this look familiar to you? Or does
 24 this look like, you know, what you saw on Jerk.com?
 25 A You know, I'm not sure that this is what I saw.

CX0450-050

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1 Something similar, but I'm not sure this is exactly what
 2 I saw.
 3 Q Does this look like, you know, what the Jerk.com
 4 website looked like when you --
 5 A Yeah, it does.
 6 Q Okay.
 7 A It definitely does. I remember the heading Post
 8 a Jerk, Remove, School, Cities, I remember that, and the
 9 language sounds like it too, you know, Looking for the
 10 latest scoop on a world filled with jerks. It definitely
 11 looks like the Jerk.com site to me, yes.
 12 Whether or not this is the exact page that I saw
 13 when I signed up, I'm not sure. But it was definitely
 14 very similar to this, yes. I do remember that.
 15 Q Okay. And I think -- I do you remember visiting
 16 any of the -- on the top there are different links, as
 17 you said, to Post a Jerk or Remove --
 18 A Yeah, as I stated earlier, I visited all -- I
 19 thoroughly examined the website looked at all of them,
 20 uh-huh.
 21 Q So would you have sort of clicked on --
 22 A Clicked on all the links, absolutely, uh-huh.
 23 Q Are there any other kinds of phrases or things
 24 on this page that you remember reading?
 25 A Well, you know, I remember this at the bottom,

CX0450-051

52

1 Having problems with signing in? Get help. Because I
 2 remember after I paid them I couldn't sign in and I
 3 remember clicking on that.
 4 Q Okay.
 5 A In the bottom right corner, I remember that. I
 6 do remember that.
 7 Q So after you paid, did you ever receive a
 8 password?
 9 A No.
 10 Q And did you receive any type of user name or any
 11 other information --
 12 A No.
 13 Q -- for accessing --
 14 A No. I never received anything from them, no.
 15 Q And do you remember if were you able to click on
 16 more parts of the website or get to places in the website
 17 that you weren't able to access before you paid?
 18 A No, I couldn't get to anything different and I
 19 just -- I remember trying everything, you know.
 20 Q So you said you remember trying the -- having
 21 problems with signing in. Do you remember reading
 22 anything else on that page, or are there other phrases on
 23 that page that's familiar?
 24 A You know, I don't remember, but I definitely do
 25 remember this and clicking on it. I don't know what

CX0450-052

53

1 happened when I clicked on it, I'm not certain, but --
 2 yeah.

3 Q After you paid, did you -- do you know whether,
 4 you know -- did you verify that you had been charged the
 5 \$30?

6 A Yeah, I did, uh-huh. Yeah, I looked and I could
 7 see that it came out of my bank account on that card,
 8 uh-huh.

9 Q And do you remember how many times you were
 10 charged? Or whether you were just charged once?

11 A I believe I was charged twice. That I tri- -- I
 12 attempted to sign up two times and I believe I was
 13 charged for those two, and I don't recall for certain but
 14 I believe I may have gone back later and tried a third
 15 time.

16 Q Okay.

17 A But I'm not sure, uh-huh.

18 Q And after each of those times, you didn't get
 19 any password?

20 A Yeah, never did I receive a password or any
 21 other information.

22 Q And we're still looking at CX 272. Do you
 23 remember reading any of the other statements on this?

24 A Not really. Let's see. I can't -- I don't
 25 know, the word sainthood does sounds familiar. I may

CX0450-053

55

1 Q And do you remember reading anything else on
 2 the -- and this is the "Remove" -- the header here under
 3 Jerk is "Remove"?

4 A Yes. "Premium support is available for people
 5 who require a higher level of service than is provided
 6 for free." Uh-huh.

7 Q Do you remember reading that sentence?

8 A I remember reading something very similar, if
 9 not that sentence, yes, uh-huh.

10 Q Okay. And the final sentence on the page, "If
 11 you however use Jerk to manage your reputation and
 12 resolve disputes with people who are in conflict with.
 13 There are also additional paid premium features that are
 14 available," and gives the Jerk.com sign-in. Do you
 15 remember reading that?

16 A Yeah I do, yes.

17 Q And do you remember -- what did you think you
 18 would get, you know, as part of the premium support?

19 A I thought that I might be able to go in and
 20 remove the negative comments about me on the site.

21 Q And do you remember if you tried to click on
 22 that Jerk.com contact link?

23 A Yes, I did.

24 Q And do you remember what you saw or --

25 A Yeah, nothing -- nothing happened. Or wait.

CX0450-055

54

1 have read that statement. It says, "Sign now and grow to
 2 Sainthood while avoiding millions of jerks along the
 3 way," and I remember thinking that was real kind of
 4 ironic, you know, because I felt like they were really
 5 lacking a lot of integrity and yet they were using the
 6 word sainthood to join, and I felt like it was really
 7 ironic.

8 Q Now I am going to show you what has previously
 9 been marked CX 275-001. Does this screenshot of the
 10 Jerk.com website, does that look familiar to you?

11 A Yeah, I think so. Let me look at it.

12 Q Sure, take your time.

13 A Yeah, I remember this sentence, "Just because
 14 you have a profile on Jerk does not mean you are a Jerk."
 15 That seems very familiar. Yeah. Yeah, and then they
 16 say, "or is a Saint in the eyes of others." Yeah, I
 17 think I remember this for sure, uh-huh.

18 Q Yeah. So you think you read -- you remember
 19 reading "Jerk is where you" -- "Just because you have a
 20 profile on Jerk does not mean you are a Jerk"?

21 A Uh-huh.

22 Q And "Jerk is where you find out if someone is a
 23 Jerk, is not a Jerk or is a Saint in the eyes of others"?

24 A Uh-huh, yeah. Yeah. I remember that, uh-huh.
 25 Yes.

CX0450-054

56

1 Q There's two links there. One's the Jerk.com
 2 contact and one's the Jerk.com sign-in.

3 A Oh, okay.

4 Q Do you remember clicking on either of those?

5 A Yeah, I think when I clicked on these, that's
 6 when I was able to add my credit card information and
 7 sign up.

8 Q Okay. But you didn't actually -- did you reach
 9 anyone? You didn't actually reach anyone?

10 A No. I guess I -- you know, I don't remember
 11 exactly everything, but I believe that I clicked on these
 12 links and, you know, nothing -- I wasn't able -- was able
 13 to maybe -- this is where I could enter my credit card
 14 information and sign up, but then after I did that,
 15 nothing happened that was different.

16 Q Kind of on the top of that, near the top right
 17 of that same page, on CX 275, there's a little kind of
 18 tweet pledge that says, "Get our news, Everywhere!" and
 19 it says, Tweetfollow@Jerk_com_news."

20 Do you remember seeing the tweet message there?

21 A No.

22 Q Do you remember if you saw any Twitter message
 23 from them or visited a Twitter page?

24 A I can't remember.

25 Q Okay. Do you remember, did you visit the Remove

CX0450-056

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1 page before you signed up? It sounds like --

2 A Yes.

3 Q -- before you signed up and you paid the \$30?

4 A Yes.

5 Q And then now I am going to show you what's been

6 previously marked as CX 276-001.

7 A Yeah.

8 Q This is another screenshot of the Jerk.com

9 website. Does this screenshot look like the website when

10 you saw it?

11 A I think so, yeah.

12 Q This is a Jerk screenshot and it says on the

13 top, "Become A Subscriber" and it says, "Billing

14 Information, You must be a subscriber member in order to

15 create a dispute!" And then it says, "if your billing

16 information does not match billing address for credit

17 card, there will be delays in order processing," and then

18 it has various fields where you can put in your name and

19 contact information and credit card.

20 Does this look like the form that you had --

21 A Yes.

22 Q -- submitted to put in your credit card?

23 A Yes.

24 Q And do you remember reading any of the

25 statements on this page?

CX0450-057

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1 be the exact thing I saw. I'm noticing here -- you know,

2 2013-02-05, so it's possible that, you know, it was a

3 similar -- the website was changed between the time that

4 I signed up.

5 Q Okay.

6 A However, this looks very similar to what I

7 signed up on, if not the same. And I remember

8 clicking -- entering all my information correctly,

9 doubling checking it, like I do, and clicking Submit and

10 having the screen just shake like it had been accepted

11 almost, and then hitting it again and having nothing

12 happen.

13 And then where my recollection isn't really very

14 clear, I feel like I may have at that same setting redid

15 it again, and put all my information in again and hit

16 Submit again a second time. But I'm not positive. And I

17 would like to look at my bank statements and check

18 exactly what happened about those two charges. It may

19 have been two charges the same day, or I may have gone

20 back a couple days later. But I'm almost positive I

21 tried to sign up twice, if not three times.

22 Q Okay. So when you first visited Jerk, was it

23 principally a black background website?

24 A Uh-huh, yes.

25 Q And did it have red buttons?

CX0450-059

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1 A The Gold Membership sounds vaguely familiar.

2 But I'm not sure if I remember for certain, but it does

3 sound familiar.

4 Q What did you sign up for? You know, there's a

5 button for Gold Membership under -- and then there's a

6 button for Standard Membership. Which one did you sign

7 up for?

8 A I think initially the standard membership.

9 Q But you said before you tried to --

10 A Yeah, I really don't know, you know.

11 Q Okay.

12 A But I believe it was the standard for \$30 a

13 year.

14 Q Is that because \$30 is what you remember paying

15 or being charged on --

16 A Yes, that sounds like a familiar number, uh-huh,

17 yes.

18 Q So you submitted this form in order to become a

19 member, and you said nothing happened once you put in

20 your credit card information?

21 A Uh-huh.

22 Q Is there anything else you remember about the

23 sign-up process for the membership?

24 A I just remember hitting like Submit or whatever

25 it was -- this main -- you know, honestly, this may not

CX0450-058

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1 A Yeah, there was a lot of red and green and blue,

2 uh-huh.

3 Q Okay.

4 A And I think maybe -- maybe yellow too.

5 Q Okay.

6 A I can't remember. But it was -- definitely

7 these colors like on this -- these printouts. There was

8 red buttons, black background, same logo, just like this.

9 Q The same Jerk logo --

10 A Yeah, same format, exactly.

11 Q Okay, same format with headers on the top --

12 near the top of the web page that you can click on?

13 A Yeah, I remember the Schools and Cities, Remove,

14 Post a Jerk, I remember those headings, yeah.

15 Q Okay, great. I'm going to pause here for

16 another quick break.

17 (Recess.)

18 BY MS. FANG:

19 Q We're back on the record.

20 A Okay, great.

21 Q Okay, thank you.

22 So earlier you said that you saw somewhere on

23 Jerk.com where it said that people could not remove

24 profiles, or the public -- it was based on public

25 searching, right?

CX0450-060

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1 A Yes.

2 Q And -- but it sounds like when you had bought
3 the \$30 membership, based on your understanding, you
4 thought that you could, you know, alter or at least kind
5 of meaningfully edit the Jerk.com profile of you; is that
6 correct?

7 A Yes, that's correct.

8 Q And would it be accurate to say that then buying
9 the \$30 Jerk membership got you absolutely nothing?

10 A Yes, that's correct.

11 Q And do you remember when you were on the Google
12 forum, do you remember other people having the same issue
13 where they paid for a membership on got nothing?

14 A No.

15 Q Okay. And do you remember what the Google forum
16 name was that you checked out?

17 A No.

18 Q Was it a few different forums all on Google, or
19 was it one forum?

20 A I believe it could have been a few, but I'm not
21 sure.

22 Q Okay. And also earlier, you know, you had
23 suspicions of who might have posted you on the website.
24 Did you ever find out who posted you?

25 A No.

CX0450-061

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1 Q And would you have wanted to find out who had
2 posted the --

3 A Yes.

4 Q And you also tried a bunch of different ways of
5 contacting Jerk, including e-mailing John Fanning at the
6 John Fanning e-mail address. Did you find any other way
7 of contacting Jerk besides, you know, the e-mail to --
8 the John Fanning e-mail address on the Jerk website?

9 A I don't believe I did.

10 Q Okay. So were you able to find any other e-mail
11 or physical addresses associated with Jerk?

12 A I think there was some physical addresses listed
13 in one of the Google forums, the same one -- thread that
14 I got the John Fanning e-mail from, I believe somewhere
15 in one of the Google threads they listed even his
16 personal address I believe.

17 Q Okay.

18 A Like his home address.

19 Q Okay.

20 A Not -- I don't know if it was his correct
21 address or not, but I do remember seeing some addresses,
22 yeah. But they were I believe down in Los Angeles, and
23 so I had no way of like physically going there, and I
24 felt like it was really not plausible to write them by
25 hand and didn't feel like I'd get a response or anything,

CX0450-062

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1 so I didn't do anything with those addresses I don't
2 think, so -- yeah.

3 Q Okay. So you thought it would be more likely to
4 get a response from e-mailing?

5 A Yeah, it was pretty much all I felt was worth my
6 effort, yeah.

7 Q Before the break we were also looking at a few
8 of the documents. I wanted to show you -- well, I guess
9 before we do that I actually want to go back.

10 You also said that you saw a lot of other
11 profiles on the Jerk.com website?

12 A Yes.

13 Q Did you browse through the website to look at
14 other profiles?

15 A Yes.

16 Q And what do you remember in those -- seeing on
17 those profiles?

18 A I remember seeing that some of 'em had photos of
19 the person and some didn't. Like myself, I didn't have a
20 photo. I remember seeing some of them had derogatory
21 comments like myself, and some didn't. Some were, you
22 know, filled out extensively and had photos and lots of
23 comments, and some had little to no information on them.

24 Q And did they generally look like your profile in
25 terms of the website, the layout --

CX0450-063

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1 A Yes.

2 Q -- and the types of information?

3 A Yes.

4 Q Did you visit the Jerk Of The Day -- are you --

5 A Jerk Of The Day?

6 Q Does that sound familiar?

7 A Yeah, I saw Jerk Of The Day and I looked at it
8 on more than one occasion, yes.

9 Q And when you looked at it on the different
10 occasions, were they different profiles that were posted
11 each time you looked?

12 A Yes. And I believe there was a button or a
13 section where you could pay extra money and have someone
14 nominated for Jerk Of The Day, if I'm not mistaken.

15 Q Okay, you remember seeing that?

16 A Uh-huh.

17 Q Do you remember any other sections of the
18 website?

19 A Yeah, there were a lot of sections. I think
20 there was -- like in this here. Here, there was Post a
21 Jerk, Remove A Jerk, that the statement that you couldn't
22 be removed. Then there was Schools, Cities. I can't
23 remember exactly what those were, but yeah, there were --
24 I remember there were a lot of different -- it's pretty
25 extensive -- a fairly extensive website.

CX0450-064

1 Q And I know we looked earlier at CX272-001, and
2 that is still in front of you there. Do you remember
3 reading this statement on that page, "Want to join
4 millions of people who already use Jerk for important
5 updates for business, dating and more?" Does --

6 A It sounds familiar.

7 Q Okay. And now I'd like to show you what has
8 previously been marked CX0273. Do you remember seeing a
9 page on Jerk that looked identical, or similar to this
10 document?

11 A Yeah, I think there was something like this,
12 uh-huh. But I'm not sure. Yeah, I'm not positive.

13 Q You're not, okay. Could you describe what's in
14 that document? What it looks like?

15 A It's like the terms and conditions of
16 membership. Must be 14 years old, Online Conduct, agree
17 that you're responsible for conduct, indemnity, you will
18 defend, indemnify, hold harmless Jerk LLC, its officers,
19 online content, opinions, prior statements, removal.

20 Yeah, just -- it looks like terms of use and
21 legal limitation of liability state by state. Like an
22 attempt to sort of cover themselves legally in the use of
23 the site.

24 I don't specifically remember these pages, but
25 it's possible I did see 'em.

CX0450-065

1 Q Earlier you mentioned that you read some rules
2 on the -- you know, when you were looking through Jerk
3 and you clicked on different -- you mentioned you clicked
4 on different rules of the site. Is this what you
5 remember seeing? Is that you went by the rules of the
6 website?

7 A No, I think I was referring to the -- or when I
8 clicked on Remove, there was a section that said you
9 couldn't be taken off Jerk.com.

10 Q Okay.

11 A It indicated you might be able to alter your --
12 you know, whether or not were you a jerk on Jerk.com by
13 membership or by, you know, public opinion, but that once
14 you were on Jerk.com, you needed to stay on Jerk.com.
15 You weren't -- they weren't going to take you off. I
16 remember that.

17 As far as the rules, I think that's what I was
18 referring to.

19 Q That's what -- okay.

20 A Yeah.

21 Q On that -- on CX-273, No. -- Item 4, it says --
22 you know, "Online Content, opinions, advice, statements
23 offers or other information or content made available
24 through Jerk.com are those of their respective authors
25 and not of Jerk LLC, and should not necessarily be relied

CX0450-066

1 upon. Such authors are solely responsible for the
2 accuracy of such content."

3 Does that statement sound familiar?

4 A No, I mean this page could have definitely been
5 there, but I don't remember that, no.

6 Q Okay. And then in Item No. 12, this is the
7 Copyright Policy and Contact Information for DMCA
8 Notices." It says -- you know, the last sentence, "If
9 you believe that your copyright has been infringed
10 through use of Jerk.com, please contact our customer
11 service."

12 Do you remember reading that statement, or does
13 that sound familiar?

14 A Yeah, I may have. It sounds familiar. I don't
15 remember this statement exactly, but I may have read
16 something like that, yeah.

17 Q Okay. Now I'm going to give you another
18 document that's been previously marked CX 274-001. Do
19 you remember seeing this page on Jerk?

20 A I believe so, uh-huh.

21 Q And what is this page?

22 A Post a Jerk. And it has a section you can enter
23 someone -- enter them on the site.

24 Q Okay. When you visited the site, did you think
25 that you could add -- post someone to the website?

CX0450-067

1 A Yes.

2 Q And did you try to post anyone? Or post --

3 A Yeah, honestly, I think I went -- I looked to
4 see if the woman that I thought was responsible for the
5 defamatory comments against me, I searched her name and I
6 found her name on the site, and I was really tempted to
7 post some defamatory content against her, but I felt like
8 that would be really unwise and I refrained from doing
9 it.

10 Q So did you think, you know, this feature was how
11 people got profiled on Jerk.com?

12 A Yeah, I thought that this was one of the ways.
13 I thought that also you could end up on Jerk.com because
14 they had accessed your information from Google, because I
15 read that in my research.

16 Q Oh.

17 A And I think I remember looking at people's --
18 just random people -- you know, Joe Smith or something
19 and seeing, you know, that they had an actual picture.
20 Because a lot of the profiles didn't have pictures, and
21 so I went to Facebook and I clicked on that person, and
22 yes, indeed, that person would have a public profile with
23 the same picture. And so I could see that, yes, indeed,
24 you know, Jerk.com was mining Facebook to get
25 information, and I sort of verified what I had read

CX0450-068

1 myself by doing that.

2 Q Okay. So it sounds like one of the ways people
3 could get on was through this Post a Jerk --

4 A That's right.

5 Q -- feature. And so also read somewhere from the
6 Google forum that --

7 A Yeah.

8 Q -- I didn't fully follow that -- people could
9 also get on if they were -- you could search for them on
10 Google?

11 A Yes. Somehow -- I believe that somehow Jerk.com
12 had accessed Facebook's information, or at least the
13 public accounts or something, and somehow were able to
14 copy that information and put it into website form for
15 themselves and use that information.

16 I didn't initially believe that. When I first
17 accessed the site and saw it, I didn't know that. I just
18 thought that maybe people had filled out this form and
19 posted me on there, and it was like, Wow, it's really
20 amazing. And then later as I researched, I found out
21 that maybe it was from Google. And I have a Facebook
22 account and it was private, so there was no photo
23 showing, so I figured yeah, that must be where they got
24 it.

25 Q Okay. So after later research, you learned

CX0450-069

1 dated 2013, and I don't remember this part about the
2 people under 14, and I remember language saying that
3 if -- that you couldn't be removed.

4 Q Okay.

5 A You know, that they were doing -- like I said,
6 it was kind of like that it was their ethical standpoint,
7 that they just wanted to do the public a service by
8 posting this site for people, almost like they were a
9 societal watchdog or something. So --

10 Q Okay. So you might have seen --

11 A Different language.

12 Q -- different --

13 A Uh-huh. I believe it was, uh-huh.

14 Q Okay.

15 A Very -- a lot of it was similar. Like I said
16 before, I think this word sainthood was familiar, so --
17 I'm just guessing perhaps this is a later page and it may
18 have been edited from the ones I originally viewed a year
19 prior.

20 Q Okay.

21 A It was very similar.

22 MS. FANG: And we're going to go off the record
23 again.

24 (Recess.)

25 BY MS. FANG:

CX0450-071

1 another possibility would be through --

2 A Yeah, I figured either -- from my profile,
3 somebody either figured this out or, you know, they got
4 it from Facebook.

5 Q Okay. But when you first went to the website,
6 you just thought someone put you on the website?

7 A Yes, I did, uh-huh, yes.

8 Q Now, this exhibit you have in front of you,
9 CX-275 -- I think we actually talked about this earlier.
10 Is there anything else you remember reading on this page?

11 A Yeah, I remember reading that you couldn't be
12 removed. "Jerk is where you find out if someone is a
13 Jerk" -- oh. Oh, yeah, it -- this is a little
14 different -- somewhere I remember reading that -- they
15 said that -- basically, in so many words, they said that
16 they were doing a public service by having the site, and,
17 you know, they would be unethical if they let somebody
18 remove them or something, and just that you were going to
19 have to be on the site permanently.

20 I don't see that language here, but I do
21 remember reading that under -- I believe under the remove
22 section, so --

23 Q Okay.

24 A And I don't -- you know, actually -- you know, I
25 don't think this is the rule that I saw, because this is

CX0450-070

1 Q We're back on the record.

2 A All right.

3 Q So earlier, you know, we talked about different
4 ways that you tried to contact the Jerk website. Did you
5 try looking for Jerk.com's contact information on the
6 website?

7 A Yes, I believe so. Yes, absolutely, uh-huh.

8 Q Were you able to find any contact information?

9 A Well, yeah, I -- I don't think I was able to
10 contact them.

11 Q Do you remember if you found any e-mail address
12 for Jerk on the website?

13 A I can't remember.

14 Q Do you remember if you found any physical
15 address for Jerk on the website?

16 A I can't remember.

17 Q And do you remember finding or seeing any phone
18 number for Jerk on the Jerk website?

19 A I don't believe I found one because I would have
20 called it.

21 Q Okay. And do you think you would have e-mailed
22 Jerk --

23 A Yes.

24 Q -- if you had found an e-mail address?

25 A Yes, and I didn't see any e-mails to them when I

CX0450-072

1 searched Jerk in my e-mail folders. I don't erase any
2 e-mails, so I mean, I'm assuming that no, I was not able
3 to e-mail them at all, yeah.

4 Q Okay. And you said that -- did you -- you said
5 you also looked on the Google forum where you were able
6 to find that John Fanning e-mail. Did you look anywhere
7 else on the Internet or anywhere else for other contact
8 information?

9 A Yes.

10 Q And so you found -- on the Google forum you
11 found the e-mail address and you found the physical
12 address. Were you able to find any e-mail address for
13 Jerk, the company, either in the Google forum or anywhere
14 else you searched?

15 A I don't believe so.

16 Q Okay.

17 A Otherwise I would have written them an e-mail.

18 Q And did you find a phone number for Jerk
19 anywhere else?

20 A No.

21 Q And did you find any physical address for Jerk?

22 A No.

23 Q Okay. Now I'm going to show you what's been
24 previously marked as CX038.

25 A Yeah.

CX0450-073

1 Q Do you remember submitting a sworn and signed
2 declaration to the FTC, the Federal Trade Commission, in
3 October 2012?

4 A Yes.

5 Q And is this document that declaration you
6 submitted?

7 A Yes.

8 Q Please take a few minutes to read the document.

9 A Uh-huh. Yes, this is true.

10 Q You've finished reading?

11 A Yes.

12 Q Okay. So in Paragraph 2 in the declaration, you
13 said, "In February 2012 I was searching the Internet and
14 typed my name into the Google search engine."

15 A Uh-huh.

16 Q Earlier today you were uncertain about the exact
17 month when you found -- whether it was December 2011 or
18 February 2012 or March 2012.

19 A Yeah, right.

20 Q Would you say that --

21 A Well --

22 Q -- it was one of -- during -- around that time?

23 A Yes.

24 Q That during one of those months you found it?

25 A Yeah. This may be the most accurate guess. It

CX0450-074

1 was definitely between, you know, March, because I have
2 this -- March 7th, I have this e-mail where I was writing
3 to Google about them, and then I believe somewhere
4 around, you know, December, January or something, I had
5 that other issue with that person, so I -- I mean, yeah,
6 to me this is the most accurate time frame that I think
7 it would have been, you know.

8 Yeah, it's probably somewhere in February.

9 January, February, uh-huh.

10 Q Okay. And it was definitely before March -- it
11 was before March 2012 that you found --

12 A Yeah, it was, uh-huh.

13 Q Okay. And then in paragraph 5, I think it's on
14 the second page, on CX 0038-002, you said, "As of today
15 my profile is still visible on Jerk.com and I have not
16 received a password to activate my Jerk.com membership."

17 I think earlier today you mentioned that at some
18 point you could no longer -- your profile was no longer
19 on Jerk.com.

20 A Yes.

21 Q And so is it -- does this paragraph just need to
22 be updated that -- meaning that --

23 A Yeah, because on 2012, I guess I could still see
24 my profile, and now it's been taken down. Sometime
25 between, you know, October of 2012 and now it's been

CX0450-075

1 taken down.

2 Q Okay.

3 A I'm not sure. I think that happened -- you
4 know, I can't remember when that happened.

5 Q Okay. But -- right, in October of 2012 it was
6 still up?

7 A Uh-huh.

8 Q And so now, two years later, it's down.

9 A Uh-huh.

10 Q Apart from these two differences in Paragraph 2
11 and Paragraph 5, is the rest of the declaration true and
12 accurate?

13 A Yeah, I think I left out that -- the part, I
14 said I checked my bank statement and confirmed that
15 Jerk.com withdrew 30 from my account, and I think that
16 there's a really good possibility I left out that there
17 was more than one charge --

18 Q Okay.

19 A -- so I need to research that.

20 Q Okay. But it's accurate -- you at least checked
21 it once --

22 A Yeah, I --

23 Q -- and you know --

24 A Yeah, I know for sure I saw it on my account,
25 yes. Because I remember being just really upset that not

CX0450-076

1 only had I been told that I was going get something, but
2 I got -- and having this terrible information on there,
3 but that I got absolutely nothing, you know, and that was
4 just -- yeah, I know I got charged, and I was like I have
5 to see, did they charge me for that --

6 Q Right.

7 A -- and then I looked and they did, indeed, yes.

8 Q And then -- but apart from possibly be charged
9 twice, is the remainder of the declaration true and
10 accurate?

11 A Yes.

12 Q Great. I have no more questions for now. Thank
13 you very much for your time today, Mr. [REDACTED]

14 As you saw, all we've said here today has been
15 typed, and so the court reporter will send all of us a
16 copy of your testimony and you have the opportunity to
17 read and review and sign the deposition transcript within
18 30 days.

19 A Okay.

20 Q And so if for -- you know, you can also waive
21 the opportunity to sign it and review right now. There's
22 no charge for you to actually -- you know, get the
23 transcript. It will be sent to you and you can review
24 and sign it.

25 A Oh, okay.

CX0450-077

1 MR. YANKILOVICH: So just to add to what Yan has
2 said, our understanding is that they will send the
3 transcript to your physical address. However, if you
4 want to provide an e-mail address, and we can do that off
5 the record, a copy will be e-mailed to you within I think
6 four business days, which is our customary turnaround.

7 THE WITNESS: Sure.

8 MR. YANKILOVICH: And like Yan said, there's no
9 cost, and I believe, but I'm not exactly sure sitting
10 here, that there's a 30 day period where if you find any
11 errors, you can submit a correction sheet. And then in
12 the end you either have to return a signature page
13 stating, yes, this all looks good and correct, or you've
14 gotta affirmatively refuse to sign, so that -- because we
15 have to tell the Court whether the person signed or
16 somehow didn't want to sign.

17 And as Yan mentioned last week, you know, if you
18 have absolutely no desire to review the transcript,
19 you're welcome to waive the review and signature. But
20 it's completely your choice. You're more than welcome to
21 review it and make sure all of your testimony has been
22 correct.

23 So that -- just for your information, I wanted
24 to kind of clarify the process, because this is sort of
25 technical minutia that is not common sense stuff.

CX0450-078

1 A Yeah. I understand. I have one question and
2 that is, I still have the possibility of locating, you
3 know, my bank statements with the charges from Jerk.com
4 and possibly some screenshots. So would it be wise to
5 try and look for those in the next week or something and
6 then provide those to you if I find them, and should I
7 wait before I sign my statement to do that or --

8 MR. YANKILOVICH: Well, let's -- that we can
9 talk about off the record, because that doesn't directly
10 bear on the content of the deposition. But it's your --

11 THE WITNESS: Yeah.

12 MR. YANKILOVICH: I don't -- I can't foresee how
13 finding additional documents would have any bearing. Of
14 course, if you find documents that for some reason
15 contradict or reveal errors in some of your testimony, it
16 may be wise to, you know, say you'll wait and submit
17 corrections. So it sounds like maybe the smarter course
18 is to review the transcript.

19 But we can talk about the documents and the
20 protocol off the records.

21 THE WITNESS: Okay, yeah.

22 MS. FANG: Thank you very much for your time. I
23 think that those are all my questions.

24 (Whereupon, at 1:27 p.m., the hearing was
25 concluded.)

CX0450-079

1 CERTIFICATION OF REPORTER
2 DOCKET/FILE NUMBER: 9361
3 CASE TITLE: FTC vs. JERK, LLC; JOHN FANNING
4 DATE: 11/03/14
5

6 I HEREBY CERTIFY that the transcript contained
7 herein is a full and accurate transcript of the notes
8 taken by me at the hearing on the above cause before the
9 FEDERAL TRADE COMMISSION to the best of my knowledge and
10 belief.

11

DATED: 11/5/2014

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THERESA A. NARDELLO
CALIFORNIA CSR 9966

CX0450-080

WITNESS: 

DATE: 11/3/14

CASE: JERK LLC, ET AL DOCKET # 9361

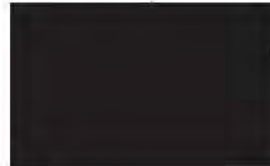
Please note any errors and the corrections thereof on this errata sheet. The rules require a reason for any change or correction. It may be general, such as "To correct stenographic error," or "To clarify the record," or "To conform with the facts."

PAGE	LINE	CORRECTION	REASON FOR CHANGE
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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.



11/25/14

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CX0450-081

CX0450-082

CX0481

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CX0494

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0507

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

CX0529

MARKED CONFIDENTIAL



3200 N. CENTRAL AVENUE, 20TH FLOOR, PHOENIX, AZ 85012

jaburgwilk.com

Maria Crimi Speth

mcs@jaburgwilk.com
 602.248.1089 - Direct Phone
 602.248.0522 - Main Fax

January 17, 2013

George Jepsen
 Attorney General of Connecticut
 MacKenzie Hall
 110 Sherman Street
 Hartford, CT 06105-2294

Gary J. Jaburg
 Lawrence E. Wilk
 Roger L. Cohen
 Mitchell Reichman
 Beth S. Cohn
 Kraig J. Marton
 Scott J. Richardson
 Ronald M. Horwitz
 Kathi M. Sandweiss
 Mervyn T. Braude
 Lauren L. Garner
 Maria Crimi Speth
 Michelle C. Lombino
 Neal H. Bookspan
 Janessa E. Koenig
 Mark D. Bogard
 David N. Farren
 Valerie L. Marciano
 David L. Allen
 Laurence B. Hirsch
 Susan E. Wells
 Bridget O'Brien Swartz
 Jennifer R. Erickson
 Renee Gerstman
 Nathan D. Meyer
 Kelly Brown
 Adam S. Kunz
 Laura A. Rogal
 Amy M. Horwitz
 Nichole H. Wilk
 Gregory T. Harris
 Jeffrey A. Silence

Re: [REDACTED]

Dear Mr. Jepsen:

This is in response to your letter of December 27, 2012 which was received in my office on January 18, 2013 after being routed from the statutory agent of Jerk.com. You have requested that my client respond to a complaint filed by [REDACTED]

Initially, I note that Jerk, LLC is a Delaware company and has no contacts with the state of Connecticut that would subject it to jurisdiction there.

Substantively, the complaint alleges that the photograph in a post on my client's website is copyright protected and that Jerk.com violated the Digital Millennium Copyright Act. Jerk.com is in compliance with the DMCA. I am its designated agent for notice and the website promptly removes material that is the subject of a valid DMCA notice. If I had received a valid DMCA notice from [REDACTED], the allegedly infringing content will be promptly removed. The statement in the complaint that Jerk.com does not reveal contact information is false. The designated DMCA contact information is listed with the Copyright Office, which is what is required by statute.

The complaint also states that the post damages [REDACTED] reputation. Pursuant to the First Amendment of the United States Constitution, the post is protected free speech. Moreover, Jerk, LLC operates the forum, but the content is provided by users. The Communications Decency Act, 47 U.S.C. § 230(c)(1) (the "CDA"), which was passed by Congress with the intent to "promote unfettered speech" on the Internet, immunizes websites from liability for user generated content. The CDA preempts any inconsistent state law; "[n]o cause of action may be brought and no liability may be imposed under any State or local law that is inconsistent with this section."

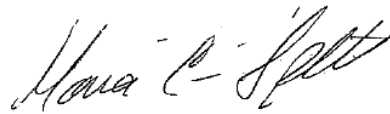
JABURG|WILK
Attorneys at Law

George Jepsen
January 16, 2013
Page 2

Finally, the complaint states that the photograph was taken when [REDACTED] was 14 years old. Based on this representation, the website has removed the profile. If [REDACTED] parent had written directly to the website, the profile would have been removed based on her age.

Sincerely,

JABURG & WILK, P.C.



Maria Crimi Speth

CX0530

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:maria.crimi.speth@jaburgwilk.com)
Subject: FW: Removal of posting of [REDACTED] on jerk.com
Date: Friday, January 18, 2013 11:05:13 AM
Attachments: [Letter to Speth Jan. 2.2013.doc](#)

Dear Ms. Crimi Speth,

Kindly advise as to the status of the removal as per the DMCA request of January 2, 2013.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: [REDACTED]
Date: Wed, Jan 2, 2013 at 2:19 PM
Subject: RE: Removal of posting of [REDACTED] on jerk.com
To: Maria Crimi Speth <mcs@jaburgwilk.com>
Cc: [REDACTED]

Dear Ms. Speth,

Attached is a DMCA notice letter with respect to our previous request.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

-----Original Message-----

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: December 20, 2012 12:28 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Removal of posting of [REDACTED] on jerk.com

Mr. [REDACTED]:

Jerk.com is operated by a U.S. company and is governed by U.S. law. If your client has a valid copyright claim, you may submit a DMCA notice to me and it will be processed pursuant to U.S. law.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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From: [REDACTED]
Sent: Tuesday, December 18, 2012 11:28 AM
To: Maria Crimi Speth
Cc: [REDACTED]
Subject: Removal of posting of [REDACTED] on jerk.com

<<Ltr to M. Crimi Speth Esq. re removal of [REDACTED] on jerk.com Dec 17 12.pdf>>

Dear Ms. Crimi Speth,

Please find enclosed a letter from [REDACTED] dated December 18, 2012 requiring your immediate attention. Should you have any questions or concerns, please do not hesitate to contact her at her e-mail address given above.

[REDACTED]
Stieber Berlach LLP
Barristers & Solicitors
18th Floor, 130 Adelaide Street West
Toronto, Ontario
M5H 3P5
(416) 366-1400 ext. 2795

JERK 00171
CX0530-002

CX0531

MARKED CONFIDENTIAL



2000 N. CENTRAL AVENUE, 20TH FLOOR, PHOENIX, AZ 85012

jaburgwilk.com

Maria Crimi Speth

mcs@jaburgwilk.com
602.248.1089 - Direct Phone
602.248.0522 - Main Fax

February 7, 2013

Penelope Lerner
Internet Bureau
State of New York
Office of the Attorney General
120 Broadway
New York, NY 10271

Gary J. Jaburg
Lawrence E. Wilk
Roger L. Cohen
Mitchell Reichman
Beth S. Cohn
Kraig J. Marton
Scott J. Richardson
Ronald M. Horwitz
Kathi M. Sandweiss
Mervyn T. Braude
Lauren L. Garner
Maria Crimi Speth
Michelle C. Lombino
Neal H. Bookspan
Janessa E. Koenig
Mark D. Bogard
David N. Farren
Valerie L. Marciano
David L. Allen
Laurence B. Hirsch
Susan E. Wells
Bridget O'Brien Swartz
Jennifer R. Erickson
Renee Gerstman
Nathan D. Meyer
Kelly Brown
Adam S. Kunz
Laura A. Rogal
Amy M. Horwitz
Nichole H. Wilk
Gregory T. Harris
Jeffrey A. Silence

Re: *File number 2012-1045007*
[REDACTED]

Dear Ms. Lerner:

I am in receipt of your letter of January 14, 2013 directed to Jerk.com. First, I note that Jerk, LLC is a Delaware company and has no contacts with the state of New York that would subject it to jurisdiction there.

As far as substance, it seems that the "consumer" is unhappy because someone posted on my client's website asking whether he was a jerk. Pursuant to the First Amendment of the United States Constitution, that is protected free speech. Moreover, Jerk, LLC operates the forum, but the content is provided by users. The Communications Decency Act, 47 U.S.C. § 230(c)(1) (the "CDA"), which was passed by Congress with the intent to "promote unfettered speech" on the Internet, immunizes websites from liability for user generated content. The CDA preempts any inconsistent state law; "[n]o cause of action may be brought and no liability may be imposed under any State or local law that is inconsistent with this section."

Based upon the First Amendment and the CDA, the complaint appears to be entirely without merit.

Sincerely,

JABURG & WILK, P.C.

Maria Crimi Speth

CX0532

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Debra A. Gower](mailto:Debra.A.Gower)
Subject: Fwd: Copyright Infringement/Endangerment of Public Safety by your client
Date: Tuesday, August 20, 2013 7:32:39 PM

----- Forwarded message -----

From: [REDACTED]
Date: Tue, Aug 20, 2013 at 10:29 PM
Subject: RE: Copyright Infringement/Endangerment of Public Safety by your client
To: mcs@jaburgwilk.com

Dear Ms. Maria Crimi Speth,

I am writing in regards to one of your clients, Jerk.com/Jerk.org, who is currently the subject of an investigation by the Federal Trade Commission. Jerk.com generated a profile of me using a copyrighted photograph whose use I had not consented to. Following multiple notices of copyright infringement under the *Digital Millennium Copyright Act*, the photograph was removed. However, my profile has not been removed.

I would like to request that my profile ([http://www.jerk.org/profile.php?name=\[REDACTED\]&id=20721497](http://www.jerk.org/profile.php?name=[REDACTED]&id=20721497)) under Jerk.org be removed. Jerk.org/com is premised on a violation of people's copyright, and it endangers public safety by posting private address information online. It also facilitates anonymous online slander.

I have already reported Jerk.com to the FBI, and have contacted several of the site's prior webhosts. **If my profile is not removed, I will also be contacting the internal security division at my employer - Public Prosecution Service of Canada - and the Royal Canadian Mounted Police, in light of the fact that Jerk.org is endangering my safety by making it possible for anyone dealing with the criminal justice system to go online and post sensitive information about me and other justice system participants.**

I hope you will communicate the above to your client, and look forward to your cooperation in this matter.

--

[REDACTED]
J.D. Candidate 2014
Osgoode Hall Law School
Toronto, ON
[REDACTED]

JERK 00200
CX0532-001

CX0533

MARKED CONFIDENTIAL

From: [REDACTED]
To: support@jerk.com
Cc: info@jerk.com; Maria Crimi Speth
Subject: USER [REDACTED] -p75111919 REMOVAL - TERMS OF SERVICE VIOLATION
Date: Thursday, November 01, 2012 12:12:27 PM

Hi

My Name is on the site jerk.com. I would request to remove the link [www.jerk.com/\[REDACTED\]p75111919.html](http://www.jerk.com/[REDACTED]p75111919.html) and un-index it on google using robots.txt

This is having a very bad effect on my reputation as my Marriage proposal is almost being finalized and this had created a lot of discomfort to me and my family.

I am marking a copy of the mail to Ms Maria Crimi Speth who I understand is the attorney for jerk.com

This Online Harassment & Cyberbullying has violated my privacy so I request you to take immediate action in removing the link and send me a confirmation of the same.

Hoping for positive and speedy action from you

Thanks in advance

[REDACTED]

CX0534

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Debra A. Gower](#)
Subject: Fwd: DMCA Complaint
Date: Monday, November 12, 2012 9:35:40 AM
Attachments: [DMCA Complaint - Jerk.com - \[REDACTED\].01 - signed.pdf](#)

FYI

----- Forwarded message -----

From: [REDACTED]
Date: 12 November 2012 16:38
Subject: Re: DMCA Complaint
To: Maria Crimi Speth <mcs@jaburgwilk.com>
Cc: [REDACTED] Attorney.General@state.de.us, [REDACTED]

Dear Maria,

This is not a question of your clients policy and your response of "this DMCA is not valid" is not accepted

As the legal council of Jerk.com you have the legal responsibility to seek clarification of any required information OR expeditiously remove or disable access to the allegedly infringing material, unless you can provide proof that your client is the copyright holder of the copyrighted photos and that your client also has permission to publish personal information such as address information, especially as the image contains of a minor.

The DMCA clearly states that the copyright holder's written notification of claimed infringement to the OSP's [Jerk.com] designated agent [Jaburg & Wilk, P.C.] including the following information is deemed to be a valid DMCA notification.

(i) A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

The DMCA infringement notification clearly contains this information.

(ii) Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works at that site.

The DMCA infringement notification clearly contains this information

(iii) Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit the service provider to locate the material.

The DMCA infringement notification clearly contains this information.

JERK 00216
CX0534-001

(iv) Information reasonably sufficient to permit the service provider to contact the complaining party, such as an address, telephone number, and, if available, an electronic mail address at which the complaining party may be contacted.

The DMCA infringement notification clearly contains this information.

(v) A statement that the complaining party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

The DMCA infringement notification clearly states this information.

(vi) A statement that the information in the notification is accurate, and under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.


The DMCA infringement notification clearly contains this information.

In accordance with the Digital Millennium Copyright Act, you must remove this copyrighted information or request further information. You have done neither. Your client has clearly infringed copyright laws, and you are obliged to act on this matter.

I must also reiterate that there is a minor involved in this notice, and as such, your clients own terms prohibit the upload of pictures and information relating to minors, therefore you must move to remove this photo immediately at the very least.


I look forward to your quick resolution of this matter.

Kind regards,


Director

consulting | creue

tel: +44 20 7193 5520 | mobile: +44 7875 1888 52 <tel:%2B44%207875%201888%2052> | skype: ben.creue

mail:  | www.creue.com <<http://creue.com/>>

View my linked in profile: [linkedin.com/in/](https://www.linkedin.com/in/creue)

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Please consider the environment before printing this e-mail. Thank you.

On 12 November 2012 15:27, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

Mr. [REDACTED]:

I cannot give you legal advice. You should research the DMCA.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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From: [REDACTED]
Sent: Monday, November 12, 2012 8:25 AM
To: Maria Crimi Speth
Subject: Re: DMCA Complaint

Dear Maria,

May I ask why this DMCA is Not valid and what other information do you require?

I have provided all the information that was mentioned as required on the jerk.com website, have

JERK 00218
CX0534-003

I not?

Please inform me exactly what you need me to provide to remove that page and stop jerk.com from publishing copyrighted and abusive information.

This website has stopped [REDACTED] from getting a job due to this abuse. Hopefully you have a heart, and compassion, and will expedite the removal of this page.

I look forward to hearing from you.

[REDACTED]

On 12 Nov 2012, at 15:18, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

Mr. [REDACTED]:

The attached is not a valid DMCA notice.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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JERK 00219
CX0534-004

<tel:%28602%29%20248-1000> , or via e-mail, and delete this message and all attachments thereto.

From: [REDACTED]
Sent: Monday, November 12, 2012 7:50 AM
To: support@jerk.com; abuse@jerk.com <<mailto:abuse@jerk.com>> ; Maria Crimi Speth; [REDACTED]; abuse@hostkey.ru; abuse@scopehosts.com <<mailto:abuse@scopehosts.com>>
Cc: [REDACTED]
Attorney.General@state.de.us
Subject: DMCA Complaint

Dear Sirs,

Please find attached a DMCA Complaint relating to copyrighted and abusive content published on Jerk.com, without lawful consent.

I would also like to add in addition to the attached letter, that the referenced Jerk.com web page has had several untrue comments posted by anonymous users, which are significantly damaging the livelihood of my client. The referenced url's contain pictures and locational information of a protected minor who has been involved in a child abuse investigation. We suspect that the person posting these comments is one and the same person, as that charged with this horrendous crime.

We request that you retain the IP address information of the person that posted these hateful comments, as we are in the process of gaining a court order to submit to you for the release of the said IP addresses by Jerk.com, in cooperation with the United Kingdom authorities, so that further charges may be brought forward.

We require that you cease and desist recording and publishing the referenced information, including name and address information, and remove the entire profile with immediate effect, and prohibit anyone else registering a new profile under this name and address detail.

We would appreciate it greatly if you could please attend to this matter with the utmost urgency and respond in a timely manor to confirm that you have received and are dealing with this notice.

I hope that this website will be soon removed and not be allowed to operate, as it's sole purpose seems to be to solicit money to remove or report personal information, which has been stolen, without consent, from other websites, such as Facebook and Twitter.

Yours sincerely,

JERK 00220
CX0534-005

CX0535

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](#)
Subject: Please help with threats posted on Jerk.com
Date: Wednesday, November 21, 2012 2:11:56 PM

Dear Ms. Speth-

I was hoping that you could help me get a threat to me and my property removed from Jerk.com. I've reported this person's comments to my lawyer and the local police. They unfortunately are unable to assist me unless something is actually physically done, which scares me. I'm trying my best to find someone who can help with removal of the negative, threatening comments.

Here is the profile that is full of negative comments and threats:

[http://www.jerk.com/\[REDACTED\]-p23286204.html](http://www.jerk.com/[REDACTED]-p23286204.html)

Are you able to assist me or let me know who can?

Thank you so much for your time,
[REDACTED]

CX0536

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:Maria.Crimi.Speth)
Subject: USER [REDACTED] REMOVAL - TERMS OF SERVICE VIOLATION
Date: Saturday, November 24, 2012 3:12:15 AM

Good day,

I am writing this email to ask from your kind office to please REMOVE [REDACTED] in your website www.jerk.com <<http://www.jerk.com/>>

He is a victim of harassment and cyberbullying. He is a good man and a good husband to me. I know that there are people out there trying to destroy our marriage and that they tried to humiliate my husband through your website.

I've been having sleepless nights since the day I saw his profile in your website and I keep on crying on why there are people who never stop torturing me. My family and my husband's family are very affected. They want to know who is the person responsible for this post. I don't want to reach this issue in court and I hope you can help us regarding this matter.

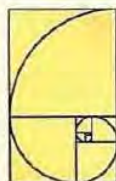
I am pleading from your kind heart to hear me.

Thank you.

JERK 00230
CX0536-001

CX0537

MARKED CONFIDENTIAL



GIOCONDA

LAW GROUP PLLC

One Penn Plaza • 36th Floor
Fashion Avenue & West 34th Street
New York, NY 10119-0002
Tel: (212) 786-7549

Bell Plaza • Suite 607
42-40 Bell Boulevard
Bayside, NY 11361-2201
Tel: (718) 423-3610

Fax: (888) 697-9665
E-Mail: Joseph.Gioconda@GiocondaLaw.com
Website: www.GiocondaLaw.com

Re: Jerk.com / [REDACTED]

30 November 2012

By E-Mail, w/Attachments
and Certified Mail, Return Receipt Requested, w/Attachments

Ms. Maria Crimi Speth, Esq.
JABURG & WILK, P.C.
3200 North Central Avenue
Suite 2000
Phoenix, AZ 85012

Ms. Speth:

I am writing to follow up on our telephone conversation of Wednesday, November 28, 2012. It is my understanding that you represent Jerk.com LLC, which you confirmed. As we discussed, my law firm represents [REDACTED]. Under penalty of perjury, I declare by my signature below that I am authorized to speak on [REDACTED] behalf in this matter.

Our client recently discovered that a search for his name in the Google® search engine returns a result that is highly visible in the top two listings which states: "Jerk :: [REDACTED] • is a jerk". See attached Exhibit 1.

When a user then clicks the hyperlink displayed in the Google® search results, he is brought to a profile page on Jerk.com. This profile prominently displayed several images, including the first, third and fourth images, which were images of [REDACTED]. See attached Exhibit 2. The second image displayed was not of [REDACTED].

JERK 00234

CX0537-001

Please be advised that the unauthorized copying and display of the fourth image violates [REDACTED] exclusive rights under the U.S. Copyright Act, 17 U.S.C. § 501 *et seq.*

[REDACTED] does not concede that Jerk.com LLC may avail itself of the safe harbor in Section 512(c) of the Digital Millennium Copyright Act ("DMCA") for several reasons.

First, Jerk.com is not merely an online or Internet "service provider" as defined by the DMCA. It clearly benefits directly and financially from the infringements occurring thereon. *Id.*; see *A&M Records, Inc. v. Napster, Inc.*, 239 F.3d 1004 (9th Cir. 2001) ("drawing" customers to a website to receive a direct financial benefit deprives OSP of safe harbor.)

Second, as discussed further below, it is not clear that the profile of [REDACTED] depicted in Exhibit 1 attached hereto was "user generated content."

However, solely for the purposes of expeditiously resolving this particular matter, please be advised that we possess a good faith belief that Jerk.com's display of the fourth image violates [REDACTED] exclusive rights in that image, and we demand that it be permanently removed.

Without waiving or relinquishing his rights in any way, solely to mitigate the damages caused by the ongoing existence of this profile, [REDACTED] opted to pay Jerk.com to designate this profile as "private" and to forward visitors to an innocuous website.

However, even utilizing this process does not remove the offending profile from continued visibility in search engine results, which continue to prominently display the statement "Jerk :: [REDACTED] • is a jerk" devoid of further context. Consequently, [REDACTED] continues to be harmed by Jerk.com's continued conduct in this regard.

Further, I had inquired during our telephone conversation of yesterday whether [REDACTED] profile and the images displayed constituted "user generated" content, or content unilaterally created by Jerk.com.

The reasons for our client's belief that this profile was *not* user generated are as follows.

First, there is no textual content. One would expect that user generated content would contain critical statements.

Second, the display of the various images in the profile mirrors those of images displayed in the Google[®] image search results, which include photographs that are not of [REDACTED]. See attached Exhibit 1. One would expect that any user generating such content would recognize [REDACTED], and filter such images out. Therefore, this fact strongly suggests that Jerk.com itself created this profile using images that were automatically harvested from Google[®] or other sources for the purpose of generating traffic and soliciting financial payments from targeted individuals.

You stated that you believed that all profiles on Jerk.com are user generated, because you believed that Jerk.com does not have the technical capacity to unilaterally create content. You also stated that you would ask your client about this fact, and confirm it. However, we have not yet received any response from you.

Please be advised that if Jerk.com is unilaterally creating content, it is clearly not provided with any form of immunity under the DMCA, and would be directly liable for, *inter alia*, copyright infringement, as well as for state law violations for misappropriation of likeness and invasion of privacy, as well as casting [REDACTED] in a false light.

Please inform us in writing by no later than **Thursday, December 6, 2012** whether [REDACTED] profile was a "user generated" profile.

This letter does not constitute a complete statement of the facts, law, claims, rights or remedies with respect to this matter, all of which are hereby reserved.

We look forward to your timely response.

Very Truly Yours,
The Gioconda Law Group PLLC



Joseph C. Gioconda
Attorney, Counselor at Law and Founder

cc: DMCA Complaints, Jerk LLC, w/Attachments
(by Certified Mail, Return Receipt Requested)

CX0538

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:maria.crimi.speth@jaburgwilk.com)
Subject: RE: Please take my pictures/name off of Jerk.com
Date: Saturday, December 08, 2012 3:57:59 PM

Why isn't there a function to protect people's privacy if they need it is my question then? This is so upsetting my health and safety are in jeopardy at this point in time.

Where, How and Who can I contact to address this issue? This is extremely important and I have tried every address, etc online to let them know this is serious matter and every letter has been returned unopened. I need a way to contact Jerk.com to get this resolved as quickly as possible. I should not have to "pay" them to have my private pictures removed. It should just be done if someone is in need.

As I mentioned before I've already had to cancel my facebook page where they got the original picture from in the first place because of my safety issues.

I would deeply appreciate any help with this matter.

Thank you,

--- On Fri, 12/7/12, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

From: Maria Crimi Speth <mcs@jaburgwilk.com>
Subject: RE: Please take my pictures/name off of Jerk.com
To: [REDACTED]
Date: Friday, December 7, 2012, 10:29 PM

My role is as legal counsel and I only address legal issues, not policy issues. Jerk.com has a paid support function for policy issues such as this.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com <<http://www.jaburgwilk.com/>>

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JERK 00251
CX0538-001

CX0539

MARKED CONFIDENTIAL

From: [REDACTED]
To: support@jerk.com; [Maria Crimi Speth](mailto:Maria.Crimi.Speth)
Cc: hostmaster@ripe.net; info@jerk.com
Subject: Terms of Service Violation - [REDACTED] FILE REMOVAL
Date: Thursday, December 13, 2012 9:45:17 AM
Attachments: [Proof of Ownership - photo 1.jpg](#)

To Whom It May Concern, and to Ms. Maria Crimi Speth:

My name is [REDACTED]. A website that your company hosts (according to WHOIS information) is infringing on at least one copyright owned by me.

An article was copied onto your servers without permission. The original photo, to which I own the exclusive copyrights, can be found at www.facebook.com <<http://www.facebook.com/>>. My facebook account is set to private; however, I have attached a screen shot of the original photo source as Proof of Ownership.

The unauthorized and infringing copy that was uploaded on your server can be found at:

[REDACTED]-p54215472.html> [http://www.jerk.com/\[REDACTED\]p54215472.html](http://www.jerk.com/[REDACTED]p54215472.html) <[http://www.jerk.com/\[REDACTED\]p54215472.html](http://www.jerk.com/[REDACTED]p54215472.html)>
<[http://www.jerk.com/\[REDACTED\]p54215472.html](http://www.jerk.com/[REDACTED]p54215472.html)> <[http://www.jerk.com/\[REDACTED\]p54215472.html](http://www.jerk.com/[REDACTED]p54215472.html)>

This letter is official notification under Section 512(c) <<http://www.copyright.gov/title17/92chap5.html#512>> of the Digital Millennium Copyright Act ("DMCA"), and I seek the removal of the aforementioned infringing material from your servers. I request that you immediately notify the infringer of this notice and inform them of their duty to remove the infringing material immediately, and notify them to cease any further posting of infringing material to your server in the future.

Please also be advised that law requires you, as a service provider, to remove or disable access to the infringing materials upon receiving this notice. Under US Law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If service providers do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright infringement action you will need to investigate and ultimately remove or otherwise disable the infringing material from your servers with all due speed should the direct infringer, your client, not comply immediately.

I am providing this notice in good faith. Under penalty of perjury, I swear that I am authorized to act on behalf of the owner of the copyrighted material described in this letter and that the identified copyrighted material that is allegedly being infringed. I have a good faith belief that use of the copyrighted material in the manner complained of is not authorized by the copyright owner, any agent of the copyright owner, or the copyright laws. I further swear under penalty of perjury that the information contained in this letter is true and accurate.

Should you wish to discuss this with me please contact me directly.

Thank you,

[REDACTED]
[REDACTED] Georgia, USA

CX0540

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [REDACTED]
Subject: RE: Jerk.com
Date: Tuesday, January 15, 2013 9:49:44 AM

I am legal counsel but I do not address policy issues. You may contact the website directly.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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From: [REDACTED]
Sent: Friday, January 11, 2013 2:15 PM
To: Maria Crimi Speth
Subject: Jerk.com

Dear Ms. Speth,

I was given your name as the legal representative for the owners of the website Jerk.com. I recently became aware that somehow my name and image had found its way to this site, with no way to remove it. I don't know how this happened but I can tell you that my photo is not authorized for use. The news of this site using my name and image has cause me a great deal of stress, embarrassment and concern that it may effect my ability to obtain employment in the future. I find this website harassing, defaming and bullying to unsuspecting individuals.

With that, I want both my image and name removed from this website within 48 hours of your receipt of this email. In addition to all record that may cause my name or image to come up in association with jerk.com, in any internet search. Before contacting my attorney, I hope to work through you to resolve this matter. I look forward to prompt response and completion of the request as listed above.

Thank you for your time.

Regards,
[REDACTED]

JERK 00355
CX0540-001

CX0541

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](#)
Subject: Re: REMOVE
Date: Wednesday, March 06, 2013 2:29:44 PM

Maria,
thank you for continuing the correspondence.
There is a one time fee of \$90 plus a "maintenance" fee.
All I want is my information taken down. I don't know who would be so cruel to add it (perhaps an angry ex boyfriend) but having my name connected to this site has caused serious professional consequences.
I am not wealthy nor can afford to spend money to hire an attorney to fight the owners of the site.
I like everyone else who has been added to this site just want the bullying to stop and have our names taken down.

What recourse do I have outside of pleading my case to you?

[REDACTED]

On Wed, Mar 6, 2013 at 4:15 PM, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

It is not my understanding that it is a monthly fee, I thought it was a one time.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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-----Original Message-----

From: [REDACTED]

Sent: Friday, March 01, 2013 9:18 PM
To: Maria Crimi Speth
Subject: Re: REMOVE

It's a monthly service fee!!
Outrageous. I shouldn't have to pay to not be cyber bullied.

I sent this message from my iPhone, please forgive any typos or errors.

On Mar 1, 2013, at 10:01 PM, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

JERK 00400
CX0541-001

> My understanding is that support is around \$30, not \$90. Did you try that?

>

> Maria Crimi Speth, Esq.

> Jaburg & Wilk, P.C.

> 3200 N. Central Ave., Suite 2000

> Phoenix, AZ 85012

>

> 602-248-1089

> 602-248-0522 (fax)

>

> www.jaburgwilk.com

>

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<tel:%28602%29%20248-1000> , or via e-mail, and delete this message and all attachments thereto.

> -----Original Message-----

> From: [REDACTED]

> Sent: Monday, February 25, 2013 1:13 PM

> To: Maria Crimi Speth

> Subject: Re: REMOVE

>

> Maria,

> I have tried that and it has not worked!

> I don't believe I should have to pay \$90 to have my name removed from this cyber bullying

site!!

> Do you have another ideas on how to fight this battle?

>

> Best,

>

>

> [REDACTED]

>

> "Love cures all except poverty and a toothache."~Mae West "The lion doesn't lose sleep over the opinion of the sheep."

> "When you know better, you do better."~Maya Angelou

>

> This message was sent from my iPad, please forgive any typos or misspellings.

>

> On Feb 25, 2013, at 2:06 PM, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

>

>> [REDACTED]

>>

>> I am only legal counsel and I do not have the ability to remove profiles, nor do I address policy issues. The website has an online support system to which you may direct your request.

>>

>> Maria Crimi Speth, Esq.

>> Jaburg & Wilk, P.C.

>> 3200 N. Central Ave., Suite 2000

>> Phoenix, AZ 85012

>>

>> 602-248-1089

>> 602-248-0522 (fax)

>>

>> www.jaburgwilk.com

>>

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>>

>> -----Original Message-----

>> From: [REDACTED]

>> Sent: Monday, February 25, 2013 8:02 AM

>> To: Maria Crimi Speth

>> Subject: REMOVE

>>

>> Maria,

>> It has come to my attention that my name has been submitted to your client's website Jerk.com and I'd like the profile removed.

>> The site is crass, indecent and has the capability of ruining lives and causing great embarrassment.

>> I am in fact not a jerk, I volunteer on a hospice unit, sit on the board of several charities and am well liked by my peers and colleagues.

>> I'm not sure who nominated me for this site but it has had repercussions in my life that are directly related to this site.

>> I would kindly ask that you remove any and all information associated with me, my name, photos, links, posts etc.

>> If you cannot do this, I'd appreciate it if you could direct me to the right person who can.

>>

>> Thank you,

>> [REDACTED]

>> Chicago, IL

>>

>> I sent this message from my iPhone, please forgive any typos or errors.

CX0542

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](#)
Subject: Inquirey
Date: Friday, March 22, 2013 12:28:15 AM

To whom it may concern.

I have realised that someone has put my name on "jerk.com" this webpage does not allow you to remove your profile and i have been in touch with people here in Australia about it. Unfortunately it's an American site and nothing can be done about it here. I have read some articles online and it mentions to get in contact with Maria Crimi Speth. I'm sure many have put in complaints. Is there anything being done about it and what are the chances of getting the profile or even the site removed? I didn't give permission for anyone to put my name, picture or any other details online - there must be a law for this type of behaviour and if so, this site is definitely in breach of that law?

I know your firm would be very busy. However, i would greatly appreciate any information given on this matter.

Kind Regards,
[REDACTED]

JERK 00407
CX0542-001

CX0543

MARKED CONFIDENTIAL

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Date: March 30, 2013, 11:39:25 PM MST
To: "mcs@jaburgwilk.com" <mcs@jaburgwilk.com>
Subject: Please Remove My Underage Son's Profile

Hello,

I would like to write to you about my son's profile on "Jerk.com." It has recently been called to my attention, and as my son is being bullied in school it causes him great distress that one of his bullies seemed to have created a page on your website. I am appalled to learn that your website promotes bullying; especially when there is already a major issue with bullying in schools across America as I am sure you are aware. My son is also under the age of 14, and I read that Jerk.com should remove a page in this case. I am very worried about my son, and would very much appreciate if you remove his page and ban his name from ever appearing on your website again. As a parent I am worried about my son developing PTSD later on in life, or another severe psychiatric illness as a result of bullying. It's difficult enough that he gets bullied in school, so he shouldn't have to deal with it at home as well. I am especially worried due to the articles I read about which often state that bullying can lead to suicide; even in very young victims despite the help they can get. Please have some sympathy and remove his page, as well as ban his name from ever showing up on your website again. Thank you.

Here is the link to the page:
[http://www.jerk.com/\[REDACTED\]-p62744079.html](http://www.jerk.com/[REDACTED]-p62744079.html)

Sincerely,

[REDACTED]

CX0544

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](#)
Subject: Jerk.com
Date: Monday, April 22, 2013 1:32:00 PM

Good Afternoon,

I read online that I can ask you to please get me removed from jerk.com. I have no idea how I could end up on such a website. I am trying to find a job closer to home, as I currently commute an hour back and forth to work and the jerk.com site has come up in two interviews. I am a Mother to one Son and soon to be Step-mother to five girls. The jerk.com site is becoming an issue in my relationship and never mind the fact I find it extremely embarrassing. Please, please, please get me off of there! Please!

Thank you,

[REDACTED]

Sent from my super terrific iPhone

JERK 00419
CX0544-001

CX0545

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](#)
Subject: [REDACTED]
Date: Tuesday, April 23, 2013 2:17:32 PM

Dear Maria,

I am writing hoping you will aid the removal of my name: [REDACTED] from jerk.com.

I have been receiving malicious posts from the man who has harmed my young daughter and is threatening me for nearly a year after I reported the abuse.

Please help me stop him intimidating me.

I really hope you can help. It was recommended that if anyone could help it would be you.

Many thanks,

[REDACTED]

Sent from Samsung Mobile

CX0550

MARKED CONFIDENTIAL

Record # 162 / Consumer Sentinel Network Complaints	
Reference Number: 34306692	Originator Reference Number: 1112270757422841
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "Record Details page - Data Reference field" on the Consumer Sentinel Network page for further details on IC3 data. -- Incident description: Taken pictures from Facebook, with out permission, even though i have placed security settings on Facebook to NOT share any information. The site has a lot of racist, homophobic, and hate content that i dont not wish to be associated with. If i try to remove my picture and profile from the site, it is asking me to pay a fee. Many people have complained about this site, and it may cause a problem for when i try to apply for a new job.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 12/27/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Unsolicited Email
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 12/27/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: BOCA RATON	State: Florida
Zip: 33433	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Www.jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0551

MARKED CONFIDENTIAL

Record # 35 / Consumer Sentinel Network Complaints	
Reference Number: 39802724	Originator Reference Number: 02510009168043
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I looked up my name on Google and I found my name, and profile pictures (since my profiles are private) from my Facebook and my old Myspace account on their website Jerk.com. There is also a picture that is not me that was put up there with mine under my name. I did not consent to them taking my name and my pictures and posting them on a website where people can say if I am a jerk or not and even write things about me. I went to the link 'Remove my name' and it brought me to a page that said: 'Just because you have a profile on Jerk does not mean you are a jerk . Less than 5% of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk , is not a jerk , or is a saint in the eyes of others. No one's profile is ever removed because Jerk is based on searching free open internetsearching databases and it's not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php and then it asked for my credit card information. I can't even contact these people without giving out my credit card information, which I will not do. So many people are being victimized by this website and some do not even know about it. The information they took is Personal Identifiable Information that they cannot take from me. — Additional Comments: I would like the website to be shut down, and if that cannot happen, I really wish I could have the option to take my name off because I did not put it there. I do not want this website to ruin my future career goals.'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 8/14/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 8/14/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: AMERICAN CANYON	State: California
Zip: 94503	Country: UNITED STATES
Home Number: [REDACTED]	Work Number: [REDACTED]
Fax Number:	Ext:

Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name: John Fanning	Title:

CX0552

MARKED CONFIDENTIAL

Record # 248 / Consumer Sentinel Network Complaints	
Reference Number: 34427580	Originator Reference Number: 02510008875542
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com displays my name and an old photo I used on my Facebook account with privacy settings. I deleted the account a long time ago.I never provided my name or photo to Jerk.com, and have not consented to their use of either. This is a violation of my privacy and an invitation to cyber bullying.What's worse, there is no way to contact the company. An attempt to do so leads you to a site soliciting money.What the company does is outrageous and I would think not legal. --- Additional Comments: Remove my name and photo immediately.'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 1/10/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 1/10/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: NEWTON	State: Massachusetts
Zip: 02459	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Lic	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States

Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0553

MARKED CONFIDENTIAL

Record # 135 / Consumer Sentinel Network Complaints	
Reference Number: 36838417	Originator Reference Number: 11760098683848
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: The website solicited information and an edited picture of mine through Facebook and an old Google Plus account without my permission.. — Additional Comments: I want them to remove my profile completely from their website. No traces, anything.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 4/11/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 4/11/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: TEMPE	State: Arizona
Zip: 85282	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0554

MARKED CONFIDENTIAL

Record # 69 / Consumer Sentinel Network Complaints	
Reference Number: 38925494	Originator Reference Number: 02510009115401
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com has me listed on there as [REDACTED] and there is no way to remove my profile. I have no idea how in the world it got there or who opened it. I tried to click 'remove me' but I have to pay a fee. I did not open this profile and I don't know who did or where they received my information. --- Additional Comments: I need this profile removed.'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 7/7/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 7/7/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: ROCKWALL	State: Texas
Zip: 75032	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com

Area Code:	Phone Number:
Ext:	
Representative Name: John Fanning	Title:

CX0555

MARKED CONFIDENTIAL

Record # 131 / Consumer Sentinel Network Complaints	
Reference Number: 36929809	Originator Reference Number: 11760098684891
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: They have a profile for me with my picture from one of my facebook profile pictures. It was taken without my permission. -- Additional Comments: Remove my picture and profile.	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 4/16/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 4/16/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: EWING	State: New Jersey
Zip: 08628	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com
Area Code: 781	Phone Number: 9253373

Ext:	
Representative Name:	Title:

CX0556

MARKED CONFIDENTIAL

Record # 231 / Consumer Sentinel Network Complaints	
Reference Number: 30811229	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: Please see this internet link: http://www.google.com/support/forum/Web+Searchthread?tid=6304 -en This malicious website: www.jerk.com took my image and name from Facebook and now I fear I am the victim of cyberbullying. It requests that in order to remove any damaging or offensive comments you have to subscribe to the website, paying a fee. This is blackmail. Please see my profile here: http://www.jerk.com/profile.php? While currently no offensive things are written about me, I think it is appalling that this website automatically phishes for profile details on other websites then blackmails you into paying a subscription fee to improve your information. As far as I am aware, the company is registered in Eakly, Oklahoma, with a web domain created in Romania. There is another website to which this company is linked: ASSIST Software SRL http://www.assist-software.ro/jerk I should also point out that Facebook has a duty of care to its clients with regard to how it shares information to other companies. As far as I am aware, it does not offer photographs to other companies. Indeed the photograph used on the www.jerk.com website was taken by me and is my copyright, and so my copyright has been infringed. PLEASE, PLEASE help with removing this website, and my profile on it - and preventing any further instances of blackmail. thank you.	
Data	
Reference:	Entry Date: 5/30/2011
Entered By: FTCCIS-FTCUSER	Updated Date:
Updated By:	Product Service Code: Internet Information & Adult Services
Complaint Source: FTC Online Complaint Assistant (CIS)	Amount Paid:
Amount Requested:	Agency Contact: Internet
Payment Method: Unknown	Transaction Date:
Complaint Date: 5/30/2011	Initial Response: Unknown
Initial Contact: Unknown	Law Violation: Company does not provide any opportunity for consumer to opt out of information sharing
Statute/Rule: General Privacy	Dispute with Credit Bureau?:
Topic:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Dispute with Credit Bureau - Resolved?:	Member of armed forces or dependent?:
Consumer Information	
Consumer	
Complaining Company/Org:	Last Name:
First Name:	Address 2:
Address 1:	State: England
City: London	Country: UNITED KINGDOM
Zip: SE26 6RU	Work Number:
Home Number:	Ext:
Fax Number:	Age Range:
Email:	Soldier Status:
Military Service Branch:	
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address:	
City: Eakley	State/Prov: Oklahoma
ZIP: 73033	Country: United States

Email: [REDACTED]	URL: www.jerk.com
Area Code: [REDACTED]	Phone Number: [REDACTED]
Ext:	
Representative Name: John Fanning	Title: CEO John Fanning.Com

CX0557

MARKED CONFIDENTIAL

Record # 308 / Consumer Sentinel Network Complaints	
Reference Number: 33041831	Originator Reference Number: 11110061348496222
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. --- Incident description: DEAR SIRs, I AM TRYING TO FIGURE OUT HOW TO ERASE MYSELF FROM A SITE I NEVER REGISTERED OR SELECTED TO BE PART OF, AS THEY TOOK MY NAME/LASTNAME AND PICTURE FROM FACEBOOK (AS MILLIONS OF OTHERS) . IT WAS AUTOMATED AS WHEN I SAW MY PROFILE IT HAD NO VOTES (POSITIVE OR NEGATIVE, I MEAN JERK OR NO) . THE SITE IS CALLED JERK.COM . WHEN I ASKED THEIR WEBMASTER TO DELETE MY PROFILE I SAW THIS PARAGRAPH BELOW (AND I RECEIVED MY 1ST ' JERK ' VOTE FROM HIM, I SUPPOSE) . IN ADDITION, THEY HAVE A SECTION WHICH IS CALLED 'REMOVE ME' AND THEY ASK FOR MONEY (NOT SURE IF IS ON A MONTHLY BASIS) AND I AM NOT REALLY SURE IF THE PERSON WHO PAYS CAN BE REMOVED AS THIS IS WHAT THEY WRITE, SO DEFINIETELY THIS IS A HUGE SCAM, AS IT INCLUDES MILLIONS OF PEOPLE (FRUSTRATED TO SEE THEMSELVES AS JERKS ON LINE, THEY PAY AND ARE STILL ONLINE AS 'JERKS OR NO!') : THIS IS ON THEIR REMOVE ME SECTION, IN WHICH THEY EXPLAIN WHY THEY WILL NOT REMOVE THEIR VICTIMS PROFILES! "Just because you have a profile on Jerk does not mean you are a jerk . Less than 5% of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk , is not a jerk , or is a saint in the eyes of others. No one's profile is ever removed because Jerk is based on searching free open internet searching databases and it's not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php " THIS IS MY PROFILE (PERSONAL PHOTOGRAPH AND NAME) WHICH IS PUBLISHED WITHOUT ANY APPROVAL FROM MY PART AND THIS IS AGAINST THE LAW AS THEY TOOK PERSONAL DETAILS WITHOUT ANY APPROVAL FROM MY PART (YOU CAN SEE IS TOTALLY EMPTY FROM INFORMATION AND IDENTICAL WITH MY FACEBOOK PROFILE) . http://www.jerk.com/profile.php?id= [REDACTED] I ALREADY CONTACTED SAFELINE.GR AND ELECTRONIC CRIME INVESTIGATION AUTHORITIES IN MY COUNTRY. THE REAL DANGER, BESIDES THE 'FUNNY' JERK PART, IS THAT ANYONE CAN POST ANYTHING ABOUT ANYONE WHO IS ON THE SITE (FROM PERSONAL INFORMATION TO BANK DETAILS -I SAW IT THAT'S WHY I AM MENTIONING IT) AND THEY ASK FOR MONEY, ALSO. I SAW PROFILES OF CHILDREN WHERE ANYONE CAN BASH THEM, AS ANYONE CAN POST ANYTHING FOR ANYONE. AT A PERSONAL LEVEL, I AM A PROFESSIONAL WRITER AND SCRIPTWRITER AND THIS CAUSES SERIOUS DAMAGE TO MY REPUTATION AND PROFESSIONAL IMAGE, THE FACT TO BE PART OF A SITE WITH THE NAME ' JERK '. ALSO THIS SITE INCLUDES 'HATE AND RACISM' ISSUES/ARTICLES, IN WHICH I DO NOT WISH TO BE PART OF AS MY PROFILE (IMAGE AND NAME WERE STOLEN FROM MY LIMITED PROFILE IN FACEBOOK) . IN ADDITION, I BELIEVE THIS IS A SORT OF BLACKMAIL SCAM, AS PEOPLE WHO WISH TO BE ERASED, PAY AN AMOUNT (NOT SURE IF THIS IS FORCED TO BE ON A MONTHLY BASIS, YOU HAVE TO LOOK INTO IT) AND STILL THEIR PROFILE IS THERE. IF YOU SEARCH/WRITE 'Problem with Jerk.com ' IN GOOGLE YOU WILL SEE IN DETAIL MANY ADDITIONAL INFORMATION ABOUT THIS ISSUE FROM OTHER VICTIMS (THE NAMES THEY FOUND TO THE MONEY ISSUE I MENTIONED EARLIER) . HOW CAN I BE PROTECTED AS GLOBAL CITIZEN FROM SUCH ILLEGAL ACTIONS? THESE PEOPLE ARE MAKING MONEY FROM ANXIOUS PEOPLE WHO WISH TO BE ERASED FROM A SITE THEY NEVER SELECTED TO BE PART OF... LOOKING FORWARD HEARING FROM YOU. KIND REGARDS, ALEXANDRA BELEGRA TI HEREBELOW PLEASE FIND MY INITIAL CONTACT/E-MAIL TO THEM. I NEVER RECEIVED ANY KIND OF REPLY. From: [REDACTED] [REDACTED]] Sent: Sunday, September 04, 2011 10:57 AM To: support@jerk.be Cc: AΛEΞANΔPA Subject: PLEASE REMOVE ME IMMEDIATELY -	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 10/6/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Other Payment Method (Note in Comments)	Agency Contact: External Agency

Complaint Date:	10/6/2011	Transaction Date:	
Initial Contact:	Internet Web Site	Initial Response:	
Statute/Rule:		Law Violation:	
Topic:		Dispute with Credit Bureau?:	
Dispute with Credit Bureau - Responded?:		Dispute with Credit Bureau - Resolved to Satisfaction?:	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	[REDACTED]	Last Name:	[REDACTED]
Address 1:	[REDACTED]	Address 2:	[REDACTED]
City:	ATHENS	State:	
Zip:	16451	Country:	GREECE
Home Number:	[REDACTED]	Work Number:	
Fax Number:		Ext:	
Email:	[REDACTED]	Age Range:	30 - 39
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Jerk.com		
Address:			
City:		State/Prov:	
ZIP:		Country:	
Email:	support@jerk.be	URL:	Jerk.com
Area Code:		Phone Number:	
Ext:			
Representative Name:		Title:	

CX0558

MARKED CONFIDENTIAL

Record # 26 / Consumer Sentinel Network Complaints	
Reference Number: 40221750	Originator Reference Number: 11208200432419372
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: I googled my name, just to see what would come up. I found the usual... facebook, twitter, old xanga accounts, etc. Then I see my name beside the word, Jerk . Perplexed, I clicked on it to see what in the world it was. To my shock, I see a photo of myself AND my child from December 2009, along with two Anonymous reports both saying the same thing about how I am a jerk . It states that I am selfish, care for no one but myself, let others run my life, I know no forgiveness, and it's not good for life points. There are quite a few typos and misspelled words. It states that these reports were made 268 days ago. The photo had to have been stolen from my facebook account; that is the only place that it exists besides my laptop. I do not like the fact that I am being slandered, and that anyone can view that photo of me and my child on a public website by simply googling my name. I need to know what actions I can take to get this mess taken off of this nasty and ridiculous website. I hope that the information regarding the owners is relevant, I obtained it from others who have been scammed by these awful people.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 8/20/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 8/20/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: BATESVILLE	State: Mississippi
Zip: 38606	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29

Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Lic	
Address: 419 Main Street	
City: Huntington Beach	State/Prov: California
ZIP: 92648-5199	Country: United States
Email: [REDACTED]	URL: www.jerk.com
Area Code: 714	Phone Number: 8412250
Ext:	
Representative Name: Louis or Louie Lardas	Title:

CX0559

MARKED CONFIDENTIAL

Record # 221 / Consumer Sentinel Network Complaints	
Reference Number: 34839667	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
<p>Comments: Dear Madam, Dear Sir, I hereby want file a complain about a company website : www.jerk.com. My foto and full name is shown on this website jerk.com against my personal will. If my name is entered in a search machine it shows up as "jerk: [REDACTED]". There has never been a consent, agreement or what so ever. The use of my personal identity and photograph in this pejorative context is simply abusive and persues a mere commercial interest. Could you please help me and remove my profile which is shown under: http://www.jerk.com/profile.php?id=[REDACTED] Due to the fact that my name and picture are used in connection with this insult this is a clear case of libel. There is a defamation of my person by written or printed words on the website and by the headline result which shows up in the search engine. As you have to pay to logon to "www.jerk.com" there is a commercial interest and my copyrights are violated. They claim a US\$ 25 charge just to send them an email in order to complain and ask for removal. Furthermore they require you to log in and charge additional money. This is a criminal behaviour. How could you stop this stealing and abuse of personal information. According to severral online forums, Ive just learned that I am not the only victim of such blackmailing. I dont want to pay them in order to get my copyrighted photo and insults removed. As a Columbia Law School Graduate my reputation is an essential asset in order to pursue my career in the legal profession. Thank you very much for your kind support in this matter! Yours sincerely [REDACTED] UPDATED: 2/7/2012 The consumer will contact IC3.gov dtoms</p>	
Data Reference:	
Entered By: FTCCIS-FTCUSER	Entry Date: 2/7/2012
Updated By: DTOMS	Updated Date: 2/7/2012
Complaint Source: FTC Online Complaint Assistant (CIS)	Product Service Code: Internet Information & Adult Services
Amount Requested: \$25.00	Amount Paid: \$0.00
Payment Method:	Agency Phone Contact:
Complaint Date: 2/7/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule: General Privacy	Law Violation: Company does not provide any opportunity for consumer to opt-out of information sharing
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?: N	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: Cologne	State:
Zip: 50677	Country: GERMANY
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:

Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL:
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:
Associated Subjects	
Company: Jerk Llc	
Company Type: Other	
Address: 16192 Coastal Hwy	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:

CX0560

MARKED CONFIDENTIAL

Record # 140 / Consumer Sentinel Network Complaints	
Reference Number: 35206293	Originator Reference Number: 1201181050132622
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: This site, JERK.COM , unknown to me based on searching on My name, my profile and unauthorized picture from facebook was placed on this site. So now when I'm goggled I show in this site. This site should be shut down.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 1/18/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 1/18/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name:	Last Name:
Address 1:	Address 2:
City: NEW PALTZ	State: New York
Zip: 12561	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email:	Age Range: 50 - 59
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: JERK.COM
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0561

MARKED CONFIDENTIAL

Record # 107 / Consumer Sentinel Network Complaints	
Reference Number: 35009521	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: This web site has a picture of my that I did not authorize to put on the web site. In order to remove or change the picture they want \$25. This is extortion.	
Data Reference:	
Entered By: FTCCIS-FTCUSER	Entry Date: 2/13/2012
Updated By:	Updated Date:
Complaint Source: FTC Online Complaint Assistant (CIS)	Product Service Code: Internet Information & Adult Services
Amount Requested: \$25.00	Amount Paid: \$0.00
Payment Method:	Agency Contact: Internet
Complaint Date: 2/13/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response: Unknown
Statute/Rule: General Privacy	Law Violation: Company does not provide any opportunity for consumer to opt out of information sharing
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1:	Address 2:
City:	State: California
Zip:	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country: United States
Email:	URL: http://jerk.com/profile.php [REDACTED]
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0562

MARKED CONFIDENTIAL

Record # 108 / Consumer Sentinel Network Complaints	
Reference Number: 37595972	Originator Reference Number: 11205080732433231
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: Respected Sir / Madam, There's a website www.jerk.com (also www.jerk.be) which randomly creates user profiles by 'stealing' name, photos and other personal information for facebook and such social network sites. A profile in my name is been created by them - http://www.jerk.com/profile.php?id= [REDACTED] Many people are been victims of their "online harassment" and "cyber bullying". (Suggested reading: http://www.ipwatchdog.com/2012/04/16/jerk-com-dealing-with-online-harassment-cyberbullying/id= 24211/) Though the website is not loading now, the url is been leased as they may return with similar url (and activities) soon. Kindly look into this matter and initiate necessary action against them as per the Law. Awaiting replies. Best Regards, [REDACTED] Phone: [REDACTED]	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 5/8/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 5/8/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: BANGALORE	State:
Zip: 560054	Country: INDIA
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: WWW.JERK.COM
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0563

MARKED CONFIDENTIAL

Record # 110 / Consumer Sentinel Network Complaints	
Reference Number:	35670197
Originator Reference Number:	11760098670143
Language:	English
Contact Type:	Complaint
Source:	Organization
DNC?	N
Comments:	Jerk.com is a spam website that randomly generates profiles for people using their copyrighted Facebook photos. It facilitates online libel. -- Additional Comments: First of all, Jerk.com should remove ALL copyrighted material that they have taken from people's Facebook profiles and elsewhere without their consent. More importantly, they should either allow people to remove their profiles or simply stop generating random profiles.
Data	
Reference:	
Entered By:	BBBCOCA-USER
Entry Date:	2/10/2012
Updated By:	BBBCOCA-USER
Updated Date:	3/5/2012
Complaint Source:	BBB CA Colton
Product Service Code:	Other (Note in Comments)
Amount Requested:	
Amount Paid:	
Payment Method:	
Agency Contact:	External Agency
Complaint Date:	2/10/2012
Transaction Date:	
Initial Contact:	
Initial Response:	
Statute/Rule:	
Law Violation:	
Topic:	
Dispute with Credit Bureau - Resolved to Satisfaction?:	
Dispute with Credit Bureau - Resolved to Satisfaction?:	
Member of armed forces or dependent?:	
Consumer Information	
Consumer - 1	
Complaining Company/Org:	
First Name:	
Last Name:	
Address 1:	
Address 2:	
City:	TORONTO
State:	Ontario, Canada
Zip:	
Country:	CANADA
Home Number:	
Work Number:	
Fax Number:	
Ext:	
Email:	
Age Range:	
Military Service Branch:	
Soldier Status:	
Soldier Station:	
Consumer - 2	
Complaining Company/Org:	
First Name:	
Last Name:	Not Provided
Address 1:	
Address 2:	
City:	
State:	
Zip:	
Country:	
Home Number:	
Work Number:	
Fax Number:	
Ext:	
Email:	
Age Range:	
Military Service Branch:	
Soldier Status:	
Soldier Station:	
Subject	

Subject: Jerk.com		
Address: 419 Main Street #277		
City: Huntington Beach	State/Prov: California	
ZIP: 92648	Country: United States	
Email:	URL: http://www.jerk.com	
Area Code:	Phone Number:	
Ext:		
Representative Name:	Title:	

CX0565

MARKED CONFIDENTIAL

Record # 95 / Consumer Sentinel Network Complaints	
Reference Number: 37664080	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: Consumer called to report that she googled herself and someone has placed her information on Jerk.com and she states that she can't contact the company. Consumer states that the website is posting minors information along with other stuff.	
Data Reference:	
Entered By: LKILPRATRICK	Entry Date: 5/22/2012
Updated By:	Updated Date:
Complaint Source: FTC Call Center	Product Service Code: Internet Information & Adult Services
Amount Requested: \$0.00	Amount Paid: \$0.00
Payment Method: Unknown	Agency Contact: Phone
Complaint Date: 5/22/2012	Transaction Date: 5/21/2012
Initial Contact: Internet Web Site	Initial Response: Unknown
Statute/Rule: FTC Act Sec 5 (BCP)	Law Violation: Deception/Misrepresentation
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?: N	Dispute with Credit Bureau - Resolved to Satisfaction?: N
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1:	Address 2:
City: Cleveland Heights	State: Ohio
Zip: 44118	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: jerk.com

Area Code:		Phone Number:	
Ext:			
Representative Name:		Title:	

CX0566

MARKED CONFIDENTIAL

Record # 137 / Consumer Sentinel Network Complaints	
Reference Number: 36579130	Originator Reference Number: 02510008982358
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: This website without my permission has created an account under my name, my picture probably taken from facebook.They are not allowing me to delete this account inspite of reporting abuse.i have never registered this site and given no information or permission --- Additional Comments: Deletion of my account from this website'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 4/9/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 4/9/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: INDIA	State: Location Not Reported
Zip: 40001	Country: LOCATION NOT REPORTED
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com

Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0567

MARKED CONFIDENTIAL

Record # 3 / Consumer Sentinel Network Complaints	
Reference Number: 40463351	Originator Reference Number: 11760098718514
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com stole my pictures from facebook and myspace and posted them on their website. They are my pictures taken with my camera. --- Additional Comments: I would like my pictures of me and my family removed. I would also like my name removed. I have submitted several DMCA takedown letters. '	
Data	
Reference:	
Entered By: BBBCOCA-USER	Entry Date: 9/10/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 9/10/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Resolved?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: NORFOLK	State: Virginia
Zip: 23503	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: [REDACTED]	Phone Number: [REDACTED]
Ext:	
Representative Name:	Title:

CX0568

MARKED CONFIDENTIAL

Record # 169 / Consumer Sentinel Network Complaints	
Reference Number: 34308296	Originator Reference Number: 1112222302533582
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "Record Details page - Data Reference field" on the Consumer Sentinel Network page for further details on IC3 data. --- Incident description: I just happened to put my name in google and realized my picture and name is on this site called Jerk. I have no idea how this company got my photo and name, they did not and still do not have permission to post my name and picture on this site and I want it removed. It is telling me that I can remove my page to another location for \$99.00 or send in a complaint and pay \$25.00 to file it. I am a police officer and the only site I am on is facebook. I do not like the fact that you can go on this site and see my photo and it also has a link to go to my work email.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 12/22/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Spyware\Adware\Malware
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 12/22/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: NEW BERN	State: North Carolina
Zip: 28562	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 40 - 49
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Lic	
Address: 16192 Coastal Hwy.	
City: Lewew	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: www.jerk.com/profile.php?id=10237703
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0569

MARKED CONFIDENTIAL

Record # 183 / Consumer Sentinel Network Complaints	
Reference Number: 37053859	Originator Reference Number: 1203020626146692
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: The copyright of one of my pictures has been infringed. I have uploaded a photo of me onto the social media platform "facebook", which I took myself in our family's caravan in the summer of 2009. This picture has been used on the website "jerk.com" in combination with my name without me knowing or approving usage. I am not a member of this website, which is intentionally using peoples' pictures and names in order to damage reputation.	
Data Reference:	More Information on Data Contributor Complaints?
Entered By: IC3-USER	Entry Date: 3/2/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 3/2/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name:	Last Name:
Address 1:	Address 2:
City:	State:
Zip:	Country: GERMANY
Home Number:	Work Number:
Fax Number:	Ext:
Email:	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	

City: Vancouver	State/Prov:
ZIP: BC 92648	Country: Canada
Email:	URL: http://www.jerk.com/profile.php?id [REDACTED]
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0570

MARKED CONFIDENTIAL

Record # 184 / Consumer Sentinel Network Complaints	
Reference Number: 34125738	Originator Reference Number: 02510008801314
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I recently google my name for a job and came across this web site, with a picture of me on it and you have to pay \$25.00 to remove it. in the account that was set up was not done by myself and someone stole this picture of me. due to the copyright infringement complaint I want my name removed from the web site. I have tried writing to them to no avail, when you hit the remove button you have to be a member and I do not want to sign up to be a member and this is what it says when you hit the delete button Remove me Just because you have a profile on Jerk does not mean you are a jerk. Less than 5% of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk, is not a jerk, or is a saint in the eyes of others. No one's profile is ever removed because Jerk is based on searching free open internet searching databases and it's not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php //!!!!!! DID NOT PAY, AND ANYONE CAN CREATE YOUR PROFILE AND UPLOAD PICTURES OF YOU. — Additional Comments: I would like BBB to please help me to get my profile down from this webpage and my name removed, & also for the webmaster to make sure you can delete other people names who did not put their names up on this site. The remove me button dose not let you remove yourself from the page. But most of all I want my name removed !!!! and my profile pic which was stolen from my facebook page. and my page is private...'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 11/9/2011
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 11/9/2011	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: MILLIVILLE	State: New Jersey
Zip: 08332	Country: UNITED STATES
Home Number: [REDACTED]	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy	
City: Lewes	State/Prov: Delaware

ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0571

MARKED CONFIDENTIAL

Record # 239 / Consumer Sentinel Network Complaints	
Reference Number: 35722442	Originator Reference Number: 11760098665792
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com stole my picture from my facebook account and posted it on their site without my permission. -- Additional Comments: I want all information including my picture to be removed from their site. Jerk.com is guilty of extortion for requesting payment for removal of my name. '	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 1/24/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 1/24/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer - 1	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: MILWAUKEE	State: Wisconsin
Zip: 53213	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Consumer - 2	
Complaining Company/Org:	
First Name:	Last Name: Not Provided
Address 1:	Address 2:
City:	State:
Zip:	Country:

Home Number:	Work Number:
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0572

MARKED CONFIDENTIAL

Record # 19 / Consumer Sentinel Network Complaints	
Reference Number: 40030159	Originator Reference Number: 02510009186386
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: This website has used my name and photograph (pulled from Facebook) without my consent! There is no way of contacting anyone on this website. There is a page if you want to remove yourself, which I have done several times, but it has not deleted my information. There is an email address to write to but they charge you to send an email??!!!! have read online that several people have had the same problem contacting them and trying to delete their information. This is a ridiculous website and NEEDS to be shut done!!! Who charges you to send an email for any request and this website is drawing people to bully and make ill remarks about anyone which is not right. Please help to get my name and photo taken off this website and close this website down! --- Additional Comments: I would like my name and photo taken off this website and close this website down!	
Data	
Reference:	
Entered By: BBBDEL-USER	Entry Date: 8/23/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 8/23/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: COVINA	State: California
Zip: 91723	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	

Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name: John Fanning	Title:

CX0573

MARKED CONFIDENTIAL

Record # 207 / Consumer Sentinel Network Complaints	
Reference Number: 35654968	Originator Reference Number: 11202170856569612
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: In a google search of 14 year old daughter on Feb 15, 2012, the first entry that popped up was a site we had never heard of, jerk.com . It seems that this website is automatically creating profiles for people who are unaware. It took my daughters name and an old photo which had been deleted from Facebook about a year ago. The website gives people opportunity to vote if the person in the profile is jerk or not. It allows people to write anything they want about the person. You can also buy or sell personal information about people such as phone numbers, email addresses, on their profile. We are unable to delete the false profile, and the site wants payment to communicate with their customer support. You can imagine that this is an upsetting situation for a 14 year old girl.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 2/17/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 2/17/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: GROSSE POINTE FARMS	State: Michigan
Zip: 48236	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 40 - 49
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country: United States
Email:	URL: Jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0574

MARKED CONFIDENTIAL

Record # 227 / Consumer Sentinel Network Complaints	
Reference Number: 31861834	Originator Reference Number: 02410008642911
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: (I apologize if that's not the correct classification.) A website called jerk.com took a photo of mine and my name without permission, the photo was taken by me and it's owned by me, and it was posted to facebook (privacy set so it was visible only to friends). The website claims it doesn't remove any profiles because 'this is the internet and nothing can be deleted on the internet' (or something along those lines). It says there's a copyright infringement form 'coming soon' (which I seriously doubt). There is no way I can find to contact the webmaster, and even if there was, I'd be hesitant to simply because it seems like the type of website that will just spam you even more if you try to contact them. I want the photo taken down at the very least, as it's my private property. I don't know if it's possible to also ask them to remove my name, but I'd very much appreciate it if that's possible. Thanks for your time. -- Additional Comments: To have my photo and name removed.'	
Data Reference:	
Entered By: BBBDC-USER	Entry Date: 6/22/2011
Updated By:	Updated Date:
Complaint Source: BBB DC Washington	Product Service Code: Social Networking Service
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 6/22/2011	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: CHARLOTTESVILLE	State: Virginia
Zip: 22903	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: [REDACTED]	
City: Silver Spring	State/Prov: Maryland
ZIP: 20910	Country: United States
Email:	URL:
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0575

MARKED CONFIDENTIAL

Record # 60 / Consumer Sentinel Network Complaints	
Reference Number: 39562073	Originator Reference Number: 11760098706878
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com created a fake profile for me using a picture from my facebook account. This was done w/o my permission. I would like it to be removed. -- Additional Comments: I would like this website to take down my profile, picture and all my information that is currently posted.	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 7/24/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 7/24/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: PASADENA	State: California
Zip: 91106	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0576

MARKED CONFIDENTIAL

Record # 259 / Consumer Sentinel Network Complaints	
Reference Number: 35153660	Originator Reference Number: 11201041726015862
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: Someone has created an unauthorised profile for me on Jerk.com and used a personal & private picture of me with my wife. The picture was taken from our Facebook profile and is being used by this website. There is no way to contact this company -- they charge a \$25 "fee" if you want to contact them. This is a scam and it is slander and cyber bullying. We want to take the strongest action we can to shut this site down.	
Data Reference:	More Information on Data Contributor Complaints?
Entered By: IC3-USER	Entry Date: 1/4/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 1/4/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: BERKELEY	State: California
Zip: 94708	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 40 - 49
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: Unknown Unknown	

City:		State/Prov:	Location Not Reported
ZIP:		Country:	Location Not Reported
Email:		URL:	www.jerk.com
Area Code:		Phone Number:	
Ext:			
Representative Name:	Unknown Unknown	Title:	

CX0577

MARKED CONFIDENTIAL

Record # 93 / Consumer Sentinel Network Complaints	
Reference Number: 37717192	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: Consumer states someone has placed her picture and some information about her on Jerk.com. Consumer clicked on remove me and it states Just because you have a profile on Jerk does not mean you are a jerk. Less than 5% of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk, is not a jerk, or is a saint in the eyes of others. No one's profile is ever removed because Jerk is based on searching free open internetsearching databases and it's not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php Consumer wants this information to be removed & does not feel this is right.	
Data	
Reference:	
Entered By: HLAMBERT	Entry Date: 5/23/2012
Updated By:	Updated Date:
Complaint Source: FTC Call Center	Product Service Code: Internet Information & Adult Services
Amount Requested: \$0.00	Amount Paid: \$0.00
Payment Method: Unknown	Agency Contact: Phone
Complaint Date: 5/23/2012	Transaction Date: 1/1/2012
Initial Contact: Internet Web Site	Initial Response: Unknown
Statute/Rule: FTC Act Sec 5 (BCP)	Law Violation: Deception/Misrepresentation
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?: N	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?: Yes	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: Los Angeles	State: California
Zip: 90043	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email:	Age Range: 20 - 29
Military Service Branch: U.S. Air Force	Soldier Status: Active Duty Service Member
Soldier Station:	
Subject	
Subject: Jerk.com	

Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0578

MARKED CONFIDENTIAL

Record # 219 / Consumer Sentinel Network Complaints	
Reference Number: 35194100	Originator Reference Number: 11202082119322561
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. -- Incident description: The website jerk.com has taken my profile picture off of Facebook and created an entire profile on their website. I have tried to remove it, but couldn't. A lot of other people have also been victimized by this website, could you please remove it.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 2/8/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Spyware\Adware\Malware
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 2/8/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: FREMONT	State: California
Zip: 94536	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 18 - 19
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:

Email:	URL: jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0579

MARKED CONFIDENTIAL



PRINT

Consumer Sentinel Network Complaints

Record # 101 / Consumer Sentinel Network Complaints	
Reference Number: 37604349	Originator Reference Number: 1205111046401721
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. -- Incident description: MY PHOTO WAS STOLEN FROM FACEBOOK AND USED WITHOUT MY PERMISSION ON THEIR WEBSITE TO SLANDER AND EMBARRESS ME. THIS IS ILLEGAL AND HAS BEEN HAPPENING TO THOUSANDS OF OTHERS.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 5/11/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Unsolicited Email
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 5/11/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: OXFORD	State: Maine
Zip: 04270	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:

Email: [REDACTED]	Age Range: 30 - 39
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Www.jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: WWW.JERK.COM
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0580

MARKED CONFIDENTIAL

Record # 31 / Consumer Sentinel Network Complaints	
Reference Number: 40375649	Originator Reference Number: 11760098712636
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com is using my name and facebook pictures with out any permission what so ever and refuses to take remove my profile. — Additional Comments: I would like jerk.com to remove the profile that or has set up without my knowing or permission.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 8/16/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 8/16/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: LAPEER	State: Michigan
Zip: 48446	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0581

MARKED CONFIDENTIAL

Record # 123 / Consumer Sentinel Network Complaints	
Reference Number: 36710300	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: jerk.com has illegally taken an old deleted picture from Facebook and has included my picture, which I legally own, as well as my name and information to use on their site to create a profile whereby anyone can vote if the person is a jerk or not and anyone can provide personal information and infringe upon a persons right to privacy. I am concerned as a professional with a reputation to uphold and as a female for potential threat to my personal security and safety if information should be included about my address etc, since my picture is already o this site . This site is asking to be paid to have the data removed and even then it states that its up to the site. I am very concerned about this site and the harm it can potentially do. I have read in blogs that childrens information is being stolen as well and posted on jerk.com !!! How can this be allowed to continue? How can this site be allowed to still be allowed?	
Data Reference:	
Entered By: FTCCIS-FTCUSER	Entry Date: 4/24/2012
Updated By:	Updated Date:
Complaint Source: FTC Online Complaint Assistant (CIS)	Product Service Code: Internet Information & Adult Services
Amount Requested: \$25.00	Amount Paid: \$0.00
Payment Method:	Agency Contact: Internet
Complaint Date: 4/24/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule: General Privacy	Law Violation: Company does not provide any opportunity for consumer to opt-out of information sharing
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: port moody	State:
Zip: v3h5a3	Country: CANADA
Home Number: [REDACTED]	Work Number: 000-0000000
Fax Number:	Ext: 00000
Email: [REDACTED]	Age Range: 40 - 49
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country: United States
Email:	URL: jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0582

MARKED CONFIDENTIAL

Record # 217 / Consumer Sentinel Network Complaints	
Reference Number: 32294664	Originator Reference Number: 1108171236022961
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: I was on the Internet yesterday, Tuesday August 16th, 2011 I searched my name on www.google.com in order to find images from a half-marathon I participated in over the weekend. A website called www.jerk.com appeared. I clicked on it and it went to my 'profile' on their site. My full name is listed along with a photograph of myself that I own the rights too. The photograph was at one time my profile picture on www.facebook.com but was removed from facebook approximately a month and a half ago. My facebook profile and photographs are private so the information was stolen from me without my consent. I would the profile on www.jerk.com and the picture to be removed. It appears this website serves a sole purpose of maliciousness and poor taste. A photograph of me that is my property is on the internet against my knowledge and consent. It is on the website www.jerk.com	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 8/17/2011
Updated By: Internet Crime Complaint Center	Updated Date: Internet Information & Adult Services
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 8/17/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: CHICAGO	State: Illinois
Zip: 60622	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Www.jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	

Representative Name: unknown unknown	Title:
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CX0583

MARKED CONFIDENTIAL



PRINT

Consumer Sentinel Network Complaints

Record # 201 / Consumer Sentinel Network Complaints	
Reference Number: 36689969	Originator Reference Number: 02510008922419
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: On the website jerk.com , my profile picture from Facebook appears on it. The picture on it was put on this website without permission. I would like it taken down. I was only sixteen years old when that photograph was taken and can prove it was me. I never ever want to be on this page. -- Additional Comments: I would like my picture and profile taken off the website jerk.com . I never was a member of this website and the photo that was used was taken from me off my Facebook page. I was a only a minor when that photo was taken. I never ever want to be on this page. '	
Data	
Reference:	
Entered By: BBBDEL-USER	Entry Date: 2/21/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 2/21/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: MADISON HEIGHTS	State: Michigan
Zip: 48071	Country: UNITED STATES
Home Number:	Work Number:

Fax Number:		Ext:	
Email:	[REDACTED]	Age Range:	
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Jerk Llc		
Address:	16192 Coastal Hwy.		
City:	Lewes	State/Prov:	Delaware
ZIP:	19958	Country:	United States
Email:		URL:	http://www.jerk.com
Area Code:		Phone Number:	
Ext:			
Representative Name:		Title:	

CX0584

MARKED CONFIDENTIAL

Record # 223 / Consumer Sentinel Network Complaints	
Reference Number: 31776260	Originator Reference Number: 11107240223243771
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: jerk.com seems to be a website that grabs photographic and name information from facebook (or cached facebook) pages and posts it on the internet. The site contains various offensive materials, such as postings by users with racist, sexist and other malicious speech. For example, as of 07/23/2011 the front page contains posts by users like "Burn the Jews" and "Kill all Niggers". I am absolutely outraged that searches for my name on this website point to my image and name. It is absolutely unacceptable since I DID NOT Post this information on this website. Various search engine queries for my name also point to this website. There is no contact information on the website to file a complaint. What is even worse is that they require payment for you to sign-up an remove this content. The image I posted on facebook.com are solely my property and hence I own the copyright on them. I can prove this by providing digital copies of the exact image posted by jerk.com on their website. I should not be needed to pay anyone to remove this content from the website. It is a form of extortion that they require payment and sign-up in order to remove what is undoubtedly my property. The fact that my name and image are posted on this website is in a way defaming my character. As they have associated my identity with a website titled "jerk" and where anonymous users post offensive writings. The fact that a simple search for my name leads to this website shows that this behavior by jerk.com can severely affect my personal and professional life.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 7/24/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 7/24/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: KIRKLAND	State: Washington
Zip: 98033	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street	

City:	Huntington Beach	State/Prov:	California
ZIP:	92648	Country:	United States
Email:	inquire@whois.privacyservices.com	URL:	jerk.com
Area Code:	800	Phone Number:	9696155
Ext:			
Representative Name:		Title:	

CX0585

MARKED CONFIDENTIAL

Record # 144 / Consumer Sentinel Network Complaints	
Reference Number: 36706382	Originator Reference Number: 02510008981689
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I recently found my name and picture on a site called jerk.com The picture was taken from my Facebook profile. I did not authorize for my name and/or picture to be posted on such a site. --- Additional Comments: I demand they remove my name and picture from their site. '	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 4/4/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 4/4/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: ORLEANS	State: Ontario, Canada
Zip:	Country: CANADA
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com

Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0586

MARKED CONFIDENTIAL

Record # 292 / Consumer Sentinel Network Complaints	
Reference Number: 34278707	Originator Reference Number: 11760098648819
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Someone took my first name, last name, amp picture and created a profile without my consent. -- Additional Comments: I want them to remove my profile and never use my information again. Also, do not use/send any of my information to other websites or companies.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 11/4/2011
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 11/4/2011	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: PARK RIDGE	State: Illinois
Zip: 60068	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0587

MARKED CONFIDENTIAL

Record # 157 / Consumer Sentinel Network Complaints	
Reference Number: 35164681	Originator Reference Number: 11201021535512781
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: I recently googled my name and found a photograph that was taken 2 years ago on a website called Jerk.com with my name. I was unable to remove the profile and even registered to find a way to contact them. However, a fee of \$25 'for support' was required which I did not pay. I believe the photo came from Facebook, even though I deleted all photos and my profile from Facebook over a year ago. More complaints and detailed information about this site can be found on 'Google and jerk.com' which is where it was recommended by some that a complaint should be filed with yourself. I'm particularly distressed as I have discovered 2 on-line telephone directory websites in the UK which can provide address and family member details. Fortunately, these websites give the option to remove private information and I have submitted this request. However, until then, someone can access my name and with the photo from jerk.com find me.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 1/2/2012
Updated By: Internet Crime Complaint Center	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 1/2/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: DERRY CITY	State:
Zip: BT48 9NX	Country: UNITED KINGDOM
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 30 - 39
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277 Huntington Beach	
City:	State/Prov: California
ZIP: 92648	Country: United States
Email: support@jerk.com	URL: http://www.jerk.com/profile.php?id=[REDACTED]
Area Code: 781	Phone Number: 9253373
Ext:	

Representative Name: Jerk.com	Title:
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CX0588

MARKED CONFIDENTIAL

Record # 170 / Consumer Sentinel Network Complaints	
Reference Number: 34095428	Originator Reference Number: 02510008850735
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: This website pulls information from other websites (even if privacy settings are high), especially social networking sites, and then allows people to vote on whether or not they are a 'jerk.' They also allow people to ADD pages for people to this website. I, somehow, was unknowingly added to this website. They do NOT offer a method of removal of this information, which can include photos and personal information, unless you pay \$99/year to have your jerk.com page redirected to the site of your choice. This is gross exploitative behavior libelous. It is dangerous in many ways to personal privacy and people's reputations. — Additional Comments: I would like for this site to offer a removal option, or for the website to be terminated.'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 12/21/2011
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 12/21/2011	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address: [REDACTED]	Address 2:
City: CLEMENTON	State: New Jersey
Zip: 08021	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	Title:
Representative Name:	

CX0589

MARKED CONFIDENTIAL

Record # 97 / Consumer Sentinel Network Complaints	
Reference Number: 35655786	Originator Reference Number: 11202221221349581
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. — Incident description: Dear FBI, I hope you can help me with this deeply distressing situation to deal with an illegal website which is I believe could be involved with theft of Facebook profiles and something that is close to blackmail. I am a UK born and bred citizen and initially made a complaint to the UK police. I and it seems a number of people have found that due to some malicious process (claimed to be a Facebook app) my Facebook account has been hacked and a clear photo and my name put on a website called jerk.com and jerk.be without my authorisation. The only way to remove this is to pay the website owner. This is surely illegal and a form of blackmail. This site appears very high in searches when you google a name and this is a particular problem for me as my name is very unique. I was at one point on the homepage of this website asking to vote if I was unique name which led to some very sleepless nights. The website seems to be run by someone called John Fanning john@netcapital.com The website is an abuse website which invites people to abuse a profile created stolen from Facebook and add lots of contact details including phone number and address. I have a distinct clear photo and a very unique name on a profile (link provided). http://www.jerk.com/profile.php I am of an [redacted] background, and in the photo I'm wearing religious head covering which I'm sure is going to contribute to lots of racist abuse especially from people who will automatically assume I am from an [redacted] background. Please can you help all the people especially those whose children are suffering at the moment who are finding that their lives are being ruined by this malicious illegal website who have managed to hack into facebook. I am more than happy to call or receive calls and take this forward as quickly as possible. Many thanks for your help. I look forward to hearing from you. [redacted]	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 2/22/2012
Updated By: Internet Crime Complaint Center	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 2/22/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [redacted]	Last Name: [redacted]
Address 1: [redacted]	Address 2: [redacted]
City: LONDON	State:
Zip: en12aw	Country: UNITED KINGDOM
Home Number: [redacted]	Work Number:
Fax Number:	Ext:
Email: [redacted]	Age Range: 40 - 49
Military Service Branch:	Soldier Status:
Soldier Station:	

Subject	
Subject: Jerk	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: http://www.jerk.com or http://www.jerk.be
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0590

MARKED CONFIDENTIAL



PRINT

Consumer Sentinel Network Complaints

Record # 101 / Consumer Sentinel Network Complaints	
Reference Number: 35678872	Originator Reference Number: 02510008924221
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: To whom this may concern: http://jerk.com/profile.php? [REDACTED] The aforementioned link contains my name and my picture. I would like the entire profile to be removed due to its defamatory nature. Although jerk.com website says, 'No one's profile is ever removed because Jerk is based on searching free open internet searching databases', and that 'it's not possible to remove things from the Internet', I believe the responsibility of removing my profile lies on the owner/administration of jerk.com , as I am not asking them to remove the content from an arbitrary website; rather, I am asking to remove the information that they have extracted from my facebook.com profile, and without my permission posted it on their website. My numerous attempts to contact the administration of jerk.com were unsuccessful; as it turns out, the 'support' email that they provide on their website is not existing. I will really appreciate if you could help me with this. Sincerely, [REDACTED] Additional Comments: I would like the profile situated under the link http://jerk.com/profile.php? [REDACTED] to be removed from jerk.com website. I do not want any of my information (name, picture, etc.) on jerk.com . I have never posted it, it was extracted from my facebook.com profile, and posted on jerk.com without my permission.	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 2/21/2012
Updated By: BBB DE Wilmington	Updated Date:
Complaint Source:	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 2/21/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer - 1	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address: [REDACTED]	Address 2: [REDACTED]
City: SEMINOLE	State: Florida
Zip: 33772	Country: UNITED STATES
Home Number: [REDACTED]	Work Number: [REDACTED]
Fax Number:	Ext:

Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Consumer - 2	
Complaining Company/Org:	
First Name:	Last Name: Not Provided
Address 1:	Address 2:
City:	State:
Zip:	Country:
Home Number:	Work Number:
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0591

MARKED CONFIDENTIAL

Record # 167 / Consumer Sentinel Network Complaints	
Reference Number: 35556063	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: I found a profile under my name on this site, though I have never had contact with them. The nature of the site must be cyberbullying. Firstly they offer no possibility of removing the profile, and in order to even contact them they demand a payment of \$25 (which I didnt pay) . They are also asking other users to buy and sell personal information about me. This is the content under my name on the profile page. "Nominate this person for Jerk of the day" age: buy sell address: buy sell city: buy sell zip code: buy sell country: buy sell mobile: buy sell msn: buy sell email: buy sell occupation: buy sell employer: buy sell home phone: buy sell work phone: buy sell licence plate: buy sell facebook: buy sell myspace: buy sell ebay: buy sell linked in: buy sell Naturally I am terrified, not only is my personal information open for public auction, but I am branded as a Jerk and have no way to contact them or find who posted this profile fraudulently. I dont think sites like this should be permitted to encourage not only cyber bullying but also identity theft. Please help me. I have to remove my name from this site somehow, and also wish to find out who did this as I feel very nervous now that someone has done this to me intentionally. Unfortunately the company has nearly no information on their site as to how to contact them. Thank you for any help in advance [REDACTED]	
Data Reference:	
Entered By: FTCCIS-FTCUSER	Entry Date: 3/16/2012
Updated By:	Updated Date:
Complaint Source: FTC Online Complaint Assistant (CIS)	Product Service Code: Internet Information & Adult Services
Amount Requested: \$25.00	Amount Paid: \$0.00
Payment Method:	Agency Contact: Internet
Complaint Date: 3/1/2012	Transaction Date:
Initial Contact: Internet (Other)	Initial Response:
Statute/Rule: General Privacy	Law Violation: Company does not provide any opportunity for consumer to opt-out of information sharing
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of No armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1:	Address 2:
City:	State:
Zip:	Country: UNITED KINGDOM
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:

Military Service Branch:	Soldier Status:
Soldier Station:	Subject
Subject: Jerk Lic	
Address: 16192 Coastal Hwy. Lewes, DE 19958	
City:	State/Prov:
ZIP:	Country: United States
Email:	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0592

MARKED CONFIDENTIAL

Record # 117 / Consumer Sentinel Network Complaints	
Reference Number: 37339701	Originator Reference Number: 02510009009897
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I recently discovered a picture of my three children (all under the age of 13) on the jerk.com website. I could see no way of even contacting the company to ask them to remove the picture without joining 'jerk.com' or paying a \$25 fee. I could find no way to contact jerk.com customer service to get this issue resolved. I do not know where they got the picture of my children. The copyright of the picture belongs to me, as I took the picture, and I certainly never gave them permission to use the picture. I have never heard of the website before today. Obviously, in this day and age of online predators, I am very concerned with any images of my kids being online. My only concern is to keep my kids safe. I only ask that jerk.com remove the picture of my children from their website. Thank you for your help and assistance in dealing with this matter concerning the business jerk.com. Very Respectfully, — Additional Comments: I only ask that jerk.com remove the picture of my children from their website.	
Data	
Reference:	
Entered By: BBBDEL-USER	Entry Date: 5/2/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 5/2/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: VIRGINIA BEACH	State: Virginia
Zip: 23456	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0593

MARKED CONFIDENTIAL

Record # 149 / Consumer Sentinel Network Complaints	
Reference Number: 36618510	Originator Reference Number: 11760098681616
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com has published my name and a photograph taken from facebook on their website. Visitors are asked to vote whether or not I am a aposjerkapos. -- Additional Comments: I would like jerk.com to remove my photo and profile page from their website. Jerk.comaposs business model seems to be to add individuals to their website without their consent in order to pressure them into paying for a membership so that they have greater control over their profile. Given that this unethical and hopefully illegal in some way, I would ideally like to see them prosecuted and shut down entirely so that others donapost run into the same trouble.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 3/30/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 3/30/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: BOSTON	State: Massachusetts
Zip: 02113	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California

ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com
Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0594

MARKED CONFIDENTIAL

Record # 222 / Consumer Sentinel Network Complaints	
Reference Number: 31774881	Originator Reference Number: 1107250213127901
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. --- Incident description: A picture of me (stolen from facebook profile) as the profile picture of an account under my name ([REDACTED]) at Jerk.com. I did not make this profile. I am a student entering the professional world and do not want to be disadvantaged by it.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 7/25/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 7/25/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: ITHACA	State: New York
Zip: 14850	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email: inquire@whois.privacyservices.com	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0595

MARKED CONFIDENTIAL

Record # 69 / Consumer Sentinel Network Complaints	
Reference Number: 36029623	Originator Reference Number: 02510008955119
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I googled my name and found me listed on this site. Not only did I find my profile and my picture, I had no idea that this site even had these pieces of information. I went to there link so called 'remove me' which popped up with a message that said 'you can't just remove things from the internet' obviously that link is misleading and a violation of the law. I am very concerned for my safety and the well-being of my family especially being that of an active duty military member. This website had no consent for this information and should be shut down for violations of privacy. — Additional Comments: I want my information taken off this site.'	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 3/15/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 3/15/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: LAYTON	State: Utah
Zip: 84041	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0596

MARKED CONFIDENTIAL

Record # 28 / Consumer Sentinel Network Complaints	
Reference Number: 39936969	Originator Reference Number: 02510009179202
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com has made a profile for me on their website URL: http://www.jerk.com [REDACTED] [REDACTED] They have done this without my consent and are using a picture of me that they do NOT have my permission to use. I own the picture, I took it myself for a photography project when I was a minor in high school. I would like the profile taken down, but they refuse to unless I pay a ridiculous sum of money. I will take legal action if you are unable to help me. Please help me get this profile removed. It has been tracking my other online actions and I feel unsafe and victimized by this website. Thank you very much. — Additional Comments: To have the profile using my name and image (which I did not consent to in any way, shape or form) taken down from the website.'	
Data	
Reference:	
Entered By: BBBDEL-USER	Entry Date: 8/20/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 8/20/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: PINOLE	State: California
Zip: 94564	Country: UNITED STATES
Home Number: [REDACTED]	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	

Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name: John Fanning	Title:

CX0597

MARKED CONFIDENTIAL

Record # 211 / Consumer Sentinel Network Complaints	
Reference Number: 32518786	Originator Reference Number: 1109150010102671
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: The site, jerk.com was somehow able to illegally obtain a photo of me from my facebook website and display it on their site where others can post information to slander me	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 9/15/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 9/15/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: BALDWINSVILLE	State: New York
Zip: 13027	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 30 - 39
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: Tipografiei nr.1, 720043	
City: Suceava	State/Prov:
ZIP: 720043	Country: Romania
Email: contact-us@assist.ro	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0598

MARKED CONFIDENTIAL

Record # 81 / Consumer Sentinel Network Complaints	
Reference Number: 36617941	Originator Reference Number: 11760098675439
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: The reason I need my page removed is because my father who is in jail is coming out and I worry about my safety. — Additional Comments: I need them to delete my account.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 3/5/2012
Updated By: BBB CA Colton	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 3/5/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: NEW YORK	State: New York
Zip: 10029	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number: [REDACTED]	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com
Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0599

MARKED CONFIDENTIAL

Record # 208 / Consumer Sentinel Network Complaints	
Reference Number: 32627203	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: www.jerk.com While searching my name on Google I came across this website. I never signed up for it, yet they made a profile for me and somehow got a picture of my little brother laying down next to my (dead) dog. I used this photo as a profile picture on facebook (Profile is always locked down to max security settings provided). I clicked a "Remove Me" link on the site and this is what I got: "Just because you have a profile on Jerk does not mean you are a jerk. Less than 5 of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk, is not a jerk, or is a saint in the eyes of others. No one's profile IS EVER REMOVED because Jerk is based on searching free open internet searching databases and its not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php" Then I clicked on the "Contact" button at the bottom of their webpage, and I got this: "If you are not logged in there is a service charge of \$25 for support. This charge is refundable at our sole discretion." I do not have, and I do not want, a profile. This company has overstepped their bounds and then to tell me I cant remove a picture I own, and then if I want to contact them I have to pay \$25.....	
Data:	
Reference:	Entry Date: 9/24/2011
Entered By: FTCCIS-FTCUSER	Updated Date:
Updated By:	Product Service Code: Internet Information & Adult Services
Complaint Source: FTC Online Complaint Assistant (CIS)	Amount Paid: \$0.00
Amount: \$0.00	
Requested:	Agency Contact: Internet
Payment Method: Not Reported	Transaction Date:
Complaint Date: 9/24/2011	Initial Response: Unknown
Initial Contact: Internet Web Site	
Statute/Rule: General Privacy	Law Violation: Company does not provide any opportunity for consumer to opt out of information sharing
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: Saint Louis	State: Missouri
Zip: 63127	Country: UNITED STATES
Home Number: [REDACTED]	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country: United States

Email:	URL:
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0600

MARKED CONFIDENTIAL

Record # 189 / Consumer Sentinel Network Complaints	
Reference Number: 35655035	Originator Reference Number: 1202251434133261
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: This website took a copyrighted picture of mine from my facebook page (a picture of myself and my fiance) and used my photograph on their website. The website is being used to harm people, defame their character, and promote hate. It posts pictures of people without their permission and presents the question: Is [person's name] a Jerk? People can then vote and post comments.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 2/25/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 2/25/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: PHILADELPHIA	State: Pennsylvania
Zip: 19128	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 30 - 39
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com Net Capital	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California

ZIP: 92648	Country: United States
Email: [REDACTED]	URL: jerk.com
Area Code: [REDACTED]	Phone Number: [REDACTED]
Ext:	
Representative Name: John Fanning	Title:

CX0601

MARKED CONFIDENTIAL

Record # 83 / Consumer Sentinel Network Complaints	
Reference Number: 37040864	Originator Reference Number: 11203010011046712
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: Recently, when searching through google for my SEO ranking, I came upon a website called jerk.com , it's a silly little website that has taken my photo, and my name, and published it online. It also claims to buy and sell information about me, this is terribly frightening and to remove my listing they are asking for my credit card number, or even to contact them. The domain registrar won't do anything for me and there is no way to contact jerk.com . They have stolen my photo from likely a website such as facebook, and they have hurt my SEO and identity credibility by posing as me and asking (as me) "Am I a Jerk?" Please help, thank you, [REDACTED]	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 3/1/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 3/1/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: WALLINGFORD	State: Connecticut
Zip: 06492	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 40 - 49
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0602

MARKED CONFIDENTIAL

Record # 9 / Consumer Sentinel Network Complaints	
Reference Number: 40351570	Originator Reference Number: 11760098717234
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com has taken my photos and name from Facebook and posted them on their website without my permission and will not remove them unless I pay --- Additional Comments: I want my name removed, photos removed, and unauthorized profile deleted.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 9/4/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 9/4/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: LOS ANGELES	State: California
Zip: 90007	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0603

MARKED CONFIDENTIAL

Record # 221 / Consumer Sentinel Network Complaints	
Reference Number: 31778961	Originator Reference Number: 1107291906437932
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: Below, is the email that I wrote to the owner of jerk.com I joined the site to remove my name and information off there site only I could never get on the site because they wouldnt send a password... I dont know who put my name and picture from my account on facebook. they have put my phone number and address this isnt right. They charge me 3.00 a month with paypal and they never gave me a password so basically I could never get on the site. I know this is a small amount. But if they do this to everyone it can add up bottom line they are frauding people plus they are giving out and using pictures that they dont have permission to use. Dear John, I was goggling my name to see my web sites SEO rankings and noticed a new listing that has my name on it called Jerk.com . It is a web site that lets your 'rate jerks'. While I am supposedly 100% saint at the moment I would rather not have a profile on this site it appears pretty easy to 'jerk' someone and lets face it no one wants negative stuff about them. It seems they got me from face book as the picture on it is my face book picture and I do not use any other Internet services with photos. I have my face book profile on everything only viewable by friends and do not add strangers, so I am puzzled as to how they even got my profile pic. Do you guys think I can get them to remove my profile from their site in any way? In their removal section, they say: "Just because you have a profile on jerk.com does not mean you are a jerk . Less than 5% of the millions of people on jerk.com are jerks. Jerk.com is where you find out if someone is a jerk , is not a jerk , or is a saint in the eyes of others. No one's profile is ever removed because jerk.com is based on searching free open Internet searching databases and it's not possible to remove things from the Internet. You can however use jerk.com to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available" I then bought your services to remove my name from your site, you see, You don't have my permission, to use your image, which I have ownership rights to, you need to remove my name and picture immediately. I am a professorial who doesn't need to have false info on the net. I am sure you can understand this. I look forward in hearing from you about this matter. I will bring this to my attorneys attention, if no action is taken. Thank you. [REDACTED] [REDACTED] Rn --- Specified Other Payment: paypal.com	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 7/29/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$3.00
Payment Method: Other Payment Method (Note in Comments)	Agency Contact: External Agency
Complaint Date: 7/29/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: HOLLAND MI	State: Michigan
Zip: 49424	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:

Fax Number:		Ext:	
Email:	██████████	Age Range:	50 - 59
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Jerk.com		
Address:			
City:		State/Prov:	
ZIP:		Country:	
Email:		URL:	Jerk.com
Area Code:		Phone Number:	
Ext:			
Representative Name:		Title:	

CX0604

MARKED CONFIDENTIAL

Record # 177 / Consumer Sentinel Network Complaints	
Reference Number: 35864436	Originator Reference Number: 02510008946055
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: An account/profile has been set up in my name on jerk.com with my name and photo Jerk :: [REDACTED] Bulgerwww.jerk.com/profile.php?id=[REDACTED] did not do this or authorize anyone to do it for me.Jerk.com will not take the profile downCan you please help me and have this profile removed from their site -- Additional Comments: To have my profile removed from this horrible web site'	
Data	
Reference:	
Entered By: BBBDEL-USER	Entry Date: 3/8/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 3/8/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer - 1	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: GUELPH	State: Ontario, Canada
Zip:	Country: CANADA
Home Number: [REDACTED]	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Consumer - 2	
Complaining Company/Org:	
First Name:	Last Name: Not Provided
Address 1:	Address 2:
City:	State:

Zip:	Country:
Home Number:	Work Number:
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0605

MARKED CONFIDENTIAL

Record # 99 / Consumer Sentinel Network Complaints	
Reference Number: 37596065	Originator Reference Number: 02510009036493
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: This site is a complete scam, they want you to pay \$95/yr to have your name taken off of the list. This only purpose of the site is to trash other people. I did not in any way shape or form signup for this site or any of its known affiliates. The information used to create the profile was taken off of my private profiles on social media sites liek Google or Facebook. I have tried to contact the company, but in order to even send them an email they want you to pay \$25. I have consulted with my aterony on this matter, and she informed me that since I am a minor in the state of Colorado, it is unlawfull for them to posses my private information and photgraphs and make them avaible to the general public. --- Additional Comments: I would like to see the site shutdown, however, I am aware that the BBB does not have the authority(?) to do so. I would just like to see that the matter becomes more aware to the government, and the public about the 'service' and how they use/obtain one's information.'	
Data	
Reference:	
Entered By: BBBDEL-USER	Entry Date: 5/14/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 5/14/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: ELBERT	State: Colorado
Zip: 80106	Country: UNITED STATES
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0606

MARKED CONFIDENTIAL

Record # 307 / Consumer Sentinel Network Complaints	
Reference Number: 33036133	Originator Reference Number: 1110082347544291
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. --- Incident description: This company used my photo from my private facebook account. This site allows people to rate you as being a jerk or not. After googling this, I found out that others are experiencing the same issue. If you go to their site, in order to contact them to have you removed, they are charging you a \$25 fee. I am in Law Enforcement and can not have my picture up. Chat rooms on this subject informed me that they are based out of the country. No contact info for them is available.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 10/8/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 10/8/2011	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: SEWELL	State: New Jersey
Zip: 08080	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 30 - 39
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	

City: Huntington Beach	State/Prov: California
ZIP:	Country: United States
Email:	URL: http://jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0607

MARKED CONFIDENTIAL

Record # 65 / Consumer Sentinel Network Complaints	
Reference Number: 36103581	Originator Reference Number: 02510008962049
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: This Web Site Stolen Peoples information from Facebook, And Put jerk.com and After If you want to remove your information from jerk.com they want money. We Need Urgent HelpWe need remove folowing profile urgent http://www.jerk.com/profile.php?id=[REDACTED] Regards [REDACTED] Attny at Law — Additional Comments: We Need Profile remove from internethttp://www.jerk.com/profile.php?id=[REDACTED]	
Data Reference:	
Entered By: BBBDEL-USER	Entry Date: 3/19/2012
Updated By:	Updated Date:
Complaint Source: BBB DE Wilmington	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 3/19/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: ISTANBUL	State: Location Not Reported
Zip: 34912	Country: LOCATION NOT REPORTED
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy.	
City: Lewes	State/Prov: Delaware
ZIP: 19958	Country: United States
Email:	URL: http://www.jerk.com
Area Code:	Phone Number:
Ext:	Title:
Representative Name:	

Record # 66 / Consumer Sentinel Network Complaints	
Reference Number: 35556063	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: I found a profile under my name on this site, though I have never had contact with them. The nature of the site must be cyberbullying. Firstly they offer no possibility of removing the profile, and in order to even contact them they demand a payment of \$25 (which I didnt pay). They are also asking other users to buy and sell personal information about me. This is the content under my name on the profile page. "Nominate this person for Jerk of the day" age: buy sell address: buy sell city: buy sell zip code: buy sell country: buy sell mobile: buy sell msn: buy sell email: buy sell occupation: buy sell employer: buy sell home phone: buy sell work phone: buy sell licence plate: buy sell facebook: buy sell myspace: buy sell ebay: buy sell linked in: buy sell Naturally I am terrified, not only is my personal information open for public auction, but I am branded as a Jerk and have no way to contact them or find who posted this profile fraudulently. I dont think sites like this should be permitted to encourage not only cyber bullying but also identity theft. Please help me. I have to remove my name from this site somehow, and also wish to find out who did this as I feel very nervous now that someone has done this to me intentionally. Unfortunately the company has nearly no information on their site as to how to contact them. Thank you for any help in advance [REDACTED]	
Data	
Reference:	Entry Date: 3/16/2012
Entered By: FTCCIS-FTCUSER	Updated Date:
Updated By:	Product Service Code: Internet Information & Adult Services
Complaint Source: FTC Online Complaint Assistant (CIS)	Amount Paid: \$0.00
Amount: \$25.00	
Requested:	Agency Contact: Internet
Payment Method:	Transaction Date:
Complaint Date: 3/1/2012	Initial Response:
Initial Contact: Internet (Other)	Law Violation: Company does not provide any opportunity for consumer to opt out of information sharing
Statute/Rule: General Privacy	Dispute with Credit Bureau?:
Topic:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Dispute with Credit Bureau - Responded?:	
Member of armed forces or dependent?: No	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1:	Address 2:
City:	State:
Zip:	Country: UNITED KINGDOM
Home Number:	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	
Address: 16192 Coastal Hwy. Lewes, DE 19958	
City:	State/Prov:
ZIP:	Country: United States

CX0608

MARKED CONFIDENTIAL

Record # 151 / Consumer Sentinel Network Complaints	
Reference Number: 35150979	Originator Reference Number: 1201082022041451
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: This website, without my permission, created a profile containing personal information and stolen pictures from my Facebook account.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 1/8/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Unsolicited Email
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 1/8/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address: [REDACTED]	Address 2:
City: PITTSBURGH	State: Pennsylvania
Zip: 15215	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: http://www.jerk.com/
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0610

MARKED CONFIDENTIAL

Record # 68 / Consumer Sentinel Network Complaints	
Reference Number: 39155769	Originator Reference Number: 11760098702544
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Content was posted about me and my wife that is slanderous and defamatory. Posted on quo [REDACTED] and quo [REDACTED] -- Additional Comments: I would like the pages removed without cost to me. I would also like to know who posted these pages so I can report them to the proper legal authorities.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 7/10/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 7/10/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: INDEPENDENCE	State: Kentucky
Zip: 41051	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0611

MARKED CONFIDENTIAL

Record # 163 / Consumer Sentinel Network Complaints	
Reference Number: 36618409	Originator Reference Number: 11760098679178
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I see that a picture of me that I had on facebook several months ago is on this website with my name. I want it removed. -- Additional Comments: Remove my name and picture and any other information about me from their website.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 3/21/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 3/21/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: RIXEYVILLE	State: Virginia
Zip: 22737	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0612

MARKED CONFIDENTIAL

Record # 48 / Consumer Sentinel Network Complaints	
Reference Number: 39562101	Originator Reference Number: 11760098709700
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: Jerk.com stole my picture from my facebook account and posted it on their site without my permission. --- Additional Comments: Remove my profile from the website.'	
Data	
Entered By: BBBCOCA-USER	Entry Date: 8/3/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 8/3/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: MIDDLETOWN	State: Ohio
Zip: 45044	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com
Area Code: 781	Phone Number: 9253373

Ext:	
Representative Name:	Title:

CX0613

MARKED CONFIDENTIAL

Record # 199 / Consumer Sentinel Network Complaints	
Reference Number: 33146342	Originator Reference Number: 02410008734764
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: I have never signed up at this website and have no idea how they received a picture of me to put on the website jerk.com. The website rates whether I am a jerk or not and comes up among the first couple of websites when my name is searched. I would like the company to remove it immediately. — Additional Comments: I would like jerk.com to remove my name from their website and remove my picture immediately. Thank you.'	
Data Reference:	
Entered By: BBBDC-USER	Entry Date: 10/17/2011
Updated By:	Updated Date:
Complaint Source: BBB DC Washington	Product Service Code: Social Networking Service
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 10/17/2011	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address [REDACTED]	Address 2:
City: GLENDALE	State: New York
Zip: 11385	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 1220 Blair Mill Road	
City: Silver Spring	State/Prov: Maryland
ZIP: 20910	Country: United States
Email:	URL:
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0614

MARKED CONFIDENTIAL

Record # 160 / Consumer Sentinel Network Complaints	
Reference Number: 34312026	Originator Reference Number: 1112311409181741
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "Record Details page - Data Reference field" on the Consumer Sentinel Network page for further details on IC3 data. --- Incident description: I conducted a Google search on myself on December 31, 2011 to ensure that no inappropriate or expired information about myself was in existence on the Internet. The eighth listing down was www.jerk.com/profile.php? [REDACTED] it is a profile that includes my full name and photo on the website jerk.com. I have never authorized use of my name or photo for this particular website. I did post the photo to a Facebook account approximately 2-3 years ago, but I did not give up my rights to the photo nor allow others to use it without my prior approval. As of December 31, 2011, there is no way to remove my profile. The website claims the following: " Just because you have a profile on Jerk does not mean you are a jerk. Less than 5% of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk, is not a jerk, or is a saint in the eyes of others. No one's profile is ever removed because Jerk is based on searching free open internet searching databases and it's not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php" The website states that if you contact them via the website, they will charge a \$25 fee. They also state that photos cannot be removed unless you sign up for an account that both costs money and requires that you give personal information to the company. I would like to see that my entire profile is removed, or, at the very least, that my copyrighted photo is removed, from the website. As many others also feel victimized by this website (see below), it would be great to have it taken down.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 12/31/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 12/31/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: SAINT LOUIS	State: Missouri
Zip: 63109	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk Lic		
Address: 16192 Coastal Hwy.		
City: Lewes	State/Prov: Delaware	
ZIP: 19958	Country: United States	
Email:	URL: http://www.jerk.com	
Area Code:	Phone Number:	
Ext:		
Representative Name:	Title:	

CX0615

MARKED CONFIDENTIAL

Record # 47 / Consumer Sentinel Network Complaints	
Reference Number: 39890297	Originator Reference Number: 11208050433168182
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. -- Incident description: The website jerk.com took an image from my Facebook account and posted it on their website, creating a fake profile for me. This has jepordized my school, work, and I have seen several psychologists over this.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 8/5/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Unsolicited Email
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 8/5/2012	Transaction Date:
Initial Contact: Unknown	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: SAN ANTONIO	State: Texas
Zip: 78244	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com Llc	
Address: 1425 marine drive	
City:	State/Prov:
ZIP:	Country: Canada

Email:	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0616

MARKED CONFIDENTIAL

Record # 241 / Consumer Sentinel Network Complaints	
Reference Number:	34563369
Language:	English
Source:	Consumer
Originator Reference Number:	
Contact Type:	Complaint
DNC?	N
Comments:	<p>Louie Lardas of www.jerk.com has been blackmailing people with the pictures he stole from social media sites and charging them VIA paypal an ebay company who knew well about this 99. or more to get a good rating recurring a year to redirect their stolen pictures when they owned them. The DMCA protected them and he knew that he had a whole office dedicated to that. You may see all the photographs taken before he took down jerk.com that I have saved. Here http:ireport.cnn.comdocs [REDACTED] http:ireport.cnn.comdocs [REDACTED] this last link is a screenshot of a stolen newborn dubbed a jerk. When I contacted abuse their response was "abuse@netriplex.com to me, "Hello Mr. [REDACTED]. I see the screenshot you are referring to, but as I am not child services, I may not speak on their behalf as to whether or not the image is abusive and/or illegal." as well as CC: to [REDACTED] Attorney JS@sleibilawfirm.com http:ireport.cnn.comdocs [REDACTED] It is sick that NO ONE not even abuse at the company polices a newborn being called a jerk as well as her first picture being stolen and posted on a terrible site that will only remove it for bribery. EBAY and PAYPAL take a cut of this bribery and have been contacted and do not stop. The screen shots show its 99. a year to forward your picture when you own the picture, pure bribery. They have a DMCA office set up to process those complaints as they stole the pictures and if people go that route they will remove it. They also have underage children on there, well under 12 peoples daughters who will come forth and have asked them to remove them, myself and [REDACTED] are the main complainants right now as DMCA reports were sent in and never confirmed and police reports were filed because threats were made because we were on this site with pictures we never put on there and never wanted on there. Slanderous and cruel things were said and threats were made on my life. My address was for sale for a paypal fee. It is truly disgusting and if I didnt buy it to remove it, someone could murder me. This person has no conscience. Ebay and paypal keep ignoring the complaints and are just as guilty. This site may be down but the mental damage it left from threats and working up a pregnant woman is unbelievable. I was mugged two years ago. I didnt want to leave my apartment, thanks to the threats. I was told to pay to remove them. Bribery. Pure Bribery [REDACTED] already has high blood pressure and he was causing her medical problems with the stress of mocking her publicly with her own pictures he stole without permission. Please CC as a victim (complainant) : [REDACTED] Stow, OH 44124. PS9000: Bribery Other-Other Update</p>
Data Reference:	
Entered By:	FTCCIS-FTCUSER
Updated By:	CRSS\tiacobucci
Complaint Source:	FTC Online Complaint Assistant (CIS)
Amount Requested:	\$99.00
Amount Paid:	\$0.00
Payment Method:	Not Reported
Agency Contact:	Internet
Complaint Date:	1/20/2012
Transaction Date:	1/19/2012
Initial Contact:	Internet Web Site
Response:	Internet/E-mail
Statute/Rule:	FTC Act Sec 5 (BC)
Law Violation:	Deception/Misrepresentation
Topic:	
Dispute with Credit Bureau - Resolved?:	
Dispute with Credit Bureau - Resolved to Satisfaction?:	
Member of armed forces or dependent?:	No
Consumer Information	
Consumer	

Complaining Company/Org:			
First Name: [REDACTED]		Last Name: [REDACTED]	
Address 1: [REDACTED]		Address 2: [REDACTED]	
City: Mayfield Heights		State: Ohio	
Zip: 44124		Country: UNITED STATES	
Home Number: [REDACTED]		Work Number: [REDACTED]	
Fax Number:		Ext:	
Email: [REDACTED]		Age Range:	
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject: Jerk.com Louis A Lardas Lardas Systems Inc Immedion			
Address: 5500 Bolsa Ave 245			
City: Huntington Beach		State/Prov: California	
ZIP: 92648-5199		Country: United States	
Email: abuse@netriplex.com		URL: http://www.jerk.com/	
Area Code: 714		Phone Number: 8412250	
Ext:			
Representative Name: abuse@netriplex.com abuse@netriplex.com		Title: abuse@netriplex.com	

CX0617

MARKED CONFIDENTIAL

Record # 16 / Consumer Sentinel Network Complaints	
Reference Number: 40250190	Originator Reference Number: 11208281636430891
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: I am a Phd in Education and from time to time I Google myself to see what is out there on me to protect my profile and I saw a listing titled: "Is [REDACTED] a Jerk?" Curious, I clicked on it and unfortunately a picture of my daughter, when she was about 6 months old, came up as my profile picture. This picture was obviously taken from Facebook even though I have very strict privacy settings on FB. On Jerk.com there is a tab titled "remove me" so I clicked on that and it had an explanation that "less than 5% of people on Jerk.com are actually jerks and . . . you can't remove anything from the internet." So I attempted to contact the web administrator to see if they would take down the pictures of my daughter - on the contact us page you could file feedback or a complaint but the page said that if I was not a registered user of jerk.com I had to give my credit card information and I would be charged \$25 to file the complaint. I think this is an abusive site and dangerous for children if they are going to take child profile pictures from FB and post them. I want my profile taken off of Jerk.com and I think their business practices should be investigated. Thank you. [REDACTED] PhD --- Specified Other Payment: I didn't go so far as to pay	
Data Reference:	More Information on Data Contributor Complaints?
Entered By: IC3-USER	Entry Date: 8/28/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$0.00
Payment Method: Other Payment Method (Note in Comments)	Agency Contact: External Agency
Complaint Date: 8/28/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: WOODBRIDGE	State: Virginia
Zip: 22191	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 40 - 49

Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com Googleads	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL:
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0618

MARKED CONFIDENTIAL

Record # 249 / Consumer Sentinel Network Complaints	
Reference Number: 36613486	Originator Reference Number: 11760098662542
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: My photo was taken from facebook and an account was created with my name. I did not give permission for any of this to take place, it is illegal, -- Additional Comments: Remove my photo and profile immediately. This website is encouraging cyber bullying and is unethical and immoral. It should be shut down completely and invades the privacy of others. Strangers should also not be allowed to create profiles for other people. This is a form of abuse and it is a complete monstrosity to have a website that promotes this type of behavior. It is degrading, robs people of their self esteem and makes you feel threatened and unsafe. REMOVE MY PROFILE NOW.'	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 1/10/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 1/10/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: ASTORIA	State: New York
Zip: 11102	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email:	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	

City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com
Area Code: 781	Phone Number: 9253373
Ext:	
Representative Name:	Title:

CX0619

MARKED CONFIDENTIAL

Record # 90 / Consumer Sentinel Network Complaints	
Reference Number: 38019867	Originator Reference Number: 1205301004166731
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: My name and picture were taken, evidently from my Facebook profile which has been set to private, without my permission. Jerk.com place has taken my name and photo and placed it on their website which elicits people on the internet to bully random people or people they know. I found out that I was listed on Jerk.com when I googled my name and my profile on the site was one of the first hits. I want to be removed from the site, but have no way of doing so or asking for the webmaster to do so because the website charges \$25 for claiming a profile, which doesn't guarantee I can remove my name and photo, as well as for contacting the site. I never gave this site or anyone else permission to use my name and picture. I want to be completely removed from the site.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 5/30/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 5/30/2012	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: RICHMOND	State: Virginia
Zip: 23238	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	

Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL:
Area Code: 800	Phone Number: 9696155
Ext:	
Representative Name: unknown unknow	Title:

CX0620

MARKED CONFIDENTIAL

Record # 219 / Consumer Sentinel Network Complaints	
Reference Number: 32018932	Originator Reference Number: 1108072301379611
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: My name and personal photo, stolen from my private Facebook.com account has been copied and used on this website without my permission. The website is a debauchery of my name, and after multiple tries, I have found that the website denies one access to remove their "profile" UNLESS you sign up and pay the registration fee.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 8/7/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 8/7/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule Topic:	Law Violation:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: QUEENS	State: New York
Zip: 11439	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 18 - 19
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.be	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL:
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0622

MARKED CONFIDENTIAL

Record # 309 / Consumer Sentinel Network Complaints	
Reference Number: 33041343	Originator Reference Number: 1110010345518541
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. — Incident description: Dear Ladys & Gentlemen, I was searching over google my name to see whats happen then. Ive found this account with my name and picture, which is theft from facebook. Ive never creating this account on this homepage. Ive writing to the support of jerk.com, but didnt get any answer. There is a button to remove the profile, but you have to pay 99 USD/year. How could it be, that somebody is using legal my Name & Picture. Please help me in this case. I dont want a profile on this page or that somebody is using my data. Thank you in advance. Regards [REDACTED] Specified Other Payment: Paypal	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 10/1/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 10/1/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: BRETTEN	State:
Zip: 75015	Country: GERMANY
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk Llc	

Address: n.a.		
City: Eakly	State/Prov: Oklahoma	
ZIP: 73033	Country: United States	
Email: support@jerk.com	URL: www.jerk.com; www.jerk.be	
Area Code: [REDACTED]	Phone Number: [REDACTED]	
Ext:		
Representative Name: n.a. n.a.	Title:	

CX0623

MARKED CONFIDENTIAL

Record # 13 / Consumer Sentinel Network Complaints	
Reference Number: 40222916	Originator Reference Number: 11208300904043451
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: I was informed of this website and that I was there. On looking at it I found to remove yourself that you had to pay a sum of money. I chose not to do that as on searching online revealed that this site would take money and not remove the offending page. I would like this page to be remove as it is defamatory and vilifying of myself and yet I can't defend myself from the poor comments made. I noted online the many complaints that photos are taken from their Facebook page which is private. Therefore is it Facebook themselves a rogue employee stealing peoples information and charging money to remove details? Is it a rogue application that is stealing photos? This website needs to come down and quick. It claims that it must be dealt with Arizona so I hope something can be done. --- Specified Other Payment: [REDACTED] password [REDACTED] My friend accidentally claimed it as hers and she has provided me with the password she created. [REDACTED] nformed me of the following: "as i was looking through it it had a button to say claim this site..... stupid me clicked it and now it wants \$90 from me to forward the page elsewhere." Therefore this is a scam at a higher \$\$\$ level than what I previously stated. I shouldn't have to pay \$90 to remove the vile information and photo of myself.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 8/30/2012
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid: \$25.00
Payment Method: Other Payment Method (Note in Comments)	Agency Contact: External Agency
Complaint Date: 8/30/2012	Transaction Date:
Initial Contact: Unknown	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: VIRGINIA	State:
Zip: 5120	Country: AUSTRALIA
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 40 - 49

Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Wwww.jerk.com	
Address:	
City:	State/Prov:
ZIP:	Country:
Email:	URL: http://www.jerk.com/ [REDACTED]
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0624

MARKED CONFIDENTIAL

Record # 190 / Consumer Sentinel Network Complaints	
Reference Number: 33277916	Originator Reference Number: 1110271934544002
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "More Information on Data Contributor Complaints" link for further details on IC3 data. --- Incident description: When initiating a google.com search of [REDACTED] I came upon a web-site (www.Jerk.com) which has used my name and an nonpublic picture of my boyfriend and I without my permission. In an attempt to remedy the problem I navigated to the link "Remove" where I came upon this disclaimer: "Just because you have a profile on Jerk does not mean you are a jerk. Less than 5% of the millions of people on Jerk are jerks. Jerk is where you find out if someone is a jerk, is not a jerk, or is a saint in the eyes of others. No one's profile is ever removed because Jerk is based on searching free open internet searching databases and it's not possible to remove things from the Internet. You can however use Jerk to manage your reputation and resolve disputes with people who you are in conflict with. There are also additional paid premium features that are available http://www.jerk.com/signin.php" By using my personal photo which is actually NOT visible in any public search query, the web-site is guilty of copyright infringement. By linking my name on a forum such as jerk.com which insights use of hateful language, I believe the web-site to also guilty of defamation of character. All I ask is that my name and profile be removed.	
Data Reference: More Information on Data Contributor Complaints?	
Entered By: IC3-USER	Entry Date: 10/27/2011
Updated By:	Updated Date:
Complaint Source: Internet Crime Complaint Center	Product Service Code: Internet Information & Adult Services
Amount Requested:	Amount Paid: \$0.00
Payment Method: Not Reported	Agency Contact: External Agency
Complaint Date: 10/27/2011	Transaction Date:
Initial Contact: Internet Web Site	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: NORTHVALE	State: New Jersey
Zip: 07647	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 20 - 29
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Wwv jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States

Email:	URL: www.jerk.com/profile.php?id=34899
Area Code: 800	Phone Number: 9696155
Ext:	
Representative Name:	Title:

CX0626

MARKED CONFIDENTIAL

Record # 141 / Consumer Sentinel Network Complaints	
Reference Number: 36261688	Originator Reference Number:
Language: English	Contact Type: Complaint
Source: Consumer	DNC? N
Comments: I googled my name just to check and see if there was anything I should know about out on the internet. I do not know how long this site has been up as I havent googled my name in a while. My name showed up on something called Jerk . Am I a jerk or not? People can vote. No one had voted on my name. I did read some other comments from people about how they had been voted on and were a certain percentage a jerk . I went into the site which contained information from my facebook account. There was a choice to have my name removed from this website, so I checked it. I had to put in my name and email address and then it said that it would remove me if I bought one of the three conflict resolution courses or information available. It would cost me \$90.00. As far as I am concerned this is a form of bullying or extortion. I do not believe that I should have to pay to have my name removed from an offensive website. I do believe that voting people as jerks is offensive. I tried to contact Google, but since this problem does not fall into any of their categories, I was unable to contact them. I tried Facebook, which also uses categories, and not one of them related to this problem. I could not find a fitting contact for either Google or Facebook. I am not sure how this Jerk website got my information, but it was information from my facebook account. I will continue to try to contact Google and Facebook and find addresses for them and send them a written letter. Thank you very much for looking into this. You may want to check www.jerk.com and see if you are there. Thanks again [REDACTED]	
Data Reference:	
Entered By: FTCCIS-FTCUSER	Entry Date: 4/7/2012
Updated By:	Updated Date:
Complaint Source: FTC Online Complaint Assistant (CIS)	Product Service Code: Internet Information & Adult Services
Amount Requested: \$90.00	Amount Paid: \$0.00
Payment Method:	Agency Contact: Internet
Complaint Date: 4/7/2012	Transaction Date: 3/31/2012
Initial Contact: Internet Web Site	Initial Response: Other
Statute/Rule: FTC Act Sec 5 (BCP)	Law Violation: Deception/Misrepresentation
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of No armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: Salter Path	State: North Carolina
Zip: 28575	Country: UNITED STATES
Home Number: [REDACTED]	Work Number:
Fax Number:	Ext:
Email: [REDACTED]	Age Range: 65 - 69

Military Service Branch:	Soldier Status:
Soldier Station:	Subject
Subject: Jerk	
Address:	
City:	State/Prov:
ZIP:	Country: United States
Email:	URL: www.jerk.com
Area Code:	Phone Number:
Ext:	
Representative Name:	Title:

CX0627

MARKED CONFIDENTIAL

Record # 73 / Consumer Sentinel Network Complaints	
Reference Number: 39033723	Originator Reference Number: 11760098700845
Language: English	Contact Type: Complaint
Source: Organization	DNC? N
Comments: This web site has a picture of my minor 13yea old daughter.I have dealt with a stalker and do not want him googling my name and getting a pic of her. --- Additional Comments: I would like them to take my daughters picture off. '	
Data Reference:	
Entered By: BBBCOCA-USER	Entry Date: 6/28/2012
Updated By:	Updated Date:
Complaint Source: BBB CA Colton	Product Service Code: Other (Note in Comments)
Amount Requested:	Amount Paid:
Payment Method:	Agency Contact: External Agency
Complaint Date: 6/28/2012	Transaction Date:
Initial Contact:	Initial Response:
Statute/Rule:	Law Violation:
Topic:	Dispute with Credit Bureau?:
Dispute with Credit Bureau - Responded?:	Dispute with Credit Bureau - Resolved to Satisfaction?:
Member of armed forces or dependent?:	
Consumer Information	
Consumer	
Complaining Company/Org:	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2:
City: LOXAHATCHEE	State: Florida
Zip: 33470	Country: UNITED STATES
Home Number:	Work Number: [REDACTED]
Fax Number:	Ext:
Email: [REDACTED]	Age Range:
Military Service Branch:	Soldier Status:
Soldier Station:	
Subject	
Subject: Jerk.com	
Address: 419 Main Street #277	
City: Huntington Beach	State/Prov: California
ZIP: 92648	Country: United States
Email:	URL: http://www.jerk.com

Area Code: [REDACTED]	Phone Number: [REDACTED]
Ext:	
Representative Name:	Title:

CX0735

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0738

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0745

MARKED CONFIDENTIAL

From: [REDACTED]
To: support@jerk.com; info@jerk.com
Cc: [Maria Crimi Speth](#)
Subject: USER PROFILE REMOVAL- TERMS OF SERVICE VIOLATION<http://www.jerk.com> [REDACTED]
Date: Friday, November 16, 2012 2:00:44 PM

This notice is to inform you that the terms and conditions of service of your site, [http:// www.jerk.com](http://www.jerk.com) have been violated. The user profile below is for someone under age (13 years old). Please remove this profile within 7 days or further action will be initiated.

<http://www.jerk.com> [REDACTED] [REDACTED].

CX0746

MARKED CONFIDENTIAL

From: [Campbell, Christiane](#)
To: [Maria Crimi Speth](#)
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Date: Friday, November 23, 2012 6:51:47 AM
Attachments: [image001.jpg](#)
Importance: High

Dear Maria:

Thank you for your help thus far, with respect to the Jerk.com postings about our client and its employees.

There are some outstanding questions and issues we'd like to discuss with you, and counsel for the account holder of the posts in question (he has agreed to ma call).

Are you available today (Friday Nov. 23) for a call with us and account-holder's counsel? If so, please propose some times, or let us know what times you are not available. If today does not work for you, please let us know when you might be available on Monday (Nov. 26).

Thank you in advance.

Christiane Campbell

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Friday, October 12, 2012 4:48 PM
To: Campbell, Christiane; 'support@jerk.com'
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

Ms. Campbell:

I handle the legal issues, not the policy issues. You may use the support function of the website for the inquiry you are making.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

JERK 00225
CX0746-001

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com <<http://www.jaburgwilk.com/>>

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From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
Sent: Friday, October 12, 2012 1:14 PM
To: Maria Crimi Speth; 'support@jerk.com'
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Dear Maria:

Thank you for your e-mail below. I've been unsuccessful reaching you by telephone, but I understand you must be inundated. I am following up in writing because this is an extremely important and time-sensitive issue for our client, [REDACTED].

While we recognize and appreciate that the Communications Decency Act (specifically, 47 U.S.C. §230, the "Act") protects your client from the status of "publisher" or "speaker" of offensive Internet posts on its site, we also point out that the very aim of the Good Samaritan clauses of the Act is to facilitate (and shield from liability for) the good faith removal of user-generated content that may be considered obscene, lewd, filthy, harassing, or otherwise objectionable, whether or not such material is constitutionally protected. Under the Act, your client also would not be civilly liable for taking action to enable or make available to

information content providers or others the technical means to restrict access the objectionable material.

Importantly, it appears your client's own Terms & Conditions contemplate the Act. Specifically, Paragraph 2 states: [Account holder] will NOT post on jerk.com any defamatory, inaccurate, abusive, obscene, profane, offensive, threatening, harassing ... material ..." The Terms & Conditions also call for termination of the account holder's account.

JERK 00226
CX0746-002

This letter is not intended as a threat to Jerk, by legal action or otherwise. We are merely requesting that your client adhere to its own Terms & Conditions and act in a manner consistent with the spirit of the Act under which it claims immunity. We repeat our request that the offending account be terminated, and the account holder information released to [REDACTED]. We further request that the offending posts be made invisible.

Please contact me at your earliest convenience with any questions you might have. Otherwise, I look forward to hearing from you with information and confirmation of action taken in response to the above requests.

Thank you,

Christiane Campbell

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Wednesday, October 10, 2012 5:30 PM
To: Campbell, Christiane; 'support@jerk.com'
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

Ms. Campbell:

The photograph will be removed pursuant to the DMCA. The remaining materials are user generated content and Jerk.com is protected from liability under the Communications Decency Act.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com <<http://www.jaburgwilk.com/>>

This communication is intended only for the individual or entity to whom it is directed. It may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. Dissemination, distribution, or copying of this communication by anyone other than the intended

JERK 00227
CX0746-003

recipient, or a duly designated employee or agent of such recipient, is prohibited. If you have received this communication in error, please notify us immediately by telephone at (602) 248-1000, or via e-mail, and delete this message and all attachments thereto.

From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
Sent: Friday, October 05, 2012 4:42 PM
To: 'support@jerk.com'
Cc: [REDACTED]
Subject: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Dear Sir or Madam:

Please see the attached letter and its attachments. A certified copy of the same will follow. The letter is dated today, October 5, 2012. Note that your written response is requested by October 12, 2012. You may respond by letter or e-mail.

We look forward to hearing from you, in writing, no later than October 12, 2012.

<<http://www.duanemorris.com/>>

www.duanemorris.com <<http://www.duanemorris.com/>>

Christiane (Christi) Campbell
Associate

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196

P: 215.979.1817
F: 215.689.4910
C: [REDACTED]

JERK 00228
CX0746-004

E-MAIL <<mailto:ccampbell@duanemorris.com>> | BIO
<<http://duanemorris.com/attorneys/christianeschuman.html>> | VCARD
<<http://www.duanemorris.com/attorneys/vCard/5598.vcf>>

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

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CX0747

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:maria.crimi.speth@jaburgwilk.com)
Subject: Re: USER [REDACTED] REMOVAL - TERMS OF SERVICE VIOLATION
Date: Monday, November 26, 2012 3:27:00 PM

Thank you for getting back at me regarding this request. I already checked your site and find ways to request for removal of post, however there is a charge that I should pay. I would like to know if there are other ways to remove my husband's profile other than paying?

I hope to hear from you soon.

Thank you.

From: Maria Crimi Speth <mcs@jaburgwilk.com>
To: [REDACTED]
Sent: Tuesday, November 27, 2012 2:49 AM
Subject: Re: USER [REDACTED] REMOVAL - TERMS OF SERVICE VIOLATION

Requests such as these must be made directly through the support feature of the website. I only address legal issues.

Sent from my iPad
Maria Crimi Speth
(602) 248-1089

On Nov 24, 2012, at 6:12 AM, [REDACTED] >> wrote:

Good day,

I am writing this email to ask from your kind office to please REMOVE [REDACTED] in your website www.jerk.com<<http://www.jerk.com/>>

He is a victim of harassment and cyberbullying. He is a good man and a good husband to me. I know that there are people out there trying to destroy our marriage and that they tried to humiliate my husband through your website.

I've been having sleepless nights since the day I saw his profile in your website and I keep on crying on why there are people who never stop torturing me. My family and my husband's family are very affected. They want to know who is the person responsible for this post. I don't want to reach this issue in court and I hope you can help us regarding this matter.

I am pleading from your kind heart to hear me.

Thank you.

JERK 00232

CX0747

CX0748

MARKED CONFIDENTIAL

From: [Joseph C. Gioconda](#)
To: [Maria Crimi Speth](#)
Subject: Re: Jerk.com LLC / [REDACTED]
Date: Friday, November 30, 2012 12:40:38 PM
Attachments: [CBA29391-2578-46C0-831B-389C3B07ECF6\[26\].png](#)
[REDACTED] [Letter to Speth .pdf](#)

Ms. Speth:

Please see the attached correspondence and related attachments, also being sent to you, and to Jerk.com LLC by Certified Mail, Return Receipt Requested. Thank you.

Joseph C. Gioconda

Attorney, Counselor at Law and Founder

1 Penn Plaza, 36th Floor
Fashion Avenue & West 34th Street
New York, NY 10119-0002
Tel: 212 786-7549
Fax: 888 697-9665

Bell Plaza, Suite 607
42-40 Bell Boulevard
Bayside, NY 11361
Tel: 718 423-3610

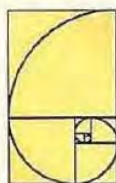
E-Mail: Joseph.Gioconda@GiocondaLaw.com

Website: www.GiocondaLaw.com

Blog: www.GiocondaLaw.BlogSpot.com

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JERK 00233
CX0748-01



GIOCONDA

LAW GROUP PLLC

One Penn Plaza • 36th Floor
 Fashion Avenue & West 34th Street
 New York, NY 10119-0002
 Tel: (212) 786-7549

Bell Plaza • Suite 607
 42-40 Bell Boulevard
 Bayside, NY 11361-2201
 Tel: (718) 423-3610

Fax: (888) 697-9665
 E-Mail: Joseph.Gioconda@GiocondaLaw.com
 Website: www.GiocondaLaw.com

Re: Jerk.com / [REDACTED]

30 November 2012

By E-Mail, w/Attachments
and Certified Mail, Return Receipt Requested, w/Attachments

Ms. Maria Crimi Speth, Esq.
 JABURG & WILK, P.C.
 3200 North Central Avenue
 Suite 2000
 Phoenix, AZ 85012

Ms. Speth:

I am writing to follow up on our telephone conversation of Wednesday, November 28, 2012. It is my understanding that you represent Jerk.com LLC, which you confirmed. As we discussed, my law firm represents [REDACTED]. Under penalty of perjury, I declare by my signature below that I am authorized to speak on [REDACTED] behalf in this matter.

Our client recently discovered that a search for his name in the Google® search engine returns a result that is highly visible in the top two listings which states: "Jerk :: [REDACTED] • is a jerk". See attached Exhibit 1.

When a user then clicks the hyperlink displayed in the Google® search results, he is brought to a profile page on Jerk.com. This profile prominently displayed several images, including the first, third and fourth images, which were images of [REDACTED]. See attached Exhibit 2. The second image displayed was not of [REDACTED].

JERK 00234

CX0748-02

Please be advised that the unauthorized copying and display of the fourth image violates [REDACTED] exclusive rights under the U.S. Copyright Act, 17 U.S.C. § 501 *et seq.*

[REDACTED] does not concede that Jerk.com LLC may avail itself of the safe harbor in Section 512(c) of the Digital Millennium Copyright Act ("DMCA") for several reasons.

First, Jerk.com is not merely an online or Internet "service provider" as defined by the DMCA. It clearly benefits directly and financially from the infringements occurring thereon. *Id.*; see *A&M Records, Inc. v. Napster, Inc.*, 239 F.3d 1004 (9th Cir. 2001) ("drawing" customers to a website to receive a direct financial benefit deprives OSP of safe harbor.)

Second, as discussed further below, it is not clear that the profile of [REDACTED] depicted in Exhibit 1 attached hereto was "user generated content."

However, solely for the purposes of expeditiously resolving this particular matter, please be advised that we possess a good faith belief that Jerk.com's display of the fourth image violates [REDACTED] exclusive rights in that image, and we demand that it be permanently removed.

Without waiving or relinquishing his rights in any way, solely to mitigate the damages caused by the ongoing existence of this profile, [REDACTED] opted to pay Jerk.com to designate this profile as "private" and to forward visitors to an innocuous website.

However, even utilizing this process does not remove the offending profile from continued visibility in search engine results, which continue to prominently display the statement "Jerk :: [REDACTED] • is a jerk" devoid of further context. Consequently, [REDACTED] continues to be harmed by Jerk.com's continued conduct in this regard.

Further, I had inquired during our telephone conversation of yesterday whether [REDACTED] profile and the images displayed constituted "user generated" content, or content unilaterally created by Jerk.com.

The reasons for our client's belief that this profile was *not* user generated are as follows.

First, there is no textual content. One would expect that user generated content would contain critical statements.

Second, the display of the various images in the profile mirrors those of images displayed in the Google[®] image search results, which include photographs that are not of [REDACTED]. See attached Exhibit 1. One would expect that any user generating such content would recognize [REDACTED], and filter such images out. Therefore, this fact strongly suggests that Jerk.com itself created this profile using images that were automatically harvested from Google[®] or other sources for the purpose of generating traffic and soliciting financial payments from targeted individuals.

You stated that you believed that all profiles on Jerk.com are user generated, because you believed that Jerk.com does not have the technical capacity to unilaterally create content. You also stated that you would ask your client about this fact, and confirm it. However, we have not yet received any response from you.

Please be advised that if Jerk.com is unilaterally creating content, it is clearly not provided with any form of immunity under the DMCA, and would be directly liable for, *inter alia*, copyright infringement, as well as for state law violations for misappropriation of likeness and invasion of privacy, as well as casting [REDACTED] in a false light.

Please inform us in writing by no later than **Thursday, December 6, 2012** whether [REDACTED] profile was a "user generated" profile.

This letter does not constitute a complete statement of the facts, law, claims, rights or remedies with respect to this matter, all of which are hereby reserved.

We look forward to your timely response.

Very Truly Yours,
The Gioconda Law Group PLLC



Joseph C. Gioconda
Attorney, Counselor at Law and Founder

cc: DMCA Complaints, Jerk LLC, w/Attachments
(by Certified Mail, Return Receipt Requested)

+You Search Images Maps Play YouTube News Gmail Drive Calendar More -



[Redacted]



Sign in

Web Images Maps Shopping More Search tools

SafeSearch off

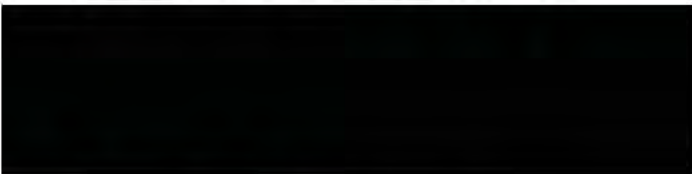


View [Redacted] [Redacted]

[Redacted] - Vestar Capital Partners

www.vestarcapital.com/en/15/

Next << Previous. [Redacted] a Principal at Vestar. Currently, [Redacted] works across a number of industries including media, consumer, ...



Jerk : [Redacted] is a jerk

www.jerk.com [Redacted]-p3758.html

[Redacted] profile. Find out if [Redacted] is a jerk or not!

[Redacted] LinkedIn

www.linkedin.com/in/[Redacted]

View [Redacted] professional profile on LinkedIn. LinkedIn is the world's largest business network, helping professionals like [Redacted] discover ...

[Redacted] - S&P Capital IQ Power Moves

powermoves.capitaliq.com/?a=[Redacted]&22

[Redacted] - Forbes

www.forbes.com/profile/[Redacted]

[Redacted] on Forbes - ... [Redacted]. Follow Following Unfollow. At a Glance. Director, Health Grades, Inc. Profile. In accordance with the Merger ...

3 people named [Redacted] in the US | WhitePages

names.whitepages.com - Name Popularity

Find [Redacted] on WhitePages. There are 3 people named [Redacted] in places like Brooklyn, NY; Melville, NY; and New York, NY.

[Redacted] - New York, NY | MyLife@

www.mylife.com/[Redacted]

Look who we found: [Redacted] 34. View contact info, social networks and photos and stay connected with [Redacted] 34 at MyLife@.

[Redacted] - Advisor at Pfs Investments Inc. - 5080493

financial-advisors.findthebest.com [Redacted] Financial Advisors

[Redacted] - Advisor at Pfs Investments Inc. View assets managed, advisory activities, and more.

[Redacted] on Scribd | Scribd

www.scribd.com/[Redacted]

Scribd is the world's largest social reading and publishing site.

[Redacted] - Email, Address, Phone numbers, everything ...

www.123people.com/s/[Redacted]

Everything you need to know about [Redacted] Email addresses, Phone numbers, Biography, 10167, Gifts, Patent.

[REDACTED] - Google Search

Exhibit 1

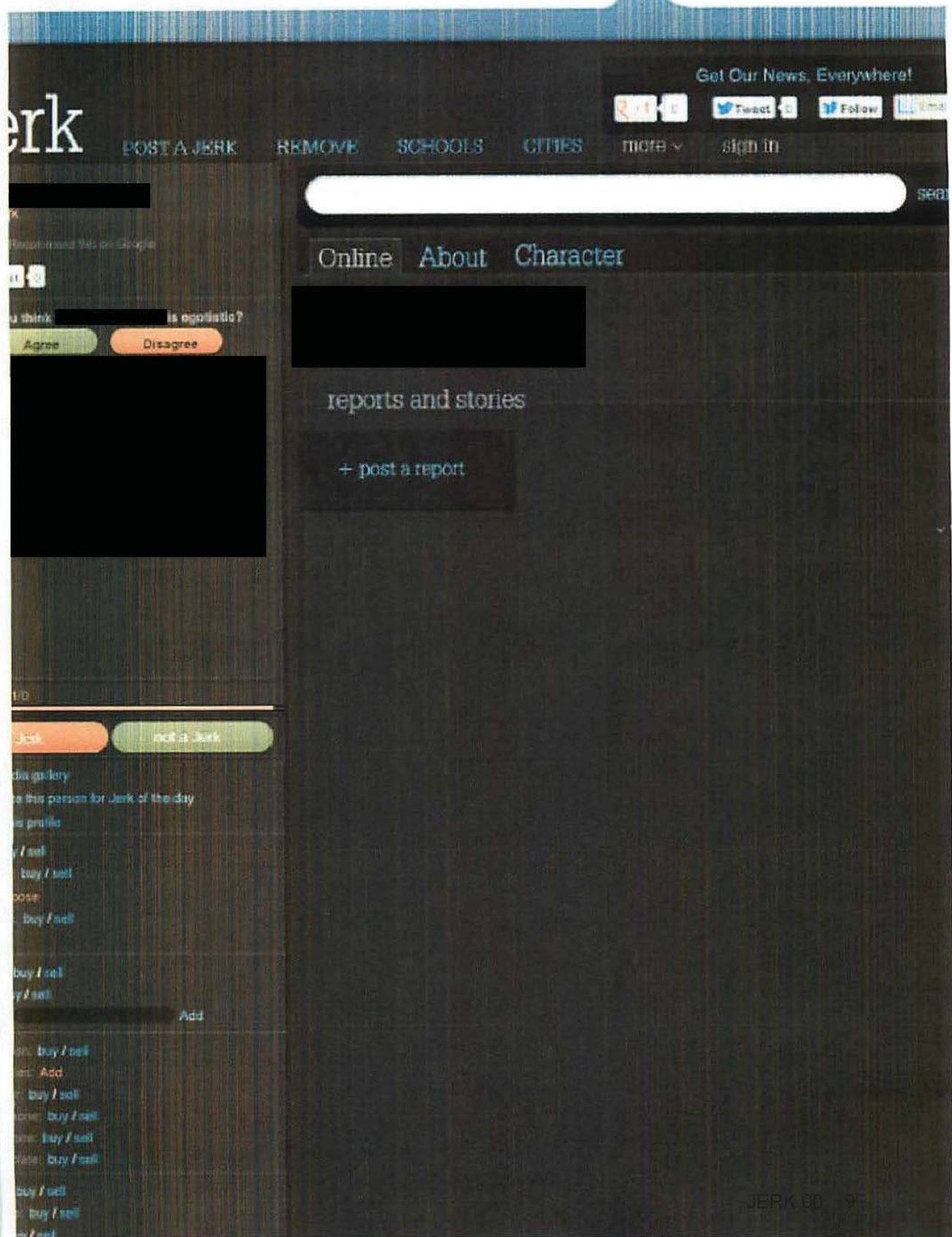
11/30/12 3:11 PM

Searches related to [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]



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[About Google](#)



CX0749

MARKED CONFIDENTIAL

From: [Campbell, Christiane](#)
To: [Maria Crimi Speth](#)
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Date: Friday, December 07, 2012 2:10:47 PM

Maria -

Thanks for getting back to me.

In the interest of full disclosure, what we have is two parties on opposite sides of a dispute, about postings made on Jerk.com. Our client was the subject of the offending posts, the other side was the party posting. The parties are in the process of resolving the issues, but the final piece is the requirement that the other side remove the offending posts. The other side, through its counsel, has agreed to remove the posts, but needs to know from Jerk exactly what steps it can (and must) take to remove them. My understanding is that they've been unsuccessful in getting through to Jerk Support, to get its assistance with take-down (or other remedy).

As I mentioned to you before, I am not the poster - I created an account with Jerk in the effort to dispute or report the posts, but had no luck. I've also e-mailed Jerk Support (they were previously responsive), but... crickets. Surely, it is not the \$25 that is the issue - it is simply our firm policy not to use credit cards for such things. Further - if I or the other side enter credit card or other payment information, we want some assurance that we would be afforded the benefit of Jerk Support's help in removing the posts.

We just want to speak to Jerk Support to determine what steps the parties can take to remove the offending posts, and then have a discussion with counsel for the other side on the line to discuss each needed step. If we have to pay \$25 to speak with Jerk Support about this - or \$90 for a year subscription to deal with this - so be it.

Lawyer-to-lawyer, we are asking that you please facilitate the communication with Jerk Support and let us know what costs are involved.

Christiane

-----Original Message-----

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Friday, December 07, 2012 12:11 AM
To: Campbell, Christiane
Subject: Re: Notification of Violation of Jerk Terms & Conditions and Copyrights

Christi:

I do not understand. What happens when you try to reach support? When you say that you are uncomfortable with entering a credit card and making a payment, do you mean that you haven't done that? My understanding is that support is \$25. So, are you saying that you are willing to charge your client for the time you have taken in these communications and comfortable with me billing my client for my time in this, but not comfortable with paying \$25?

Sent from my iPad
Maria Crimi Speth
(602) 248-1089

On Dec 6, 2012, at 2:54 PM, "Campbell, Christiane"
<ccampbell@duanemorris.com<<mailto:ccampbell@duanemorris.com>>> wrote:

JERK 00246
CX0749-01

Maria -

Per my voice mail of a few moments ago:

Following our discussion last Friday, we've tried repeatedly - without success - to reach Jerk Support, to ask how a subscriber to its site might go about removing or at least hiding certain posts. We are contacting you again because Jerk Support has been unresponsive (and contacting Jerk Support through the Jerk site requires entry of a credit card number and payment, something we are obviously not comfortable with).

We ask that you please forward this on to Jerk and ask that they get in touch with me directly, or please provide me with contact information I can use to reach someone in a position that can assist.

We note that we are working closely with the offending poster, to resolve these issues. They are cooperating but we need Jerk's help to complete the final pieces.

Thank you,
Christi Campbell

From: Campbell, Christiane
Sent: Friday, November 23, 2012 9:52 AM
To: 'Maria Crimi Speth'
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Dear Maria:

Thank you for your help thus far, with respect to the Jerk.com<<http://Jerk.com>> postings about our client and its employees.

There are some outstanding questions and issues we'd like to discuss with you, and counsel for the account holder of the posts in question (he has agreed to ma call).

Are you available today (Friday Nov. 23) for a call with us and account-holder's counsel? If so, please propose some times, or let us know what times you are not available. If today does not work for you, please let us know when you might be available on Monday (Nov. 26).

Thank you in advance.

Christiane Campbell

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Friday, October 12, 2012 4:48 PM
To: Campbell, Christiane; 'support@jerk.com<<mailto:support@jerk.com>>'
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

Ms. Campbell:

I handle the legal issues, not the policy issues. You may use the support function of the website for the inquiry you are making.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

JERK 00247
CX0749-02

www.jaburgwilk.com <<http://www.jaburgwilk.com/>>

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From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
Sent: Friday, October 12, 2012 1:14 PM
To: Maria Crimi Speth; 'support@jerk.com' <<mailto:support@jerk.com>>
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High
Dear Maria:

Thank you for your e-mail below. I've been unsuccessful reaching you by telephone, but I understand you must be inundated. I am following up in writing because this is an extremely important and time-sensitive issue for our client, [REDACTED].

While we recognize and appreciate that the Communications Decency Act (specifically, 47 U.S.C. §230, the "Act") protects your client from the status of "publisher" or "speaker" of offensive Internet posts on its site, we also point out that the very aim of the Good Samaritan clauses of the Act is to facilitate (and shield from liability for) the good faith removal of user-generated content that may be considered obscene, lewd, filthy, harassing, or otherwise objectionable, whether or not such material is constitutionally protected. Under the Act, your client also would not be civilly liable for taking action to enable or make available to information content providers or others the technical means to restrict access the objectionable material.

Importantly, it appears your client's own Terms & Conditions contemplate the Act. Specifically, Paragraph 2 states: [Account holder] will NOT post on jerk.com <<http://jerk.com>> any defamatory, inaccurate, abusive, obscene, profane, offensive, threatening, harassing . material ." The Terms & Conditions also call for termination of the account holder's account.

This letter is not intended as a threat to Jerk, by legal action or otherwise. We are merely requesting that your client adhere to its own Terms & Conditions and act in a manner consistent with the spirit of the Act under which it claims immunity. We repeat our request that the offending account be terminated, and the account holder information released to [REDACTED]. We further request that the offending posts be made invisible.

Please contact me at your earliest convenience with any questions you might have. Otherwise, I look forward to hearing from you with information and confirmation of action taken in response to the above requests.

Thank you,

Christiane Campbell

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Wednesday, October 10, 2012 5:30 PM
To: Campbell, Christiane; 'support@jerk.com' <<mailto:support@jerk.com>>
Cc: [REDACTED]
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

Ms. Campbell:

JERK 00248
CX0749-03

The photograph will be removed pursuant to the DMCA. The remaining materials are user generated content and Jerk.com<<http://Jerk.com>> is protected from liability under the Communications Decency Act.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com<<http://www.jaburgwilk.com/>>

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From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
Sent: Friday, October 05, 2012 4:42 PM
To: 'support@jerk.com<<mailto:support@jerk.com>>'
Cc: [REDACTED]
Subject: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High
Dear Sir or Madam:

Please see the attached letter and its attachments. A certified copy of the same will follow. The letter is dated today, October 5, 2012. Note that your written response is requested by October 12, 2012. You may respond by letter or e-mail.

We look forward to hearing from you, in writing, no later than October 12, 2012.

<image001.jpg><<http://www.duanemorris.com/>>

www.duanemorris.com<<http://www.duanemorris.com/>>

Christiane (Christi) Campbell
Associate

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196

P: 215.979.1817

JERK 00249
CX0749-04

F: 215.689.4910

C: [REDACTED]

E-MAIL <<mailto:ccampbell@duanemorris.com>> |

BIO <<http://duanemorris.com/attorneys/christianeschuman.html>> |

VCARD <<http://www.duanemorris.com/attorneys/vCard/5598.vcf>>

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

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CX0750

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:maria.crimi.speth@jaburgwilk.com)
Subject: RE: Please take my pictures/name off of Jerk.com
Date: Saturday, December 08, 2012 3:57:59 PM

Why isn't there a function to protect people's privacy if they need it is my question then? This is so upsetting my health and safety are in jeopardy at this point in time.

Where, How and Who can I contact to address this issue? This is extremely important and I have tried every address, etc online to let them know this is serious matter and every letter has been returned unopened. I need a way to contact Jerk.com to get this resolved as quickly as possible. I should not have to "pay" them to have my private pictures removed. It should just be done if someone is in need.

As I mentioned before I've already had to cancel my facebook page where they got the original picture from in the first place because of my safety issues.

I would deeply appreciate any help with this matter.

Thank you,

--- On Fri, 12/7/12, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

From: Maria Crimi Speth <mcs@jaburgwilk.com>
Subject: RE: Please take my pictures/name off of Jerk.com
To: [REDACTED]
Date: Friday, December 7, 2012, 10:29 PM

My role is as legal counsel and I only address legal issues, not policy issues. Jerk.com has a paid support function for policy issues such as this.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com <<http://www.jaburgwilk.com/>>

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JERK 00251
CX0750-01

this communication in error, please notify us immediately by telephone at (602) 248-1000, or via e-mail, and delete this message and all attachments thereto.

From: [REDACTED]
Sent: Thursday, December 06, 2012 4:39 PM
To: Maria Crimi Speth
Cc: [REDACTED]
Subject: Please take my pictures/name off of Jerk.com

I have tried repeatedly to contact Jerk.com with NO response whatsoever.

I have written letters, emailed and even tried phone numbers to no avail.

My picture from facebook was taken by Jerk.com about a year and half ago. Now they have somehow taken private, personal family photos and posted them on my name.

My safety is in jeopardy. I have also contacted Google regarding privacy/security.

I would appreciate a response from someone soon and have my name and pictures removed as soon as possible. I do not wish to have to take legal action.

Please contact me as soon as you can.

Most sincerely,

[REDACTED]

CX0751

MARKED CONFIDENTIAL

From: [Campbell, Christiane](#)
To: support@jerk.com; support@jerk.la
Cc: [Maria Crimi Speth](#)
Subject: FW: Notification of Violation of Jerk Terms & Conditions and Copyrights
Date: Monday, December 10, 2012 10:27:21 AM
Importance: High

Jerk Support:

We have made repeated good faith efforts to contact you, via e-mail and the Jerk.com support function. Indeed, we even created an account with Jerk.com, to be afforded the benefit of the "support function," and used the same to request removal of posts made to <http://www.jerk.com/> [REDACTED] [REDACTED]. Despite Jerk's own promises that it will respond to support requests within 24 hours, we've yet to have any success in removing the objectionable posts from the above profile.

We understand that support and a subscription to Jerk.com, to enable us to dispute or report abuse for certain postings, may carry a \$25 and \$30 or \$90 fee, respectively. If this is required, even where we've created a Jerk.com account, please advise. We are willing to pay the support fee or subscription fee if it means we can have the offending post removed once and for all.

If only the post-er can remove the disputed posts, please confirm this and please let us know exactly what steps must be taken for the posts to be removed.

If you prefer to discuss on the phone, please get in touch with me at 215.979.1817.

Christiane Campbell

Christiane (Christi) Campbell
Associate

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: 215.979.1817
F: 215.689.4910
C: [REDACTED]

E-MAIL | BIO | VCARD

-----Original Message-----

JERK 00253
CX0751-01

From: Campbell, Christiane
Sent: Friday, November 30, 2012 5:30 PM
To: 'support@jerk.la'
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Jerk Support:

Thank you for assistance thus far, with respect to the removal of certain posts from Jerk.com, where those posts pertained to our client, [REDACTED], and its executives.

There are additional posts - made by the same account-holder as the previously removed posts - that are of concern to our client, and to the account-holder, who has agreed to take the necessary steps to remove, retract, or make invisible the subject posts. To date, the account-holder has been unsuccessful, despite its apparent efforts.

We'd appreciate the opportunity to discuss with you the steps that the account-holder can take to remedy the situation. We would like to include counsel for the account-holder in the dialogue, at some point. The parties are looking to resolve this matter as quickly and amicably as possible, without resorting to litigation. Your assistance is greatly appreciated.

Please let me know, at your earliest convenience, how we can get in touch and speak with you directly.

Thank you,

Christiane Campbell

-----Original Message-----

From: Support Jerk [<mailto:support@jerk.la>]
Sent: Monday, October 22, 2012 9:16 AM
To: Campbell, Christiane
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Removed.

> Maria:
>
> Since you handle the legal issues, we are contacting you directly to
> demand Jerk's immediate and permanent removal of the photo posted on
> th this
> page: <http://www.jerk.com/> [REDACTED]
> (screen image below). This is a photo of minors (young children).
> The children shown in the photo are those of an employee of our
> client's. We trust you will do the necessary to have this photo
> removed, as a matter of urgency.
>
> [cid:image [REDACTED]]
>
>
> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Friday, October 12, 2012 4:48 PM
> To: Campbell, Christiane; 'support@jerk.com'
> Cc: [REDACTED]
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and
> Copyrights
>
> Ms. Campbell:
>

> I handle the legal issues, not the policy issues. You may use the
> support function of the website for the inquiry you are making.
>
> Maria Crimi Speth, Esq.
> Jaburg & Wilk, P.C.
> 3200 N. Central Ave., Suite 2000
> Phoenix, AZ 85012
>
> 602-248-1089
> 602-248-0522 (fax)
>
> www.jaburgwilk.com< <http://www.jaburgwilk.com/>>
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>
>
>
> _____
> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
> Sent: Friday, October 12, 2012 1:14 PM
> To: Maria Crimi Speth; 'support@jerk.com'
> Cc: [REDACTED]
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and
> Copyrights
> Importance: High
> Dear Maria:
>
> Thank you for your e-mail below. I've been unsuccessful reaching you
> by telephone, but I understand you must be inundated. I am following
> up in writing because this is an extremely important and
> time-sensitive issue for our client, [REDACTED]
>
> While we recognize and appreciate that the Communications Decency Act
> (specifically, 47 U.S.C. §230, the "Act") protects your client from
> the status of "publisher" or "speaker" of offensive Internet posts on
> its site, we also point out that the very aim of the Good Samaritan
> clauses of the Act is to facilitate (and shield from liability for)
> the good faith removal of user-generated content that may be
> considered obscene, lewd, filthy, harassing, or otherwise
> objectionable, whether or not such material is constitutionally
> protected. Under the Act, your client also would not be civilly
> liable for taking action to enable or make available to information
> content providers or others the technical means to restrict access the
> objectionable material.
>
> Importantly, it appears your client's own Terms & Conditions
> contemplate the Act. Specifically, Paragraph 2 states: [Account
> holder] will NOT post on jerk.com any defamatory, inaccurate, abusive,
> obscene, profane, offensive, threatening, harassing ... material ..."
> The Terms & Conditions also call for termination of the account holder's account.
>
> This letter is not intended as a threat to Jerk, by legal action or
> otherwise. We are merely requesting that your client adhere to its
> own Terms & Conditions and act in a manner consistent with the spirit

> of the Act under which it claims immunity. We repeat our request that
> the offending account be terminated, and the account holder
> information released to [REDACTED]. We further request that the
> offending posts be made invisible.

>
> Please contact me at your earliest convenience with any questions you
> might have. Otherwise, I look forward to hearing from you with
> information and confirmation of action taken in response to the above
> requests.

>
> Thank you,

>
> Christiane Campbell

>
>
> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Wednesday, October 10, 2012 5:30 PM
> To: Campbell, Christiane; 'support@jerk.com'
> Cc: [REDACTED]
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and
> Copyrights

>
> Ms. Campbell:

>
> The photograph will be removed pursuant to the DMCA. The remaining
> materials are user generated content and Jerk.com is protected from
> liability under the Communications Decency Act.

>
> Maria Crimi Speth, Esq.
> Jaburg & Wilk, P.C.
> 3200 N. Central Ave., Suite 2000
> Phoenix, AZ 85012

>
> 602-248-1089
> 602-248-0522 (fax)

>
> www.jaburgwilk.com <<http://www.jaburgwilk.com/>>

>
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> telephone at (602) 248-1000, or via e-mail, and delete this message and all attachments thereto.

>
>
> _____

> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
> Sent: Friday, October 05, 2012 4:42 PM
> To: 'support@jerk.com'
> Cc: [REDACTED]
> Subject: Notification of Violation of Jerk Terms & Conditions and
> Copyrights

> Importance: High
> Dear Sir or Madam:

>
> Please see the attached letter and its attachments. A certified copy
> of the same will follow. The letter is dated today, October 5, 2012.

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

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CX0752

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [Debra A. Gower](#)
Subject: please put on letterhead and mail
Date: Wednesday, December 12, 2012 5:45:20 PM

Lisa McLeod-Lofquist
Villaume & Schiek, P.A.
BLN Office Park
2051 Killebrew Dr.
Suite 611
Bloomington, MN 55425

Re: [REDACTED]

Dear Ms. McLeod-Lofquist:

I am in receipt of your letter of November 27, 2012. The content on Jerk.com was posted by a third party user. Your letter threatens legal action against the operators of the website despite the immunity provided by the Communications Decency Act, 47 U.S.C. §230. Claims based upon Minnesota law and privacy rights may be applicable to the user who posted the content, but are completely inapplicable to the operator of the website.

Your letter also seeks disclosure of the user who posted the content. The First Amendment provides a right to anonymous free speech. Pursuant to case law, for example the Mobilisa case in Arizona, the operator of a website need not turn over author information without compliance with the process set forth in Mobilisa.

It may be helpful for you to know that Jerk.com does have a paid online support feature through which your client can request removal.

Maria Crimi Speth, Esq.
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3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
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JERK 00261
CX0752-01

www.jaburgwilk.com <<http://www.jaburgwilk.com>>

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CX0753

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:Maria.Crimi.Speth)
Subject: Re: Jerk.com
Date: Wednesday, December 12, 2012 10:36:53 PM

Please provide me with more information on how to access the online support as there's no online section on you web-page.

2012/12/13 Maria Crimi Speth <mcs@jaburgwilk.com>

Dear [REDACTED]

This is in response to your undated letter to Jerk, LLC which was received in my office on December 6, 2012. Jerk.com has an online support service which is the only procedure to request removal of a post. Please direct your inquiry to that online support.

Maria Crimi Speth, Esq.
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JERK 00263
CX0753

CX0754

MARKED CONFIDENTIAL

From: [REDACTED]
To: [Maria Crimi Speth](mailto:maria.crimi.speth@jaburgwilk.com)
Subject: Re: Jerk.com
Date: Thursday, December 13, 2012 6:57:30 PM

Can you please clarify what do you mean by \$ 25 for service? I don't want any service from the website, I want the profile to be gone. If I opt in and pay the money how will you help me removing it? Will it then not be the case that I cannot close the profile for ever? Please let me know what the process is/

2012/12/14 Maria Crimi Speth <mcs@jaburgwilk.com>

[REDACTED]

Here is all I know. The website assures me that if you pay \$25 for service they are almost always able to help you handle your particular issue. I have not received any complaints from people who have paid for service. There is also a link forwarding feature that costs a little more. If you try the support service and it does not work, let me know and I will take the issue up with my client.

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From: [REDACTED]
Sent: Thursday, December 13, 2012 3:37 PM

To: Maria Crimi Speth
Subject: Re: Jerk.com

JERK 00274
CX0754-01

Hi Maria,

I understand you're very busy and I am sorry to be bothering you again but I really need your help with this issue. I am pretty sure you understand me. This is a very frustrating issue and I want to resolve it as soon as possible. I never created any profiles and I don't accept the fact that my personal details have been used in such a manner against me. I don't own any social pages myself and I don't know how my personal picture ended up online. I really need your help. I have no one else to turn to about this issue. Please do help me with issue.

Thanks

2012/12/13 [REDACTED] >

Excellent! Can you please guide me step by step because I cannot see anything coming up that would suggest a removal of a profile. I understand that you have dealt with similar cases before so please let me know how can I remove it completely. I want to remove my profile. Let the information stay where it stays. Please, Maria, I am being entirely serious. You don't understand how much I want this to go away.

2012/12/13 Maria Crimi Speth <mcs@jaburgwilk.com>

[REDACTED]

You are misconstruing the wording, which probably should be clearer. The statement that it will not be removed is a statement that it will not be removed from the Internet. In other words, even if you removed it from Jerk.com, the source of the information is still on the internet. I was not trying to be cute, it is my understanding that you can request removal through support despite the language that seems to suggest otherwise.

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JERK 00275
CX0754-02

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From: [REDACTED]
Sent: Thursday, December 13, 2012 11:54 AM
To: Maria Crimi Speth
Subject: Re: Jerk.com

Hi Maria,

Thanks for getting back to me but I really don't appreciate your treating me like that. You know very well what's coming up if I click on the tab that you just mentioned. I didn't expect guidance to direct me to this tab to see that my profile cannot be removed. Can you please act accordingly and advise me what should I do? I don't understand under which right you go on and play like that with people's lives. Who gave you the permission to act like these? Please reply accordingly to my email.

2012/12/13 Maria Crimi Speth <mcs@jaburgwilk.com>

Click on the remove tab on the home page.

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From: [REDACTED]
Sent: Wednesday, December 12, 2012 11:37 PM
To: Maria Crimi Speth
Subject: Re: Jerk.com

Please provide me with more information on how to access the online support as there's no online section on you web-page.

JERK 00276
CX0754-03

2012/12/13 Maria Crimi Speth <mcs@jaburgwilk.com>

Dear [REDACTED]

This is in response to your undated letter to Jerk, LLC which was received in my office on December 6, 2012. Jerk.com has an online support service which is the only procedure to request removal of a post. Please direct your inquiry to that online support.

Maria Crimi Speth, Esq.
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JERK 00277
CX0754-04

CX0755

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: ["Rose Keong"](#)
Cc: [Shadi Katirai](#)
Subject: RE: Removal of posting of [REDACTED] on jerk.com
Date: Wednesday, December 19, 2012 9:27:49 PM

Mr. Katirai:

Jerk.com is operated by a U.S. company and is governed by U.S. law. If your client has a valid copyright claim, you may submit a DMCA notice to me and it will be processed pursuant to U.S. law.

Maria Crimi Speth, Esq.
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From: Rose Keong [<mailto:RKeong@sblegal.ca>]
Sent: Tuesday, December 18, 2012 11:28 AM
To: Maria Crimi Speth
Cc: Shadi Katirai
Subject: Removal of posting of [REDACTED] on jerk.com

<<Ltr to M. Crimi Speth Esq. re removal of [REDACTED] on jerk.com Dec 17 12.pdf>>

Dear Ms. Crimi Speth,

Please find enclosed a letter from Shadi Katirai dated December 18, 2012 requiring your immediate attention. Should you have any questions or concerns, please do not hesitate to contact her at her e-mail address given above.

Rose Keong
Assistant to Shadi Katirai

JERK 00285
CX0755-01

Stieber Berlach LLP
Barristers & Solicitors
18th Floor, 130 Adelaide Street West
Toronto, Ontario
M5H 3P5
(416) 366-1400 ext. 2795
rkeong@sblegal.ca
www.sblegal.ca <<file:///\\www.sblegal.ca>>

<<http://sblegal.ca/letterhead/image001.jpg>>

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WARNING: From time to time, our spam scanners eliminate legitimate email from clients. If your email contains important instructions, please ensure that we acknowledge receipt of those instructions.

CX0756

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [REDACTED]
Subject: RE: Jerk.com and [REDACTED] patient
Date: Friday, December 28, 2012 10:26:05 AM

This is the first email that I received from you. I am not the owner of Jerk.com. I am an attorney. I do represent jerk.com but only in legal matters. I have no control or authority that would be of help to you. The website has a paid support function that addresses issues regarding profiles.

Maria Crimi Speth, Esq.
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From: [REDACTED]
Sent: Thursday, December 27, 2012 11:16 PM
To: Maria Crimi Speth
Subject: Jerk.com and [REDACTED] patient

Maria,

I sent you an email yesterday asking if you owned the destructive website www.jerk.com and you refuse to answer.

For your information, you allowed my photo and name to be placed on jerk.com when I did not give any person, nor you, nor your company permission to use my identity.

That photo of me was taken when I was [REDACTED]
[REDACTED] You and your company have also placed a deceased woman's obituary next to my photo. the woman who had the same name as me died of [REDACTED]

JERK 00290
CX0756-01

Now I want you to take my photo and name off your jerk.com website and I want you to tell me who put my photo and name on jerk.com.

Yours sincerely,

A solid black rectangular redaction box covering the signature area.

CX0757

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: ["Campbell, Christiane"](#)
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Date: Friday, January 11, 2013 10:13:54 AM

Christi:

The profile has been removed again. Users are able to repost and may do that. There may be other profiles. Users have in fact made similar profiles under other names. So long as the support payment is up to date your client can email support requesting removal of any additional profiles she discovers. If the support request is not handled to your satisfaction feel free to email me.

Maria Crimi Speth, Esq.
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-----Original Message-----

From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
Sent: Friday, January 11, 2013 10:08 AM
To: Maria Crimi Speth
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Maria:

Your e-mail to me yesterday stated "The profile has been removed." Any reasonable inference that can be drawn from this statement, made by counsel, would lead us - and our client - to believe that [REDACTED] profile and posts located at <http://www.jerk.com/> [REDACTED] (the "Profile") was removed. Based on our prior exchanges, it is also reasonable to infer that the removal was permanent. As mentioned yesterday, the site and the Profile were indeed down for a time (see attached screen images), went back up, and then appeared to be down again. However, I learned late in the afternoon that while the site and Profile were not visible or accessible to me, they were very much live and active for others.

Today, the site and Profile remain up.

What your client apparently views as a game, our client takes very seriously. This is our client's company and reputation. Meanwhile, we see no legitimate benefit to your client in leaving the Profile up. It already received payment from our client seeking support and removal of the Profile, for which our client obviously received no return on its investment.

Understanding that you may not have control over your client, and they may not be forthcoming with you, we will give you and Jerk the courtesy of until close of business (5pm) our local time (Eastern Standard Time) today, January 11, 2013, to communicate and get the Profile permanently removed. If

JERK 00345
CX0757-01

this is not done, we will advise our client to take legal action with no further notice to you.

Christi

-----Original Message-----

From: Campbell, Christiane
Sent: Thursday, January 10, 2013 2:48 PM
To: Maria Crimi Speth
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Maria:

Thank you. About an hour ago, immediately after receiving your e-mail, I checked the site and the disputed profile and posts were down. I checked again just a moment ago, and they are back up. See: <http://www.jerk.com/> [REDACTED] [REDACTED]. As you know, we are seeking permanent removal of the profile and posts.

Thank you,

Christi

-----Original Message-----

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Thursday, January 10, 2013 1:16 PM
To: Campbell, Christiane
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

The profile has been removed.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
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-----Original Message-----

From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
Sent: Tuesday, January 08, 2013 11:08 AM
To: Maria Crimi Speth
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
Importance: High

Maria:

We note, with great appreciation, that as of the end of last week, the photograph of [REDACTED] children was removed or hidden from the Jerk.com site. Thank you for your assistance in accomplishing this first step.

While the posts and profile remain at <http://www.jerk.com>, [REDACTED] we understand these may take some time to remove. We appreciate any and all information and updates you can provide with respect to their removal. Again, if there is something that needs to be done at our end, or by the original posters, to make this go away, please let us know. We are happy to help in any way we can.

Thank you,

Christi

-----Original Message-----

From: Campbell, Christiane
Sent: Thursday, January 03, 2013 4:34 PM
To: Maria Crimi Speth
Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

Certainly.

[REDACTED] profile/ posts here:

Photo of her children here: <http://www.jerk.com> [REDACTED]

Please let me know if you need anything else.

Christi

-----Original Message-----

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: Thursday, January 03, 2013 4:28 PM
To: Campbell, Christiane
Subject: Re: Notification of Violation of Jerk Terms & Conditions and Copyrights

Christine:

Please send me the link.

Sent from my iPad
Maria Crimi Speth
(602) 248-1089

On Jan 3, 2013, at 8:15 AM, "Campbell, Christiane" <ccampbell@duanemorris.com> wrote:

> Maria:

>

> Your last comments to me, in your e-mail dated December 8, were "I can't help you. But if you or the original poster pays for the support and does not get help, then I will intervene." I understand and respect that you are not willing or able to help until we've exhausted all possible options for trying to remove the posts ourselves.

>

> Since our last e-mail exchange, and together with our client , we have taken every possible known step to try and remove the disputed posts from Jerk.com. This includes, but is not limited to, creating accounts, entering credit card information (and paying for accounts/support), requesting removal, and using the "support," "dispute," and "abuse" functions. The best we were able to do was have our client post a comment and get confirmation that it was received (see attached). We've attempted to communicate the issues to Jerk Support directly, and have been unsuccessful. Indeed, we have not received any communication from Support since the initial DMCA take-down on October 22, 2012.

>

> The passage of time, coupled with our exhaustive efforts to resolve this issue, make it clear to us

that we either need you to intervene, or we will need to resort to litigation.

>
> Please get in touch with me at your earliest convenience, and let me know if there is anything further you need from us in order to intervene.

>
> Thank you,

>
> Christi

>
>
> -----Original Message-----

> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Saturday, December 08, 2012 12:18 AM
> To: Campbell, Christiane
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>
> I can't help you. But if you or the original poster pays for the support and does not get help, then I will intervene.

>
> Maria Crimi Speth, Esq.
> Jaburg & Wilk, P.C.
> 3200 N. Central Ave., Suite 2000
> Phoenix, AZ 85012

>
> 602-248-1089
> 602-248-0522 (fax)
>
> www.jaburgwilk.com

>
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>
> -----Original Message-----

> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
> Sent: Friday, December 07, 2012 3:11 PM
> To: Maria Crimi Speth
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>
> Maria -

>
> Thanks for getting back to me.

>
> In the interest of full disclosure, what we have is two parties on opposite sides of a dispute, about postings made on Jerk.com. Our client was the subject of the offending posts, the other side was the party posting. The parties are in the process of resolving the issues, but the final piece is the requirement that the other side remove the offending posts. The other side, through its counsel, has agreed to remove the posts, but needs to know from Jerk exactly what steps it can (and must) take to remove them. My understanding is that they've been unsuccessful in getting through to Jerk Support, to get its assistance with take-down (or other remedy).

>
> As I mentioned to you before, I am not the poster - I created an account with Jerk in the effort to dispute or report the posts, but had no luck. I've also e-mailed Jerk Support (they were previously responsive), but... crickets. Surely, it is not the \$25 that is the issue - it is simply our firm policy not to use credit cards for such things. Further - if I or the other side enter credit card or other payment information, we want some assurance that we would be afforded the benefit of Jerk Support's help in removing the posts.

>
> We just want to speak to Jerk Support to determine what steps the parties can take to remove the offending posts, and then have a discussion with counsel for the other side on the line to discuss each needed step. If we have to pay \$25 to speak with Jerk Support about this - or \$90 for a year subscription to deal with this - so be it.
>
> Lawyer-to-lawyer, we are asking that you please facilitate the communication with Jerk Support and let us know what costs are involved.
>
> Christiane
>
>
>
> -----Original Message-----
> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Friday, December 07, 2012 12:11 AM
> To: Campbell, Christiane
> Subject: Re: Notification of Violation of Jerk Terms & Conditions and Copyrights
>
> Christi:
>
> I do not I understand. What happens when you try to reach support? When you say that you are uncomfortable with entering a credit card and making a payment, do you mean that you haven't done that? My understanding is that support is \$25. So, are you saying that you are willing to charge your client for the time you have taken in these communications and comfortable with me billing my client for my time in this, but not comfortable with paying \$25?
>
> Sent from my iPad
> Maria Crimi Speth
> (602) 248-1089
>
>
> On Dec 6, 2012, at 2:54 PM, "Campbell, Christiane"
<ccampbell@duanemorris.com<<mailto:ccampbell@duanemorris.com>>> wrote:
>
> Maria -
>
> Per my voice mail of a few moments ago:
>
> Following our discussion last Friday, we've tried repeatedly - without success - to reach Jerk Support, to ask how a subscriber to its site might go about removing or at least hiding certain posts. We are contacting you again because Jerk Support has been unresponsive (and contacting Jerk Support through the Jerk site requires entry of a credit card number and payment, something we are obviously not comfortable with).
>
> We ask that you please forward this on to Jerk and ask that they get in touch with me directly, or please provide me with contact information I can use to reach someone in a position that can assist.
>
> We note that we are working closely with the offending poster, to resolve these issues. They are cooperating but we need Jerk's help to complete the final pieces.
>
> Thank you,
> Christi Campbell
>
> From: Campbell, Christiane
> Sent: Friday, November 23, 2012 9:52 AM
> To: 'Maria Crimi Speth'
> Cc: [REDACTED]
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
> Importance: High

>
> Dear Maria:
>
> Thank you for your help thus far, with respect to the Jerk.com<<http://Jerk.com>> postings about our client and its employees.
>
> There are some outstanding questions and issues we'd like to discuss with you, and counsel for the account holder of the posts in question (he has agreed to ma call).
>
> Are you available today (Friday Nov. 23) for a call with us and account-holder's counsel? If so, please propose some times, or let us know what times you are not available. If today does not work for you, please let us know when you might be available on Monday (Nov. 26).
>
> Thank you in advance.
>
> Christiane Campbell
>
> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Friday, October 12, 2012 4:48 PM
> To: Campbell, Christiane; 'support@jerk.com'<<mailto:support@jerk.com>>'
> Cc: [REDACTED]
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
>
> Ms. Campbell:
>
> I handle the legal issues, not the policy issues. You may use the support function of the website for the inquiry you are making.
>
> Maria Crimi Speth, Esq.
> Jaburg & Wilk, P.C.
> 3200 N. Central Ave., Suite 2000
> Phoenix, AZ 85012
>
> 602-248-1089
> 602-248-0522 (fax)
>
> www.jaburgwilk.com<<http://www.jaburgwilk.com/>>
>
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>
>
>
> _____
> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
> Sent: Friday, October 12, 2012 1:14 PM
> To: Maria Crimi Speth; 'support@jerk.com'<<mailto:support@jerk.com>>'
> Cc: [REDACTED]
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
> Importance: High
> Dear Maria:
>
> Thank you for your e-mail below. I've been unsuccessful reaching you by telephone, but I understand you must be inundated. I am following up in writing because this is an extremely important and time-sensitive issue for our client, [REDACTED]
>
> While we recognize and appreciate that the Communications Decency Act (specifically, 47 U.S.C.

§230, the "Act") protects your client from the status of "publisher" or "speaker" of offensive Internet posts on its site, we also point out that the very aim of the Good Samaritan clauses of the Act is to facilitate (and shield from liability for) the good faith removal of user-generated content that may be considered obscene, lewd, filthy, harassing, or otherwise objectionable, whether or not such material is constitutionally protected. Under the Act, your client also would not be civilly liable for taking action to enable or make available to information content providers or others the technical means to restrict access the objectionable material.

>

> Importantly, it appears your client's own Terms & Conditions contemplate the Act. Specifically, Paragraph 2 states: [Account holder] will NOT post on jerk.com< <http://jerk.com>> any defamatory, inaccurate, abusive, obscene, profane, offensive, threatening, harassing . material ." The Terms & Conditions also call for termination of the account holder's account.

>

> This letter is not intended as a threat to Jerk, by legal action or otherwise. We are merely requesting that your client adhere to its own Terms & Conditions and act in a manner consistent with the spirit of the Act under which it claims immunity. We repeat our request that the offending account be terminated, and the account holder information released to [REDACTED]. We further request that the offending posts be made invisible.

>

> Please contact me at your earliest convenience with any questions you might have. Otherwise, I look forward to hearing from you with information and confirmation of action taken in response to the above requests.

>

> Thank you,

>

> Christiane Campbell

>

>

> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]

> Sent: Wednesday, October 10, 2012 5:30 PM

> To: Campbell, Christiane; 'support@jerk.com' <<mailto:support@jerk.com>>'

> Cc: [REDACTED]

> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>

> Ms. Campbell:

>

> The photograph will be removed pursuant to the DMCA. The remaining materials are user generated content and Jerk.com< <http://Jerk.com>> is protected from liability under the Communications Decency Act.

>

> Maria Crimi Speth, Esq.

> Jaburg & Wilk, P.C.

> 3200 N. Central Ave., Suite 2000

> Phoenix, AZ 85012

>

> 602-248-1089

> 602-248-0522 (fax)

>

> www.jaburgwilk.com< <http://www.jaburgwilk.com/>>

>

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Dissemination, distribution, or copying of this communication by anyone other than the intended recipient, or a duly designated employee or agent of such recipient, is prohibited. If you have received this communication in error, please notify us immediately by telephone at (602) 248-1000, or via e-mail, and delete this message and all attachments thereto.

>

>

>

> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]

attorney-client or any other privilege.
> <image002.png>

CX0758

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [REDACTED]
Subject: [REDACTED]
Date: Tuesday, January 15, 2013 4:57:00 PM

This is in response to your letter of November 8, 2012 which I did not receive until January 7, 2013. Jerk.com is governed by U.S. law and your letter does not comply with U.S. Law. Nor does U.S. law require permission for the posting that you attached, which was made by a third party and not by Jerk.com.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com <<http://www.jaburgwilk.com>>

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CX0759

MARKED CONFIDENTIAL

From: [Shadi Katirai](#)
To: [Maria Crimi Speth](#)
Subject: FW: Removal of posting of [REDACTED] on jerk.com
Date: Friday, January 18, 2013 11:05:13 AM
Attachments: [Letter to Speth Jan. 2.2013.doc](#)

Dear Ms. Crimi Speth,

Kindly advise as to the status of the removal as per the DMCA request of January 2, 2013.

Regards,

Shadi Katirai

Shadi S. Katirai
STIEBER BERLACH LLP

phone: 416.594.4696
skatirai@sblegal.ca <<mailto:skatirai@sblegal.ca>>

----- Forwarded message -----

From: Shadi Katirai <skatirai@sblegal.ca>
Date: Wed, Jan 2, 2013 at 2:19 PM
Subject: RE: Removal of posting of [REDACTED] on jerk.com
To: Maria Crimi Speth <mcs@jaburgwilk.com>
Cc: [REDACTED]

Dear Ms. Speth,

Attached is a DMCA notice letter with respect to our previous request.

Regards,

Shadi Katirai

Shadi S. Katirai
STIEBER BERLACH LLP

phone: 416.594.4696
skatirai@sblegal.ca <<mailto:skatirai@sblegal.ca>>

-----Original Message-----

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: December 20, 2012 12:28 AM
To: Rose Keong
Cc: Shadi Katirai
Subject: RE: Removal of posting of [REDACTED] on jerk.com

Mr. Katirai:

Jerk.com is operated by a U.S. company and is governed by U.S. law. If your client has a valid copyright claim, you may submit a DMCA notice to me and it will be processed pursuant to U.S. law.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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From: Rose Keong [<mailto:RKeong@sblegal.ca>]
Sent: Tuesday, December 18, 2012 11:28 AM
To: Maria Crimi Speth
Cc: Shadi Katirai
Subject: Removal of posting of [REDACTED] on jerk.com

<<Ltr to M. Crimi Speth Esq. re removal of [REDACTED] on jerk.com Dec 17 12.pdf>>

Dear Ms. Crimi Speth,

Please find enclosed a letter from Shadi Katirai dated December 18, 2012 requiring your immediate attention. Should you have any questions or concerns, please do not hesitate to contact her at her e-mail address given above.

Rose Keong
Assistant to Shadi Katirai
Stieber Berlach LLP
Barristers & Solicitors
18th Floor, 130 Adelaide Street West
Toronto, Ontario
M5H 3P5
(416) 366-1400 ext. 2795

JERK 00359
CX0759-02

rkeong@sblegal.ca
www.sblegal.ca

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WARNING: From time to time, our spam scanners eliminate legitimate email from clients. If your email contains important instructions, please ensure that we acknowledge receipt of those instructions.

The information contained in this e-mail and any documents accompanying this transmission is privileged and confidential and intended only for the use of the individual or entity to who it is addressed. If you are not the intended recipient, you are hereby notified that any distribution, copying, disclosure or taking of any action in reliance on the contents of this transmission is strictly prohibited and review by any individual other than the intended recipient shall not constitute waiver of privilege. If you have received this e-mail in error, please notify us and delete the message and any accompanying documents. Thank you for your cooperation and assistance.

WARNING: From time to time, our spam scanners eliminate legitimate email from clients. If your email contains important instructions, please ensure that we acknowledge receipt of those instructions.

CX0760

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [REDACTED]
Cc: support@jerk.com
Subject: Re: removal
Date: Thursday, January 31, 2013 7:16:36 PM

[REDACTED]

If you want a response, you need to go through the paid support function.

Sent from my iPad
Maria Crimi Speth
(602) 248-1089

On Jan 28, 2013, at 8:35 PM, [REDACTED] wrote:

> Dear Support,
>
> My name is [REDACTED]. I have, on more than one occasion requested the removal of my name and image from your website. I have been assured by one of your attorneys (copied above) that all I needed to do was contact the site and my name and image would be removed. I, at no point authorized the use of my name or image to this site. I find the whole thing humiliating and harassing. Please remove my name and image from your site immediately.
>
> Thank you,
> [REDACTED]

CX0761

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [REDACTED]
Subject: RE: REMOVE
Date: Friday, March 08, 2013 3:48:27 PM

I have confirmed that there is a support function that does not include a monthly fee where you can explain your situation and ask for relief.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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From: [REDACTED]
Sent: Wednesday, March 06, 2013 3:30 PM
To: Maria Crimi Speth
Subject: Re: REMOVE

Maria,

thank you for continuing the correspondence.

There is a one time fee of \$90 plus a "maintenance" fee.

All I want is my information taken down. I don't know who would be so cruel to add it (perhaps an angry ex boyfriend) but having my name connected to this site has caused serious professional consequences.

I am not wealthy nor can afford to spend money to hire an attorney to fight the owners of the site.

I like everyone else who has been added to this site just want the bullying to stop and have our names taken down.

What recourse do I have outside of pleading my case to you?

JERK 00403
CX0761-1

On Wed, Mar 6, 2013 at 4:15 PM, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

It is not my understanding that it is a monthly fee, I thought it was a one time.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

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-----Original Message-----

From: [REDACTED]

Sent: Friday, March 01, 2013 9:18 PM
To: Maria Crimi Speth
Subject: Re: REMOVE

It's a monthly service fee!!
Outrageous. I shouldn't have to pay to not be cyber bullied.

I sent this message from my iPhone, please forgive any typos or errors.

On Mar 1, 2013, at 10:01 PM, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

> My understanding is that support is around \$30, not \$90. Did you try that?

>

> Maria Crimi Speth, Esq.
> Jaburg & Wilk, P.C.
> 3200 N. Central Ave., Suite 2000
> Phoenix, AZ 85012

>

> 602-248-1089
> 602-248-0522 (fax)

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> -----Original Message-----

> From: [REDACTED]
> Sent: Monday, February 25, 2013 1:13 PM
> To: Maria Crimi Speth
> Subject: Re: REMOVE

>

> Maria,

> I have tried that and it has not worked!

> I don't believe I should have to pay \$90 to have my name removed from this cyber bullying site!!

> Do you have another ideas on how to fight this battle?

>

> Best,

>

>

> [REDACTED]

>

> "Love cures all except poverty and a toothache."~Mae West "The lion doesn't lose sleep over the opinion of the sheep."

> "When you know better, you do better."~Maya Angelou

>

> This message was sent from my iPad, please forgive any typos or misspellings.

>

> On Feb 25, 2013, at 2:06 PM, Maria Crimi Speth <mcs@jaburgwilk.com> wrote:

>

>> [REDACTED]

>>

>> I am only legal counsel and I do not have the ability to remove profiles, nor do I address policy issues. The website has an online support system to which you may direct your request.

>>

>> Maria Crimi Speth, Esq.

>> Jaburg & Wilk, P.C.

>> 3200 N. Central Ave., Suite 2000

>> Phoenix, AZ 85012

>>

>> 602-248-1089

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>>

>>

>> -----Original Message-----

>> From: [REDACTED]
>> Sent: Monday, February 25, 2013 8:02 AM

>> To: Maria Crimi Speth

>> Subject: REMOVE

>>

>> Maria,

>> It has come to my attention that my name has been submitted to your client's website Jerk.com and I'd like the profile removed.

>> The site is crass, indecent and has the capability of ruining lives and causing great embarrassment.

>> I am in fact not a jerk, I volunteer on a hospice unit, sit on the board of several charities and am well liked by my peers and colleagues.

>> I'm not sure who nominated me for this site but it has had repercussions in my life that are directly related to this site.

JERK 00405

CX0761-3

>> I would kindly ask that you remove any and all information associated with me, my name, photos, links, posts etc.
>> If you cannot do this, I'd appreciate it if you could direct me to the right person who can.
>>
>> Thank you,
>> [REDACTED]
>> Chicago, IL
>>
>> I sent this message from my iPhone, please forgive any typos or errors.

JERK 00406

CX0761-4

CX0762

MARKED CONFIDENTIAL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, December 10, 2012 2:43 PM
To: Maria Crimi Speth
Subject: Cease and Desist

User [REDACTED] is 13 years old. Remove profile. Terms and conditions/terms of service have been violated. ssage and then delete it from your system. Thank you.

CX0764

MARKED CONFIDENTIAL

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Date: March 30, 2013, 11:39:25 PM MST
To: "mcs@jaburgwilk.com" <mcs@jaburgwilk.com>
Subject: Please Remove My Underage Son's Profile

Hello,

I would like to write to you about my son's profile on "Jerk.com." It has recently been called to my attention, and as my son is being bullied in school it causes him great distress that one of his bullies seemed to have created a page on your website. I am appalled to learn that your website promotes bullying; especially when there is already a major issue with bullying in schools across America as I am sure you are aware. My son is also under the age of 14, and I read that Jerk.com should remove a page in this case. I am very worried about my son, and would very much appreciate if you remove his page and ban his name from ever appearing on your website again. As a parent I am worried about my son developing PTSD later on in life, or another severe psychiatric illness as a result of bullying. It's difficult enough that he gets bullied in school, so he shouldn't have to deal with it at home as well. I am especially worried due to the articles I read about which often state that bullying can lead to suicide; even in very young victims despite the help they can get. Please have some sympathy and remove his page, as well as ban his name from ever showing up on your website again. Thank you.

Here is the link to the page:
[http://www.jerk.com/\[REDACTED\]](http://www.jerk.com/[REDACTED])

Sincerely,
[REDACTED]

CX0765

MARKED CONFIDENTIAL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, April 01, 2013 11:04 PM
To: Maria Crimi Speth
Subject: Re: Remove underage child

Thank you for responding to our email. The link is www.jerk.com, [REDACTED]
Please remove it from google search as well. When you type in the name [REDACTED] it is the third posting down. Once again this is an under age child and in no way should her name be showing up on your site or in a google search that forwards to your site. We check daily to see if it has been removed. Once again thank you for responding to our email. Please inform us when you remove this link and name.

On 2013-04-01, at 11:35 PM, "Maria Crimi Speth" <mcs@jaburgwilk.com> wrote:

> I apologize for the delay in responding. Please send the link and we will remove that profile.

>

> Sent from my iPad

> Maria Crimi Speth

> (602) 248-1089

>

>

> On Mar 24, 2013, at 8:39 PM, [REDACTED] wrote:

>

>> Please remove [REDACTED] from your site jerk.com. This is a child under 14. If you do not we will be forced to take legal action for distribution of a minor. Thank you.

CX0770

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0771

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0772

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0773

**MARKED CONFIDENTIAL
REDACTED IN ITS ENTIRETY**

(Although Complaint Counsel proposes to redact only certain categories of information from this exhibit, the exhibit has been redacted in its entirety—in the public filing—to protect other parties’ rights to seek *in camera* protection.)

CX0775

MARKED CONFIDENTIAL

From: [Shadi Katirai](#)
To: [Maria Crimi Speth](#)
Subject: FW: Removal of posting of [REDACTED] on jerk.com
Date: Friday, January 18, 2013 11:05:13 AM
Attachments: [Letter to Speth Jan. 2.2013.doc](#)

Dear Ms. Crimi Speth,

Kindly advise as to the status of the removal as per the DMCA request of January 2, 2013.

Regards,

Shadi Katirai

Shadi S. Katirai
STIEBER BERLACH LLP

phone: 416.594.4696
skatirai@sblegal.ca <<mailto:skatirai@sblegal.ca>>

----- Forwarded message -----

From: Shadi Katirai <skatirai@sblegal.ca>
Date: Wed, Jan 2, 2013 at 2:19 PM
Subject: RE: Removal of posting of [REDACTED] on jerk.com
To: Maria Crimi Speth <mcs@jaburgwilk.com>
Cc: [REDACTED]

Dear Ms. Speth,

Attached is a DMCA notice letter with respect to our previous request.

Regards,

Shadi Katirai

Shadi S. Katirai
STIEBER BERLACH LLP

phone: 416.594.4696
skatirai@sblegal.ca <<mailto:skatirai@sblegal.ca>>

-----Original Message-----

From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
Sent: December 20, 2012 12:28 AM
To: Rose Keong
Cc: Shadi Katirai
Subject: RE: Removal of posting of [REDACTED] on jerk.com

Mr. Katirai:

Jerk.com is operated by a U.S. company and is governed by U.S. law. If your client has a valid copyright claim, you may submit a DMCA notice to me and it will be processed pursuant to U.S. law.

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

602-248-1089
602-248-0522 (fax)

www.jaburgwilk.com

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From: Rose Keong [<mailto:RKeong@sblegal.ca>]
Sent: Tuesday, December 18, 2012 11:28 AM
To: Maria Crimi Speth
Cc: Shadi Katirai
Subject: Removal of posting of [REDACTED] on jerk.com

<<Ltr to M. Crimi Speth Esq. re removal of [REDACTED] on jerk.com Dec 17 12.pdf>>

Dear Ms. Crimi Speth,

Please find enclosed a letter from Shadi Katirai dated December 18, 2012 requiring your immediate attention. Should you have any questions or concerns, please do not hesitate to contact her at her e-mail address given above.

Rose Keong
Assistant to Shadi Katirai
Stieber Berlach LLP
Barristers & Solicitors
18th Floor, 130 Adelaide Street West
Toronto, Ontario
M5H 3P5
(416) 366-1400 ext. 2795

JERK 00171
CX0775-02

rkeong@sblegal.ca
www.sblegal.ca

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Reply to:
Shadi Katirai
Direct Dial:
(416) 594-4696
skatirai@sblegal.ca
www.sblegal.ca

January 2, 2013

Sent By E-mail mcs@jaburgwilk.com

Maria Crimi Speth, Esq.
Jaburg & Wilk, P.C.
3200 N. Central Ave., Suite 2000
Phoenix, AZ 85012

Dear Ms. Speth:

Re: Removal of copyright material on Jerk.com re [REDACTED]

I am legal counsel for [REDACTED]. Your client, Jerk LLC on their website Jerk.com, is infringing on at least one copyright owned by [REDACTED].

A photograph and other information concerning [REDACTED] were copied onto their website without permission. The original photo, to which [REDACTED] owns the exclusive copyrights, can be found at:

[http://www.linkedin.com/pub/\[REDACTED\]](http://www.linkedin.com/pub/[REDACTED])

The unauthorized and infringing copy can be found at:

[http://www.jerk.com/\[REDACTED\]](http://www.jerk.com/[REDACTED])

This letter is official notification under **Section 512(c)** of the Digital Millennium Copyright Act ("DMCA"), and we seek the removal of the aforementioned infringing material from your servers. I request that you immediately notify the infringer of this notice and inform them of their duty to remove the infringing material immediately, and notify them to cease any further posting of infringing material to your server in the future.

Please also be advised that law requires you, as the site owner, to remove or disable access to the infringing materials upon receiving this notice. Under US law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If you do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright infringement action you will need to investigate and ultimately remove or otherwise disable the infringing

JERK 00173

CX0775-04

Stieber Berlach LLP

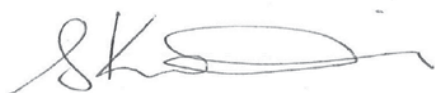
January 2, 2013
Page 2

material from your servers with all due speed should the direct infringer, your client, not comply immediately.

This notice is provided in good faith and with the reasonable belief that rights my client owns are being infringed. Under penalty of perjury I certify that the information contained in the notification is both true and accurate and that I have the authority to act on behalf of [REDACTED], the owner of the copyright(s) involved.

Should you wish to discuss this with me please contact me directly at the above noted address.

Yours truly,



(electronic signature)
Shadi Katirai

Cc: [REDACTED]

JERK 00174

CX0775-05

CX0776

MARKED CONFIDENTIAL

From: [Maria Crimi Speth](#)
To: [Campbell, Christiane](#)
Subject: Re: URGENT REQUEST: Notification of Violation of Jerk Terms & Conditions and Copyrights
Date: Thursday, May 02, 2013 9:20:01 AM

I am at a conference is week and cannot look into this.

Sent from my iPad
Maria Crimi Speth
(602) 248-1089

On May 2, 2013, at 7:48 AM, "Campbell, Christiane" <ccampbell@duanemorris.com> wrote:

> Maria:
>
> I am just following up with you regarding the [REDACTED] profile and posts referenced in my e-mail below.
>
> Our client is most concerned with the references to [REDACTED], and the post claiming our client's employee "probably has AIDS." At the very least, we are seeking immediate removal of these references and claims.
>
> Please acknowledge receipt at your earliest convenience. We appreciate your attention to this most sensitive issue.
>
> Christi
>
> -----Original Message-----
> From: Campbell, Christiane
> Sent: Tuesday, April 30, 2013 11:53 AM
> To: Maria Crimi Speth
> Subject: URGENT REQUEST: Notification of Violation of Jerk Terms & Conditions and Copyrights
> Importance: High
>
> Maria:
>
> We note, with great appreciation, that the [REDACTED] profile has remained invisible since our last exchange of e-mails in early January. We are seeking your urgent attention to a follow-up request.
>
> We just found a similar profile for [REDACTED] using the name [REDACTED] (see <http://www.jerk.com> [REDACTED]). We are extraordinarily concerned because the profile references our client [REDACTED] in the contact information, and one of the posts states: "She\'s probably has AIDS she\'s such a prostitute w****." (sic) The other posts unquestionably paint our client and its employee in a negative light, by posting comments that are false, objectionable, and certainly not of public concern.
>
> I understand now this profile is probably what you were alluding to in your January 11 e-mail, copied below for reference. However, at the time of our last exchange, we were not aware of this profile: a search of the Jerk site for [REDACTED] or alternate names did not resolve to this profile. Indeed, it still does not - we were only able to find it by performing a Google search for [REDACTED]
>
> You will see this profile has no recent posts, and the last one was made in August 2012, prior to the most recent posts in the since-removed [REDACTED] profile. The content of the posts is substantially similar to the content in the posts to the [REDACTED] profile, and even references the same. The [REDACTED] profile is potentially extraordinarily harmful to our client, if seen.
>
> Although this profile was apparently overlooked in our prior requests to you and Jerk, we are asking

JERK 00190
CX0776-01

now for consistent treatment of this profile - i.e., that it be removed or made invisible. We trust this will not be an issue, however, please advise if you have questions or require anything further from me in order to assist.

>
> Thank you, as always, for your prompt attention to and assistance with this most important matter.

>
> Christi

>
>
> -----Original Message-----

> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Friday, January 11, 2013 1:14 PM
> To: Campbell, Christiane
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>
> Christi:

>
> The profile has been removed again. Users are able to repost and may do that. There may be other profiles. Users have in fact made similar profiles under other names. So long as the support payment is up to date your client can email support requesting removal of any additional profiles she discovers. If the support request is not handled to your satisfaction feel free to email me.

>
>
> Maria Crimi Speth, Esq.
> Jaburg & Wilk, P.C.
> 3200 N. Central Ave., Suite 2000
> Phoenix, AZ 85012

>
> 602-248-1089
> 602-248-0522 (fax)

>
> www.jaburgwilk.com

>
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>
> -----Original Message-----

> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
> Sent: Friday, January 11, 2013 10:08 AM
> To: Maria Crimi Speth
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
> Importance: High

>
> Maria:

>
> Your e-mail to me yesterday stated "The profile has been removed." Any reasonable inference that can be drawn from this statement, made by counsel, would lead us - and our client - to believe that [REDACTED] profile and posts located at <http://www.jerk.com> [REDACTED] (the "Profile") was removed. Based on our prior exchanges, it is also reasonable to infer that the removal was permanent. As mentioned yesterday, the site and the Profile were indeed down for a time (see attached screen images), went back up, and then appeared to be down again. However, I learned late in the afternoon that while the site and Profile were not visible or accessible to me, they were very much live and active for others.

>
> Today, the site and Profile remain up.

>

> What your client apparently views as a game, our client takes very seriously. This is our client's company and reputation. Meanwhile, we see no legitimate benefit to your client in leaving the Profile up. It already received payment from our client seeking support and removal of the Profile, for which our client obviously received no return on its investment.

>

> Understanding that you may not have control over your client, and they may not be forthcoming with you, we will give you and Jerk the courtesy of until close of business (5pm) our local time (Eastern Standard Time) today, January 11, 2013, to communicate and get the Profile permanently removed. If this is not done, we will advise our client to take legal action with no further notice to you.

>

> Christi

>

> -----Original Message-----

> From: Campbell, Christiane

> Sent: Thursday, January 10, 2013 2:48 PM

> To: Maria Crimi Speth

> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

> Importance: High

>

> Maria:

>

> Thank you. About an hour ago, immediately after receiving your e-mail, I checked the site and the disputed profile and posts were down. I checked again just a moment ago, and they are back up.

> See: <http://www.jerk.com> [REDACTED]. As you know, we are seeking permanent removal of the profile and posts.

>

> Thank you,

>

> Christi

>

> -----Original Message-----

> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]

> Sent: Thursday, January 10, 2013 1:16 PM

> To: Campbell, Christiane

> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>

> The profile has been removed.

>

> Maria Crimi Speth, Esq.

> Jaburg & Wilk, P.C.

> 3200 N. Central Ave., Suite 2000

> Phoenix, AZ 85012

>

> 602-248-1089

> 602-248-0522 (fax)

>

> www.jaburgwilk.com

>

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>

> -----Original Message-----

> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]

> Sent: Tuesday, January 08, 2013 11:08 AM

> To: Maria Crimi Speth

> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

> Importance: High
>
> Maria:
>
> We note, with great appreciation, that as of the end of last week, the photograph of [REDACTED] children was removed or hidden from the Jerk.com site. Thank you for your assistance in accomplishing this first step.
>
> While the posts and profile remain at <http://www.jerk.com> [REDACTED], we understand these may take some time to remove. We appreciate any and all information and updates you can provide with respect to their removal. Again, if there is something that needs to be done at our end, or by the original posters, to make this go away, please let us know. We are happy to help in any way we can.
>
> Thank you,
>
> Christi
>
> -----Original Message-----
> From: Campbell, Christiane
> Sent: Thursday, January 03, 2013 4:34 PM
> To: Maria Crimi Speth
> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
>
> Certainly.
>
> [REDACTED] profile/ posts here:
>
> Photo of her children here: <http://www.jerk.com> [REDACTED]
>
> Please let me know if you need anything else.
>
> Christi
>
>
> -----Original Message-----
> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
> Sent: Thursday, January 03, 2013 4:28 PM
> To: Campbell, Christiane
> Subject: Re: Notification of Violation of Jerk Terms & Conditions and Copyrights
>
> Christine:
>
> Please send me the link.
>
> Sent from my iPad
> Maria Crimi Speth
> (602) 248-1089
>
>
> On Jan 3, 2013, at 8:15 AM, "Campbell, Christiane" <ccampbell@duanemorris.com> wrote:
>
>> Maria:
>>
>> Your last comments to me, in your e-mail dated December 8, were "I can't help you. But if you or the original poster pays for the support and does not get help, then I will intervene." I understand and respect that you are not willing or able to help until we've exhausted all possible options for trying to remove the posts ourselves.
>>
>> Since our last e-mail exchange, and together with our client , we have taken every possible known

step to try and remove the disputed posts from Jerk.com. This includes, but is not limited to, creating accounts, entering credit card information (and paying for accounts/support), requesting removal, and using the "support," "dispute," and "abuse" functions. The best we were able to do was have our client post a comment and get confirmation that it was received (see attached). We've attempted to communicate the issues to Jerk Support directly, and have been unsuccessful. Indeed, we have not received any communication from Support since the initial DMCA take-down on October 22, 2012.

>>

>> The passage of time, coupled with our exhaustive efforts to resolve this issue, make it clear to us that we either need you to intervene, or we will need to resort to litigation.

>>

>> Please get in touch with me at your earliest convenience, and let me know if there is anything further you need from us in order to intervene.

>>

>> Thank you,

>>

>> Christi

>>

>>

>> -----Original Message-----

>> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]

>> Sent: Saturday, December 08, 2012 12:18 AM

>> To: Campbell, Christiane

>> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>>

>> I can't help you. But if you or the original poster pays for the support and does not get help, then I will intervene.

>>

>> Maria Crimi Speth, Esq.

>> Jaburg & Wilk, P.C.

>> 3200 N. Central Ave., Suite 2000

>> Phoenix, AZ 85012

>>

>> 602-248-1089

>> 602-248-0522 (fax)

>>

>> www.jaburgwilk.com

>>

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>>

>> -----Original Message-----

>> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]

>> Sent: Friday, December 07, 2012 3:11 PM

>> To: Maria Crimi Speth

>> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>>

>> Maria -

>>

>> Thanks for getting back to me.

>>

>> In the interest of full disclosure, what we have is two parties on opposite sides of a dispute, about postings made on Jerk.com. Our client was the subject of the offending posts, the other side was the party posting. The parties are in the process of resolving the issues, but the final piece is the requirement that the other side remove the offending posts. The other side, through its counsel, has agreed to remove the posts, but needs to know from Jerk exactly what steps it can (and must) take to remove them. My understanding is that they've been unsuccessful in getting through to Jerk Support,

to get its assistance with take-down (or other remedy).

>>

>> As I mentioned to you before, I am not the poster - I created an account with Jerk in the effort to dispute or report the posts, but had no luck. I've also e-mailed Jerk Support (they were previously responsive), but... crickets. Surely, it is not the \$25 that is the issue - it is simply our firm policy not to use credit cards for such things. Further - if I or the other side enter credit card or other payment information, we want some assurance that we would be afforded the benefit of Jerk Support's help in removing the posts.

>>

>> We just want to speak to Jerk Support to determine what steps the parties can take to remove the offending posts, and then have a discussion with counsel for the other side on the line to discuss each needed step. If we have to pay \$25 to speak with Jerk Support about this - or \$90 for a year subscription to deal with this - so be it.

>>

>> Lawyer-to-lawyer, we are asking that you please facilitate the communication with Jerk Support and let us know what costs are involved.

>>

>> Christiane

>>

>>

>>

>> -----Original Message-----

>> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]

>> Sent: Friday, December 07, 2012 12:11 AM

>> To: Campbell, Christiane

>> Subject: Re: Notification of Violation of Jerk Terms & Conditions and Copyrights

>>

>> Christi:

>>

>> I do not I understand. What happens when you try to reach support? When you say that you are uncomfortable with entering a credit card and making a payment, do you mean that you haven't done that? My understanding is that support is \$25. So, are you saying that you are willing to charge your client for the time you have taken in these communications and comfortable with me billing my client for my time in this, but not comfortable with paying \$25?

>>

>> Sent from my iPad

>> Maria Crimi Speth

>> (602) 248-1089

>>

>>

>> On Dec 6, 2012, at 2:54 PM, "Campbell, Christiane"

<ccampbell@duanemorris.com<<mailto:ccampbell@duanemorris.com>>> wrote:

>>

>> Maria -

>>

>> Per my voice mail of a few moments ago:

>>

>> Following our discussion last Friday, we've tried repeatedly - without success - to reach Jerk Support, to ask how a subscriber to its site might go about removing or at least hiding certain posts. We are contacting you again because Jerk Support has been unresponsive (and contacting Jerk Support through the Jerk site requires entry of a credit card number and payment, something we are obviously not comfortable with).

>>

>> We ask that you please forward this on to Jerk and ask that they get in touch with me directly, or please provide me with contact information I can use to reach someone in a position that can assist.

>>

>> We note that we are working closely with the offending poster, to resolve these issues. They are cooperating but we need Jerk's help to complete the final pieces.

>>

>> Thank you,

>> Christi Campbell
>>
>> From: Campbell, Christiane
>> Sent: Friday, November 23, 2012 9:52 AM
>> To: 'Maria Crimi Speth'
>> Cc: [REDACTED]
>> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
>> Importance: High
>>
>> Dear Maria:
>>
>> Thank you for your help thus far, with respect to the Jerk.com<<http://Jerk.com>> postings about our client and its employees.
>>
>> There are some outstanding questions and issues we'd like to discuss with you, and counsel for the account holder of the posts in question (he has agreed to ma call).
>>
>> Are you available today (Friday Nov. 23) for a call with us and account-holder's counsel? If so, please propose some times, or let us know what times you are not available. If today does not work for you, please let us know when you might be available on Monday (Nov. 26).
>>
>> Thank you in advance.
>>
>> Christiane Campbell
>>
>> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
>> Sent: Friday, October 12, 2012 4:48 PM
>> To: Campbell, Christiane; 'support@jerk.com<<mailto:support@jerk.com>>'
>> Cc: [REDACTED]
>> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
>>
>> Ms. Campbell:
>>
>> I handle the legal issues, not the policy issues. You may use the support function of the website for the inquiry you are making.
>>
>> Maria Crimi Speth, Esq.
>> Jaburg & Wilk, P.C.
>> 3200 N. Central Ave., Suite 2000
>> Phoenix, AZ 85012
>>
>> 602-248-1089
>> 602-248-0522 (fax)
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>> www.jaburgwilk.com<<http://www.jaburgwilk.com/>>
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>>
>>
>>
>> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
>> Sent: Friday, October 12, 2012 1:14 PM
>> To: Maria Crimi Speth; 'support@jerk.com<<mailto:support@jerk.com>>'
>> Cc: [REDACTED]
>> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights

>> Importance: High
>> Dear Maria:
>>
>> Thank you for your e-mail below. I've been unsuccessful reaching you by telephone, but I understand you must be inundated. I am following up in writing because this is an extremely important and time-sensitive issue for our client, [REDACTED]
>>
>> While we recognize and appreciate that the Communications Decency Act (specifically, 47 U.S.C. §230, the "Act") protects your client from the status of "publisher" or "speaker" of offensive Internet posts on its site, we also point out that the very aim of the Good Samaritan clauses of the Act is to facilitate (and shield from liability for) the good faith removal of user-generated content that may be considered obscene, lewd, filthy, harassing, or otherwise objectionable, whether or not such material is constitutionally protected. Under the Act, your client also would not be civilly liable for taking action to enable or make available to information content providers or others the technical means to restrict access the objectionable material.
>>
>> Importantly, it appears your client's own Terms & Conditions contemplate the Act. Specifically, Paragraph 2 states: [Account holder] will NOT post on jerk.com<<http://jerk.com>> any defamatory, inaccurate, abusive, obscene, profane, offensive, threatening, harassing . material ." The Terms & Conditions also call for termination of the account holder's account.
>>
>> This letter is not intended as a threat to Jerk, by legal action or otherwise. We are merely requesting that your client adhere to its own Terms & Conditions and act in a manner consistent with the spirit of the Act under which it claims immunity. We repeat our request that the offending account be terminated, and the account holder information released to [REDACTED] We further request that the offending posts be made invisible.
>>
>> Please contact me at your earliest convenience with any questions you might have. Otherwise, I look forward to hearing from you with information and confirmation of action taken in response to the above requests.
>>
>> Thank you,
>>
>> Christiane Campbell
>>
>>
>> From: Maria Crimi Speth [<mailto:mcs@jaburgwilk.com>]
>> Sent: Wednesday, October 10, 2012 5:30 PM
>> To: Campbell, Christiane; 'support@jerk.com<<mailto:support@jerk.com>>'
>> Cc: [REDACTED].
>> Subject: RE: Notification of Violation of Jerk Terms & Conditions and Copyrights
>>
>> Ms. Campbell:
>>
>> The photograph will be removed pursuant to the DMCA. The remaining materials are user generated content and Jerk.com<<http://Jerk.com>> is protected from liability under the Communications Decency Act.
>>
>> Maria Crimi Speth, Esq.
>> Jaburg & Wilk, P.C.
>> 3200 N. Central Ave., Suite 2000
>> Phoenix, AZ 85012
>>
>> 602-248-1089
>> 602-248-0522 (fax)
>>
>> www.jaburgwilk.com<<http://www.jaburgwilk.com/>>
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>>
>>
>>

>> From: Campbell, Christiane [<mailto:ccampbell@duanemorris.com>]
>> Sent: Friday, October 05, 2012 4:42 PM
>> To: 'support@jerk.com<<mailto:support@jerk.com>>'
>> Cc: [REDACTED]
>> Subject: Notification of Violation of Jerk Terms & Conditions and Copyrights
>> Importance: High
>> Dear Sir or Madam:

>>
>> Please see the attached letter and its attachments. A certified copy of the same will follow. The letter is dated today, October 5, 2012. Note that your written response is requested by October 12, 2012. You may respond by letter or e-mail.

>>
>> We look forward to hearing from you, in writing, no later than October 12, 2012.

>>
>> <image001.jpg><<http://www.duanemorris.com/>>
>>
>>
>> www.duanemorris.com<<http://www.duanemorris.com/>>

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>>
>>
>>
>>
>>

>> Christiane (Christi) Campbell
>> Associate

>>
>>
>> Duane Morris LLP
>> 30 South 17th Street
>> Philadelphia, PA 19103-4196

>>
>> P: 215.979.1817
>> F: 215.689.4910
>> C: [REDACTED]

>>
>>
>> E-MAIL<<mailto:ccampbell@duanemorris.com>> |
BIO<<http://duanemorris.com/attorneys/christianeschuman.html>> |
VCARD<<http://www.duanemorris.com/attorneys/vCard/5598.vcf>>

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>> <image002.png>

CX0810
PLACEHOLDER
ORIGINAL DVD

(See CX0049, CX0050, and
CX0053)

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of)

Jerk, LLC, a limited liability company,)
also d/b/a JERK.COM, and)

John Fanning,)
individually and as a member of Jerk,)
LLC.)

) PUBLIC

) DOCKET NO. 9361

ATTACHMENT B
PERSONS WHO SHOULD BE NOTIFIED

MARKED CONFIDENTIAL
REDACTION IN ITS ENTIRETY
REQUESTED