

and other equitable relief for Defendants' violations of Section 5(a) of CAN-SPAM, 15 U.S.C. § 7704(a).

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 15 U.S.C. §§ 45(m)(1)(A), 53(b), 56(a), 57b, and 7706(a), and 28 U.S.C. §§ 1331, 1337(a), 1345, and 1355. This action arises under 15 U.S.C. § 45(a).
3. Venue in the United States District Court for the Northern District of Illinois is proper under 15 U.S.C. § 53(b), and 28 U.S.C. §§ 1391 (b-c) and 1395(a).

DEFENDANTS

4. Defendant ATM Global Systems, Inc. ("ATM Global") is a Florida corporation with its principal address at 10211 Crosswind Rd., Boca Raton, Florida 33498.
5. Defendant Mark Richman is president of ATM Global. Richman has formulated, directed, controlled, or participated in the acts or practices set forth in this Complaint.
6. Defendant Nathaniel Seidman is vice-president of ATM Global. Seidman has formulated, directed, controlled, or participated in the acts or practices set forth in this Complaint. Seidman also does business as GPC Marketing Ltd.
7. "Defendants" means ATM Global, Mark Richman and Nathaniel Seidman.
8. Defendants have transacted business in the Northern District of Illinois and throughout the United States.

