

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

**FEDERAL TRADE COMMISSION, *et al.*,**

**Plaintiffs,**

**v.**

**CLICK4SUPPORT, LLC, *et al.*,**

**Defendants.**

**CIVIL ACTION NO. 15-5777**

**PLAINTIFFS' MOTION FOR  
LEAVE TO FILE AMENDED  
COMPLAINT FOR PERMANENT  
INJUNCTION AND OTHER  
EQUITABLE RELIEF**

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiffs Federal Trade Commission, the State of Connecticut, Office of Attorney General, and the Commonwealth of Pennsylvania, Office of Attorney General, (collectively, "Plaintiffs") respectfully move the Court for leave to file the attached Amended Complaint for Permanent Injunction and Other Equitable Relief ("Amended Complaint").

Rule 15 provides that "a party may amend its pleading [with] the court's leave" and that "[t]he court should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2). Plaintiffs move to file the Amended Complaint within the time permitted by the Court in the scheduling order (Doc. 85). Allowing Plaintiffs to file the Amended Complaint would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.

Through the Amended Complaint, Plaintiffs seek to add three new Defendants—one corporation, Innovazion Research Private Limited, and two individuals, Abhishek Gagneja and Rishi Gagneja—that were significantly involved in planning and perpetrating the technical support services scheme that has victimized thousands of U.S. consumers. Plaintiffs believe that, along with the original Defendants, these new Defendants engaged in practices that violate

Section 5(a) of the Federal Trade Commission Act, the Telemarketing Sales Rule (“TSR”), the Connecticut Unfair Trade Practices Act, and the Pennsylvania Unfair Trade Practices and Consumer Protection Law.

Further, Plaintiffs seek to allege two new counts based on conduct and practices uncovered by Plaintiffs and detailed in Defendants’ own court filings, live testimony before the Court, and discovery responses. These new counts include Count V (against all original and new Defendants) for credit card laundering, prohibited by the TSR, 16 C.F.R. § 310.3(c), and Count VI (against original Defendants Spanning Source LLC, iSourceUSA LLC, George Saab, Chetan Bhikhubhai Patel, and Niraj Patel) for assisting and facilitating the TSR violations of others, also prohibited by the TSR, 16 C.F.R. § 310.3(b).

Moreover, Plaintiffs seek to remove original Counts VI and VIII and other references in the original Complaint pertaining to civil penalties in order to clarify further that Plaintiffs do not seek such relief. Indeed, Plaintiffs remain focused on obtaining equitable monetary relief in this matter, including restitution for consumer victims and the disgorgement of Defendants’ ill-gotten gains.

For all these reasons, and those stated in the attached memorandum in support, Plaintiffs respectfully request that the Court grant Plaintiffs leave to file the attached Amended Complaint.

Also attached is a proposed order.

Respectfully Submitted,

Dated: March 15, 2016

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CERTIFICATE OF SERVICE

I certify that, on the date set forth below, the foregoing **PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF** was filed electronically and that it is available for viewing and downloading on the Court's CM/ECF system by the parties.

I further certify that, on the date set forth below, the same document was served on Defendant iSourceUSA LLC by First Class Mail at its registered office at Mayur Mehta & Co., 853 Second Street Pike, Suite B107, Richboro, Pennsylvania 18954.

Dated: March 15, 2016

/s/ Fil M. de Banate  
One of the Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

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

**FEDERAL TRADE COMMISSION, *et al.*,**

**Plaintiffs,**

**v.**

**CLICK4SUPPORT, LLC, *et al.*,**

**Defendants.**

**CIVIL ACTION NO. 15-5777**

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’  
MOTION FOR LEAVE TO FILE AMENDED COMPLAINT FOR  
PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

Pursuant to Rule 15, Plaintiffs Federal Trade Commission (“FTC”), State of Connecticut, Office of Attorney General, and Commonwealth of Pennsylvania, Office of Attorney General, (collectively, “Plaintiffs”) move the Court for leave to file the attached Amended Complaint for Permanent Injunction and Other Equitable Relief (“Amended Complaint”).

Based on additional facts and information provided by Defendants’ own filings, testimony, and discovery responses, Plaintiffs seek leave to amend the original Complaint to add three new Defendants and two new counts regarding Defendants’ technical support services scheme. Through the proposed Amended Complaint, Plaintiffs also seek to streamline this action by withdrawing allegations pertaining to civil penalties.

**I. PROCEDURAL BACKGROUND**

Plaintiffs filed the original Complaint on October 26, 2015, alleging that the original Defendants operated a common enterprise to perpetrate a technical support services scheme that has bilked millions of dollars from tens of thousands of consumers. To execute this scheme, Defendants deceived consumers into believing that they were affiliated with legitimate U.S.

technology companies and that they had detected vulnerabilities in consumers' computers, ultimately tricking consumers into purchasing unnecessary computer security or technical support services (collectively, "technical support services"). Plaintiff FTC filed concurrently an *ex parte* motion for a temporary restraining order ("TRO"), submitting substantial supporting evidence.

On October 27, 2015, the Court issued a TRO and scheduled a noticed preliminary injunction ("PI") hearing. The following day, on October 28, Plaintiffs served each Defendant with a summons and the original Complaint, as well as all filings related to the FTC's motion for TRO. On the same day, with permission from the Court-appointed Receiver, Plaintiffs participated in the immediate access of Defendants' business premises in Bensalem, Pennsylvania and Essex, Connecticut.

In advance of the PI hearing, Defendants submitted a number of documents for the Court's consideration, including a motion for live testimony (Doc. 18), a supplemental memorandum of law (Doc. 23), and declarations by Defendants Chetan Bhikhubhai Patel (Doc. 19), Niraj Patel (Docs. 20, 22), George Saab (Doc. 21), and Bruce Bartolotta (Doc. 75), as well as by Abhishek Gagneja (Doc. 76). The FTC responded with a brief and additional exhibits (Docs. 33, 33-1 through 33-5) and filed copies of documents obtained from Defendants' business premises (Docs. 34, 34-1). During the PI hearing on November 9 and 10, Defendants Niraj Patel, Chetan Bhikhubhai Patel, and George Saab testified about their involvement in the scheme (PI Hearing Trs., Docs. 77-78). The Court entered its PI order on November 10, 2015 (Doc. 42).

In December 2015, seven of the original Defendants answered the Complaint (Docs. 66, 69). On December 31, discovery commenced. On January 13, 2016, the Court entered a

scheduling order (Doc. 85), setting March 15, 2016 as the deadline to file amended pleadings. Fact discovery closes on July 1, 2016.

## **II. THE DEFENDANTS AND THEIR COMMON ENTERPRISE**

### **A. The Defendants**

The eight original Defendants include four corporate entities and four individuals. The four original corporate Defendants are Click4Support, LLC (“**C4S-CT**”), Innovazion Inc. (“**Innovazion US**”), Spanning Source LLC (“**Spanning Source**”), and iSourceUSA LLC (“**iSourceUSA**”). The four original individual Defendants are Bruce Bartolotta (“**Bartolotta**”), George Saab (“**Saab**”), Chetan Bhikhubhai Patel (“**C. Patel**”), and Niraj Patel (“**N. Patel**”).

Through the proposed Amended Complaint, Plaintiffs seek to add three new Defendants, one corporate entity and two individuals. The new corporate Defendant is Innovazion Research Private Limited (“**Innovazion India**”). The new individual Defendants are Abhishek Gagneja (“**A. Gagneja**”) and Rishi Gagneja (“**R. Gagneja**”). Innovazion India is a corporation with its principal place of business in New Delhi, India, and it sells technical support services.

A. Gagneja owns Innovazion India and is its chief executive officer. R. Gagneja serves as its director.

As described more fully below, the evidence shows that the Defendants organized themselves into two arms of a common enterprise. Plaintiffs refer to them as the “Provider Defendants” and the “Processor Defendants.” The **Provider Defendants** are Innovazion US, C4S-CT, and Bartolotta, along with new Defendants Innovazion India, A. Gagneja, and R. Gagneja. The Provider Defendants marketed, sold, and fulfilled the technical support services using call centers in India. The **Processor Defendants** are Spanning Source, Saab, C. Patel, N. Patel, and iSourceUSA. The Processor Defendants secured the merchant accounts used to

process consumers' payments for the technical support services, and they fronted for the enterprise to consumers and consumer protectors in the U.S., including law enforcement, so that they could continue their scheme.

### **B. The Common Enterprise**

Through case proceedings and Defendants' own filings, testimony, and discovery responses, Plaintiffs received additional facts and information regarding Defendants' technical support services scheme, the corporate and individual entities operating the scheme, and the extent of these entities' interrelatedness and cooperation towards a common goal. The following non-exhaustive list of facts and information, coupled with Plaintiffs' allegations in the original Complaint, form the factual basis for Plaintiffs' Amended Complaint:

1. Defendants' technical support services enterprise was conceived in 2011 and began operations in 2012, much earlier than Plaintiffs initially believed;
2. According to his own declaration, A. Gagneja wanted to expand his technical support services operations to the U.S. Through a mutual business associate, A. Gagneja convinced Bartolotta, a Connecticut resident, to help him establish the "U.S. front" for the operations. Bartolotta incorporated Innovazion US in 2011 and later C4S-CT, and provided his Essex, CT address to both companies. He also opened several U.S. bank accounts, secured telephone services used by the enterprise, and paid for business expenses, at times using his personal credit cards;
3. Through Innovazion US, A. Gagneja registered and operated several consumer-facing websites used by the enterprise—the first was [www.click4support.net](http://www.click4support.net), registered in July 2011. Through Innovazion India, A. Gagneja also hired, trained, monitored, and paid the India-

based telemarketers who interacted with U.S. consumers, including the sales personnel and technical support “specialists”;

4. As part of their agreement, A. Gagneja instructed Bartolotta to secure a merchant account to process consumer payments for the technical support services. Bartolotta was initially unable to secure a viable merchant account. A. Gagneja then turned to another business associate, who introduced him to Saab. They agreed to become business partners;

5. On May 18, 2012, Spanning Source and Innovazion US entered into an agreement involving the sale of technical support services. They then conducted their business through a maze of interrelated entities that involved the original Defendants and the new Defendants, Innovazion India, A. Gagneja, and R. Gagneja;

6. Pursuant to the May 18, 2012 agreement, Defendants apportioned among themselves the duties and responsibilities for running the enterprise. Original Defendants Innovazion US, C4S-CT, and Bartolotta and new Defendants Innovazion India, A. Gagneja, and R. Gagneja (the Provider Defendants) marketed, sold, and fulfilled the technical support services from call centers in India. In turn, original Defendants Spanning Source, Saab, C. Patel, N. Patel, and iSourceUSA (the Processor Defendants) secured a series of merchant accounts in the U.S. that were used to process millions of dollars of consumer payments for the technical support services. Defendants began selling technical support services and processing consumer payments in June 2012;

7. During at least June 2012 through September 2015, the Processor Defendants secured at least six merchant accounts in the names of Spanning Source and iSourceUSA—using

the fictitious names “Click4Support” and “Uber Tech Support” alone.<sup>1</sup> The Processor Defendants used these merchant accounts to process all consumers’ payments to the Provider Defendants. The estimated gross processing volume for these merchant accounts is at least \$31 million,<sup>2</sup> which is much greater than Plaintiffs’ initial estimate of \$17.9 million because it incorporates additional information received through discovery;

8. By agreement among the Defendants, the Processor Defendants also established and maintained several U.S. bank accounts in the names of Spanning Source and iSourceUSA. These accounts were used to receive the proceeds from the sale of Defendants’ technical support services, pay business expenses for their enterprise, and distribute the proceeds among the Defendants. As noted above, Bartolotta also established and maintained several U.S. bank accounts, at least one of which was used similarly by the enterprise. Bartolotta, Saab, C. Patel, N. Patel, and A. Gagneja were authorized signers on one or more of these accounts;

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<sup>1</sup> The Processor Defendants also secured merchant accounts using the fictitious names “Click4Fix,” “CleanandFastPC,” “Ace,” and “Celox.”

<sup>2</sup> The proper measure of equitable monetary relief in this matter is the consumers’ gross payments to Defendants (*i.e.*, Defendants’ gross processing volume) minus any money returned to consumers (*i.e.*, through refunds and chargebacks). *See, e.g., FTC v. NHS Sys., Inc.*, 936 F. Supp. 2d 520, 537 (E.D. Pa. 2013) (holding “Defendants [ ] joint[ly] and severally liable for equitable monetary relief” equal “to the amount of customer’s net loss, minus any amount that was already returned to the consumers”); *FTC v. Davison Assocs., Inc.*, 431 F. Supp. 2d 548, 560 (W.D. Pa. 2006) (holding that “[a]ncillary equitable relief may take the form of disgorgement of the full amount lost by customers, without regard to defendant’s profits” and awarding an amount equal to the “revenues earned by defendants”) (citing *CFTC v. Am. Metals Exchange Corp.*, 991 F.2d 71, 77 (3d Cir. 1993); *FTC v. Febre*, 128 F.3d 530, 537 (7th Cir. 1997); *FTC v. Medicor LLC*, 217 F.Supp.2d 1048, 1057-58 (C.D. Cal. 2002)); *FTC v. Check Investors, Inc.*, Civil Action No. 03-2115 (JWB), 2005 U.S. Dist. LEXIS 37199, at \*3-4 (D. N.J. July 18, 2005), *aff’d* 502 F.3d 159, 175 (3d Cir. 2007) (“The FTC is entitled to judgment against Defendants, jointly and severally, in the amount [equal to] the net consumer injury caused by them, even though this amount may exceed their unjust enrichment.”). Here, Plaintiffs’ \$31 million estimate represents consumers’ gross payments to Defendants and does not yet take into account any refunds or chargebacks received by consumers. Plaintiffs continue to gather and analyze relevant information in order to provide a more accurate measure of equitable monetary relief.

9. By agreement among the Defendants, the Processor Defendants reviewed and responded to (a) consumer chargebacks, (b) consumer complaints and refund requests submitted by consumers directly and through the Better Business Bureau, and (c) notices and inquiries from law enforcement agencies, including several attorneys general offices. As noted in the original Complaint, Bartolotta also handled consumer complaints on behalf of the enterprise;

10. By agreement among the Defendants, the Processor Defendants hired at least four “refund clerks” to help deal with the mounting number of consumer complaints and refund requests. Saab personally reviewed and responded to consumer complaints and, according to his own testimony during the PI hearing, he continued to be involved in the process as the “escalation point [person].” Similarly, C. Patel acted as the “HR manager” and supervised the refund clerks. The Processor Defendants eventually housed these employees in their Bensalem, PA office;

11. By agreement among the Defendants, the Processor Defendants also hired up to four U.S.-based technical support personnel to help deal with consumer-related issues. They also housed these employees in their Bensalem, PA office;

12. Bartolotta, Saab, N. Patel, C. Patel, and A. Gagneja were aware of and/or personally involved in handling chargebacks, complaints, and other consumer-related issues. On at least one occasion, Saab, N. Patel, C. Patel, and A. Gagneja formulated a “chargeback reduction and business process improvement plan” for their enterprise;

13. A. Gagneja’s direct involvement in this enterprise is substantial. He is an owner and/or officer of Innovazion US, Innovazion India, C4S-CT, and iSourceUSA. He is an authorized signer on and has access to a number of Defendants’ U.S. bank accounts. He has instructed one or more of the original Defendants to secure merchant accounts for the enterprise.

As noted above, he was involved in Defendants' consumer-facing websites and telemarketing force. Moreover, he analyzed consumer complaints, refund requests, and chargebacks generated by the operations. Along with Saab, N. Patel, and C. Patel, he formulated Defendants' "chargeback reduction and business process improvement plan";

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

15. By agreement, Defendants divided among themselves the proceeds generated by their enterprise. Innovazion India, A. Gagneja, and R. Gagneja received millions of dollars of these proceeds through numerous wire transfers initiated by the U.S-based Defendants.

### **III. THE AMENDED COMPLAINT**

The facts and information detailed above warrant adding Innovazion India, A. Gagneja, and R. Gagneja as Defendants in this matter. They also support Plaintiffs' two new counts, as described below.

#### **A. New Count V: Credit Card Laundering, 16 C.F.R. § 310.3(c)**

The Processor Defendants' practice of processing consumers' payments related to telemarketing transactions between consumers and the Provider Defendants is also known as "credit card laundering," a deceptive practice prohibited by the Telemarketing Sales Rule ("TSR"), 16 C.F.R. § 310.3(c). The Provider Defendants are also liable under the same TSR provision for causing the Processor Defendants to process such payments and for accessing the credit card system through their affiliation with the Processor Defendants. Plaintiffs allege these violations in new Count V.

**B. New Count VI: Assisting and Facilitating, 16 C.F.R. § 310.3(b)**

The Processor Defendants’ practices of providing merchant account services, establishing and maintaining U.S. bank accounts, and reviewing and responding to consumer-related issues (*i.e.*, chargebacks, complaints, refund requests, law enforcement notices and inquiries) on behalf of the Provider Defendants—while possessing the requisite knowledge of unlawful telemarketing practices committed by the Provider Defendants (*e.g.*, by reviewing and responding to consumer-related issues)—violate the TSR provision against assisting and facilitating others’ TSR violations, 16 C.F.R. § 310.3(b).<sup>3</sup> Plaintiffs allege this violation in new Count VI.

**C. Plaintiffs Seek Equitable Monetary Relief.**

Finally, Plaintiffs State of Connecticut and Commonwealth of Pennsylvania have decided to remove original Counts VI and VIII and other references in the original Complaint pertaining to civil penalties in order to clarify further that Plaintiffs do not seek such relief. As noted, Plaintiffs remain focused on obtaining equitable monetary relief in this matter, including restitution for the thousands of consumer victims in this case and the disgorgement of Defendants’ ill-gotten gains.

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<sup>3</sup> In order to show the “substantial assistance or support” required under this TSR provision:

The FTC must identify something more than ‘casual or incidental’ help to the telemarketer, but does not have to show a ‘direct connection’ between the assistance and the misrepresentation for an entity to be liable.... Here, providing [the other defendants] with two merchant accounts was essential to the success of the scheme. Absent these accounts, the [other defendants] would have been unable to process credit card payments. Thus, as a matter of law, [the defendant] substantially assisted the [other defendants].

*FTC v. HES Merch. Servs. Co.*, Case No: 6:12-cv-1618-Orl-22KRS, 2014 U.S. Dist. LEXIS 171292, at \* 22-23 (M.D. Fla. Nov. 18, 2014).

#### IV. LEGAL STANDARD AND ARGUMENT

Rule 15 provides that “a party may amend its pleading [with] the court’s leave” and that “[t]he court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2). Thus, the court has the discretion to grant or deny a request for leave to file an amended pleading. *See Zenith Radio Corp. v. Hazeltine Research, Inc.*, 401 U.S. 321, 330, 91 S. Ct. 795, 28 L. Ed. 2d 77 (1971) (“It is settled that the grant of leave to amend the pleadings pursuant to Rule 15(a) is within the discretion of the trial court.”); *see also Cureton v. Nat’l Collegiate Athletic Ass’n*, 252 F.3d 267, 272 (3d Cir. 2001) (“[A] motion for leave to amend a complaint [is] addressed to the sound discretion of the district court.”).

“Leave to amend must generally be granted unless equitable considerations render it otherwise unjust.” *Arthur v. Maersk, Inc.*, 434 F.3d 196, 204 (3d Cir. 2006) (citing *Foman v. Davis*, 371 U.S. 178, 182 (1962) and *Lorenz v. CSX Corp.*, 1 F.3d 1406, 1414 (3d Cir. 1993)). “In the absence of substantial or undue prejudice, denial [of a motion to amend] must be grounded in bad faith or dilatory motives, truly undue or unexplained delay, repeated failure to cure deficiency by amendments previously allowed or futility of amendment.” *Heyl & Patterson Int’l, Inc. v. F.D. Rich Housing of V.I., Inc.*, 663 F.2d 419, 425 (3d Cir. 1981) (citing *Foman*, 371 U.S. at 182). Given the liberal standard under Rule 15(a), “the burden is on the party opposing the amendment to show prejudice, bad faith, undue delay, or futility.” *Chancellor v. Pottsgrove Sch. Dist.*, 501 F. Supp. 2d 695, 700 (E.D. Pa. 2007).

Here, allowing Plaintiffs to file the Amended Complaint would serve justice and promote judicial efficiency. As detailed above, the Amended Complaint seeks to add three new Defendants that, along with the original Defendants, were significantly involved in planning and perpetrating the technical support services scheme that has victimized thousands of consumers.

The Amended Complaint also seeks to add two new counts based on conduct and practices that the original Defendants and new Defendant A. Gagneja (who controls new Defendant Innovazion India) have admitted in their own court filings, testimony, and discovery responses. The Amended Complaint also removes allegations pertaining to civil penalties; this would further clarify the equitable nature of the monetary relief that Plaintiffs seek, ultimately preserving both judicial and litigation resources.

There is no undue delay, bad faith, or dilatory motive by Plaintiffs. Plaintiffs seek to file the Amended Complaint within the time allowed by the Court to file amended pleadings, (Doc. 85), and it is supported by facts and information uncovered by Plaintiffs and provided by Defendants.

Moreover, there will be no substantial or undue prejudice to the original Defendants. The issue of prejudice requires a court to focus on the hardship to the defendants if the amendment were permitted; specifically, the court has to consider “whether allowing an amendment would result in additional discovery, cost, and preparation to defend against new facts or new theories.” *Cureton*, 252 F.3d 267, 272 (3d Cir. 2001) (affirming the district court’s denial of a motion to amend, made after summary judgment was directed in favor of the non-moving party, in part because “the proposed amendment would essentially force the [non-moving party] to begin litigating the case again”); *cf. Cardone Indus., Inc. v. Honeywell Int’l, Inc.*, Civil Action No. 13-4484, 2014 U.S. Dist. LEXIS 94259, at \*14-15 (E.D. Pa. July 11, 2014) (finding that no undue prejudice exists where the factual basis for the amendments were known to the non-moving party and discovery had not yet concluded). Here, Plaintiffs seek to amend the pleading to add three new Defendants known to and associated with the original Defendants. Similarly, Plaintiffs seek to add two new claims and allegations based on conduct and practices that

Defendants have admitted and based on facts and information received, to a large extent, from the Defendants themselves. Given that discovery will continue for a few more months, the time is ripe for the parties to develop these facts and narrow the issues for litigation.

Finally, there will be no futility resulting from Plaintiffs' Amended Complaint. In the context of a motion to amend, "[f]utility' means that the complaint, as amended, would fail to state a claim upon which relief could be granted." *In re Burlington Coat Factory Sec. Litig.*, 114 F.3d 1410, 1434 (3d Cir. 1997). Therefore, the court may refuse to allow an amendment that fails to state a cause of action because it would not survive a motion to dismiss. *See, e.g., Massarsky v. General Motors Corp.*, 706 F.2d 111, 125 (3d Cir.), *cert. denied*, 464 U.S. 937 (1983) ("The trial court may properly deny leave to amend where the amendment would not withstand a [Rule 12(b)(6)] motion to dismiss."). Here, the Amended Complaint states viable claims against all Defendants. As to Plaintiffs' two new counts, these claims arise from conduct and practices that Defendants admittedly engaged in and that, based on a plain reading of the TSR, violate the prohibitions against credit card laundering, 16 C.F.R. § 310.3(c), and assisting and facilitating, 16 C.F.R. § 310.3(b).

## **V. CONCLUSION**

For these reasons, Plaintiffs respectfully ask that the Court grant leave to file the attached Amended Complaint for Permanent Injunction and Other Equitable Relief. Attached is a proposed order.

Respectfully Submitted,

Dated: March 15, 2016

/s/ Fil M. de Banate  
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OFFICE OF ATTORNEY GENERAL

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FEDERAL TRADE COMMISSION, *et al.*,

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**ORDER GRANTING PLAINTIFFS’ MOTION FOR LEAVE TO FILE AMENDED  
COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

AND NOW, on this \_\_\_\_ day of \_\_\_\_\_, 2016, upon consideration of  
Plaintiffs’ Motion for Leave to File Amended Complaint for Permanent Injunction and Other  
Equitable Relief, it is hereby ORDERED that Plaintiffs’ Motion is GRANTED.

BY THE COURT:

\_\_\_\_\_  
Stewart Dalzell, J.