WILLARD K, TOM General Counsel

RUSSELL DEITCH CHRISTINE TODARO Federal Trade Commission, Room 288 600 Pennsylvania Ave., N.W. Washington, DC 20580 202-326-2585, 202-326-3711, <u>rdeitch@ftc.gov</u>, <u>ctodaro@ftc.gov</u> 202-326-3395 (facsimile)

PAUL J. FISHMAN United States Attorney SUSAN J. STEELE Chief, Civil Division United States Attorney's Office 970 Broad Street, Suite 700 Newark, NJ 07102 (973) 645-2920 (973) 645-2702 (facsimile) Attorneys for Plaintiff

10c+ 568 (NLH-KMW)

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

FEDERAL TRADE COMMISSION,	Case No.
Plaintiff,	
v.	33 000
INDEPENDENT MARKETING EXCHANGE, INC., a corporation, also d/b/a National Data Management, N.D.M., Global Mailing Services, G.M.S., Independent Mailing Services, Independent Mailing Services, Inc., I.M.S., Independent Shoppers Network, Independent Shoppers, Success At Home, Success-At-Home Mailing, IMEX, IMEX, Inc., and Continental Publishing Company, and	ECEIVED TWALSH. OLENK B -2 P 2: 35
WAYNE J. VERDERBER II, a/k/a Wayne Verd and Brian West, individually and as an officer of INDEPENDENT MARKETING EXCHANGE, INC.,	
Defendants.	

COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission ("FTC"), for its Complaint alleges:

- 1. The following are named parties to this action:
 - Plaintiff FTC is an independent agency of the Government of the United States of America. Its address is 600 Pennsylvania Avenue, N.W., Washington, DC 20580.
 - B. Defendant Independent Marketing Exchange, Inc. is a New
 Jersey corporation with its principal place of business at 55 S.
 Leeds Point Road, Absecon, New Jersey 08201.
 - C. Defendant Wayne Verderber II is the President of Independent
 Marketing Exchange, Inc. His principal place of business is 55
 S. Leeds Point Road, Absecon, New Jersey 08201.

2. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants' acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), in connection with the marketing of work-at-home and other money-making opportunities.

JURISDICTION AND VENUE

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

4. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c), and 15 U.S.C. § 53(b).

PLAINTIFF

5. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce.

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

DEFENDANTS

7. Defendant Independent Marketing Exchange, Inc., also doing business as National Data Management, N.D.M., Global Mailing Services, G.M.S., Independent Mailing Services, Independent Mailing Services, Inc., I.M.S., Independent Shoppers Network, Independent Shoppers, Success At Home, Success-At-Home Mailing, IMEX, IMEX, Inc., and Continental Publishing Company, is a New Jersey corporation with its principal place of business at 55 S. Leeds Point Road, Absecon, New Jersey 08201. Independent Marketing Exchange, Inc. transacts or has transacted business in this district and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Defendant Independent Marketing Exchange, Inc. has advertised, marketed, distributed, or sold work-at-home and other money-making opportunities to consumers throughout the United States.

8. Defendant Wayne J. Verderber II, also known as Wayne Verd and Brian West, is the President of Independent Marketing Exchange, Inc. At times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. Defendant Wayne Verderber resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district and throughout the United States.

COMMERCE

9. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in

4

Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS' BUSINESS ACTIVITIES

10. Since at least 2000, and continuing thereafter, Defendants have advertised, offered for sale, and sold a variety of purported work-at-home and other money-making opportunities to consumers throughout the United States through the Internet and other means. These opportunities include, but are not limited to, an envelope mailing opportunity, a postcard mailing opportunity, and a mystery shopper opportunity. Defendants represent that consumers are likely to earn substantial income from purchasing one of these three opportunities.

Envelope Mailing Opportunity

11. To induce consumers to purchase Defendants' envelope mailing opportunity, Defendants have disseminated or caused to be disseminated advertisements on the Internet and elsewhere, including, but not necessarily limited to, the attached Exhibit A. For example, one Internet advertisement contains the following statements and depictions, among others:

Earn \$2.00 for every envelope you process and mail!

Would you like to make an extra **\$200, \$400, \$600** or more working from Home Weekly? ***

We'll send you a check every Friday

for work done that week from your home! GUARANTEED!

\$\$\$ PROBLEMS...CONSIDER THEM SOLVED!

Just a few hours of your spare time is all you need to start earning big weekly paychecks.

(Exhibit A, p. 1)(Emphasis in original).

12. Defendants charge consumers at least \$22.00 for the envelope mailing opportunity.

13. After paying for the envelope mailing opportunity, consumers receive a package of materials from Defendants. It is only then, after paying for the opportunity and receiving the package of materials that consumers learn their ability to earn money depends on recruiting others looking for work-at-home jobs through the posting of flyers or other advertising.

14. The package does not contain any envelopes to stuff, or names and addresses where consumers should send the envelopes. Instead, Defendants provide consumers with flyers advertising work-at-home jobs. Defendants instruct each consumer to include the consumer's mailing address on each of the flyers.

6

Defendants further instruct consumers to then post or place the flyers on bulletin boards, trees, and telephone poles.

15. The flyers state that individuals interested in receiving the details and/or a job application for the advertised work-at-home opportunities should send a self-addressed, stamped envelope to the consumer's address listed on the flyer.

16. If a consumer does receive a self-addressed, stamped envelope from an individual interested in the work-at-home opportunities advertised on the flyers, the Defendants will not pay the consumer any money until the consumer completes additional requirements. First, Defendants require that the consumer record the name and address of the individual. Second, the Defendants require that the consumer mail them that record, the outer mailing envelopes that the selfaddressed, stamped envelopes came in, the self-addressed, stamped envelopes themselves, as well as a payment voucher.

17. In numerous instances, consumers do not earn substantial income from Defendants' envelope opportunity. In fact, Defendants' representation that consumers are likely to earn substantial income from the envelope opportunity is false and/or unsubstantiated.

Postcard Mailing Opportunity

18. To induce consumers to purchase Defendants' postcard mailing

7

opportunity, Defendants have disseminated or caused to be disseminated advertisements on the Internet and elsewhere, including, but not necessarily limited to, the attached Exhibit B. For example, one Internet advertisement contains the following statements and depictions, among others:

Home Mailers Needed Immediately -

Earn Weekly Checks From Home

Mailing Our Postcards.

Say Goodbye to Money Problems

*** Enormous Earning Potential

How Much Money Can I Really Expect to Make?

It's really up to you! We regularly send out large checks to our mailers. For example, one of our home-mailers made \$500, another made over \$1,000 – and that's in one week! We pay so much because we want you to keep mailing!

Just Think:

Only 1 sale from each offer per day = <u>\$448.00 per week!</u>

Only 2 sales from each offer per day = <u>\$896.00 a week!</u>

Only 3 sales from each offer per day = <u>\$1,344.00 a week!</u>

(Exhibit B, p.1)(Emphasis in original).

19. Defendants charge consumers between \$44.00 and \$64.00 for the postcard mailing opportunity.

20. After paying for the postcard mailing opportunity, consumers receive a package of materials from Defendants. The package includes postcards, brochures, and some pre-printed address labels. The postcards and brochures advertise Defendants' work-at-home and other money-making opportunities. Defendants' materials instruct consumers to mail the postcards or brochures or to use other methods to advertise Defendants' work-at-home and other moneymaking opportunities. Consumers earn money only upon a completed sale of one of Defendants' work-at-home or other money-making opportunities. Defendants tell consumers that they will receive between \$14 and \$34 from each sale of Defendants' work-at-home or other money-making opportunities.

21. In numerous instances, consumers do not earn substantial income from Defendants' postcard mailing opportunity. In fact, Defendants' representation that consumers are likely to earn substantial income from the postcard mailing opportunity is false and/or unsubstantiated.

Mystery Shopper Opportunity

22. A mystery shopper is someone who visits an establishment, typically

a retail store, bank, or restaurant, for the purpose of observing and measuring customer service, product quality and the environment of the establishment in general. The mystery shopping company responsible for the shopping program provides its shoppers with details about what to observe during their mystery shopping visits. The shoppers then complete reports, often using an online form, after leaving the establishment.

23. To induce consumers to purchase Defendants' mystery shopper opportunity, Defendants have disseminated or caused to be disseminated advertisements on the Internet and elsewhere, including, but not necessarily limited to, the attached Exhibit C. For example, one Internet advertisement contains the following statements and depictions, among others:

Our company currently handles 1,000's of retail establishments and [sic] are looking for a limited number of interested person [sic] in each region of the country to become Secret Mystery Shoppers. If you are neat and responsible, you can get paid for shopping around your own town.

The businesses you will shop for will contact you for assignments directly, by calling you or sending you a letter in the mail.

If you are sincerely interested in getting paid to shop, act now! You'll be enrolled in the Independent Shoppers Network, and immediately get started in this exciting profession. There is [*sic*] No experience is needed – We will provide you with everything you need to make this a potential part-time income for life.

We have found that most *Secret Mystery Shoppers* earn \$20 to \$25 an hour depending on how fast they shop.

Don't pass this great opportunity to become a well-paid Secret Mystery Shoppers [*sic*].

(Exhibit C, pp. 1-2)(Emphasis in original),

24. Defendants charge consumers \$34.00 for the mystery shopper opportunity.

25. After paying for the opportunity, consumers receive a package of materials from Defendants. The package includes a pre-printed list of companies and addresses, and instructions for the consumer to contact the companies directly and ask for job applications. For the first time, consumers learn that, rather than being contacted directly by businesses hiring mystery shoppers, consumers will

have to contact the companies themselves and pursue employment. In other words, consumers, on their own, have to contact one or more of the listed companies, find out if the listed companies are hiring mystery shoppers, complete any required job applications, get hired, and obtain an assignment to do mystery shopping.

26. Defendants do not provide everything consumers need to start work immediately as mystery shoppers in their towns.

VIOLATIONS OF THE FTC ACT

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

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

COUNT I

DECEPTIVE CLAIMS REGARDING INCOME

29. In the course of marketing, promoting, offering for sale, and selling work-at-home opportunities, Defendants represent, expressly or by implication, that consumers are likely to earn substantial income.

30. The representation set forth in Paragraph 29 is false, or was not substantiated at the time the representation was made, or both.

31. Therefore, the making of the Defendants' representation as set forth in

Paragraph 29 of this Complaint constitutes a deceptive act or practice in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT II

MISREPRESENTATIONS REGARDING MYSTERY SHOPPER JOBS

32. In the course of marketing, promoting, offering for sale, and selling the mystery shopper opportunity, Defendants represent, expressly or by implication, that:

- a. businesses will contact consumers directly with assignments
 upon consumers purchasing the mystery shopper opportunity;
 and
- consumers who purchase the mystery shopper opportunity
 receive everything they need to start work immediately as
 mystery shoppers in or around their town.
- 33. In truth and in fact:
 - a. businesses will not contact consumers directly with assignments upon consumers purchasing the mystery shopper opportunity;
 and
 - b. consumers who purchase the mystery shopper opportunity do not receive everything they need to start work immediately as

mystery shoppers in or around their town.

34. Therefore, the Defendants' representations as set forth in Paragraph 32 of this Complaint are false and misleading and constitute deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

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

THIS COURT'S POWER TO GRANT RELIEF

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

PRAYER FOR RELIEF

Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:

A. Award Plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including but not limited to, temporary and preliminary injunctions, an order freezing assets, and expedited discovery;

B. Enter a permanent injunction to prevent future violations of the FTC
 Act by Defendants;

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

D. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

15

Respectfully submitted,

WILLARD K. TOM General Counsel

Dated: February 1, 2010

RUSSELL DEITCH CHRISTINE TODARO Federal Trade Commission 600 Pennsylvania Ave., N.W. Washington DC 20580

PAUL J. FISHMAN United States Attorney SUSAN J. STEELE Chief, Civil Division United States Attorney's Office 970 Broad Street, Suite 700 Newark, NJ 07102 (973) 645-2920 (973) 645-2702 (facsimile)

Attorneys for Plaintiff.

Page 1 of 6

Earn \$2.00 for every envelope you process and mail!



Home

This is the Real Work From Home we've been offering for over 10 Years! NOT An Envelope Stuffing Program (Scams).. NO Buying Envelopes or Stamps, NO Expensive Mailings, NO Mailing Lists to Buy, NO MLM or Phone Sales... Just Weekly Checks! Would you like to make an extra \$200, \$400, \$600 or more working from Home Weekly?

**Apply Now *



Real Envelope Work From

--- About Us -- Tostimonials-- O.B.A

Homet This is Not an Envelope Stuffing Program, but the REAL work at

home jobs that you hear about. <u>click here to See how much</u> <u>555 You can makel</u>

We are Provid members of:







. Wowi With only

Envelopes per day You'll have a daily income of:

\$

Or a Weekly income of:

FGALCHATE

Contact Us

Other work at home job

NOW YOU COULD EARN UP TO \$1,200.00 OR MORE WEEKLY FROM HOME!

National Data Management 325 Jimmie Road, RD Box 102 Galloway NJ 08205

(619) 692-2554.

If you can gather and compile names from home ...YOU CAN GET PAID <u>Huge</u> checks every week to work at home! NOT an Envelope Stuffing Scam...but a real home-based job opportunity. We know that 95% of all opportunities you see are scams. But, THIS IS THE REAL HOME ENVELOPE WORK YOU ALWAYS HEAR ABOUT.



We'll send you a check every Friday for work done that week from your home! <u>GUARANTEED</u>!

\$\$\$ PROBLEMS...CONSIDER THEM SOLVED!

How would you like to make an extra check every week for a few hours of work from home? It's not too good to be true. We know, because we have been paying people at home for years. You can Earn extra money working at home as a member of our successful Work At Home tearn. <u>No more worries over inflation, recession, bills, daycare and rising gas</u> <u>costs.</u> If you are looking for easy extra income, to relieve financial pressures, this is it! You owe it to yourself to investigate our offer. <u>See How Much Money Just One of Our Home-</u> Workers Made in a Month!

WORK AT HOME, FULL OR PART TIME!

Just a few hours of your spare time is all you need to start earning big weekly paychecks. <u>There is no limit</u> to the number of names you can send for payment. Once you register, you may work for National Data Management for as long as you like. You simply process the names you receive, according to our instructions, and send them to us for payment. <u>YOU</u> <u>WILL EARN \$2.00 FOR EACH ENVELOPE YOU SUBMIT TO US</u>. Your checks will be mailed every Friday. It's that easy! You will receive all your pre-addressed inquiry envelopes from prospects with postage stamps already afixed.

REMEMBER Your job is to simply compile names and addresses:

You will NOT pay for any postage.

You will NOT have to sell anything to make \$2.00 per envelope.

Page 2 of 6

opportunities:





You will NOT have to talk to anyone or make any phone calls..

EARNINGS QUICKLY INCREASE!

MAIL		MONEY
250		\$500
500		\$1,000
1,000		\$2,000
2,000	-	\$4,000
PROCESS	-	\$EARN

NO PRIOR EXPERIENCE REQUIRED

This program is designed especially for people with little or no business experience. We give you complete assistance through every step to ensure your success. All business can be done by mail from your home town — You can *start the same day* you receive your supplies. Don't Delay!

\$2.00 PER ENVELOPE!!

National Data Management (N.D.M.) is a known cornerstone in the mail-order industry for

over 10 years. We are currently seeking independent Home-Workers to help us gather names and addresses to meet our clients' demands. We will pay \$2.00 for each envelope you submit to us, and checks are mailed out every week!

This job will *not* require you to sell anything, buy anything, or spend money on supplies or advertising. Your job is simply to compile names and addresses of people who are interested in making money in their spare time. It couldn't be easier - after all, we could all use a little more money!

Remember, you will be paid \$2.00 for each name you send us. Best of all, we never set any limits on your earnings. You can work as little or as much as you want. Plus, you will set your own hours and work from anywhere you like! You'll get paid each Friday for the work you've done that week. It's that simple.

We need name compilers immediately to fill our clients' demands. Please look over this information carefully and decide if working at home is for you. If so, let National Data be the company signing your weekly checks. Send your completed application form to us today!

Looking forward to hearing from you,

Pat Shields

Human Resources Director[®] National Data Management 1-619-692-2524 sale@globalmailing.net

P.S.- This is a REAL opportunity for YOU to MAKE EXTRA MONEY EVERY WEEK. We just paid one of our Oregon Home-Worker's over <u>\$1,200,00</u>...all for a few hours a week of

working from HOME!

Page 3 of 6

THINK OF THE BENEFITS!

- Big city or small town it doesn't matter!
- Work where you want, when you want!
- Your friends and family can help!
- You are the Boss!

There Are:

- NO Chain letter or pyramid schemes
- NO Personal commission selling or telemarketing
- NO Pornographic or objectionable mailings
- NO Quotas, minimums, or limitations of any kind
- NO Spending on advertising, supplies ... EVER!

Letters From Home-Workers...

The following are testimonials from some of our many happy work-athome compilers for our company!

NDM,

Thank You! National Data Management was the first company that paid me what they promised. I have been paid every weak on time an a lot. I made <u>\$1,200,00</u> last month alone. Thank you. You really have come through when I needed it the most. Our next batch of envelopes is on the way

C. Marshali

-Oregon

Dear N.D.M.

Please send more supplies with my next check,

I'm going for 1000 names this week!

- Kevin Small

Dear Data Management,

I was wondering if you could send an application to

my sister in Georgia ... with two small children and a full time job, she spends most of what she earns on daycare. I think this job would be perfect for her. I myself am saving hundreds each week working at home full time - my kids are even helping me!

Thanks and God Bless -

Susan Jacobs

Baltimore, MD

Dear National Data,

You were the first company I found that actually paid what was promised. Thank you for the opportunity — I didn't expect to get paid so soon. Joanne Riley

Chicago, IL

USE YOUR SPARE TIME TO EARN THE MONEY YOU DESERVE.

By boosting your financial situation, you can start turning your dreams into realities. We can help you reach these dreams, but you must take the first step. Fill out the application form below and mail it today. We are ready to send your first of many big weekly checks. We'll even show you how you can use the same program and <u>earn</u> <u>up to \$3.00 per envelope</u> with a valid address that you submit to us!

APPLY TODAY AND SECURE YOUR POSITION AS AN INDEPENDENT HOME-WORKER

The staff at National Data Management would like to invite you to join our team of Home-based name compilers. This is your opportunity to work with a reputable, long-standing company. We are committed to providing honest home-based employment. If you are willing to work from home during your spare time, we can guarantee you large, steady paychecks. Remember, you have complete control over your earnings — the sky is the limit!

Although we would like to send your supplies and home-compiling instructions right away, we must first be assured that you are serious about working with us. Therefore, we do require a one-time, refundable application fee of \$19.00. This is the only money you will ever have to invest to start receiving big checks every week. Remember, you may work with us for as long as you like, without ever being obligated in any way. As a bonus, your application fee will be refunded after you submit your first 200 names.



We are so positive that you will be happy with your earnings, we guarantee it! Our success depends on your complete satisfaction. If after trying it for 90 days, you find yourself unhappy with this program, just write to us for a full, 100% "No Questions Asked" refund of your full registration fee. Now that's a guarantee!

To ensure that our current and future home-workers receive the company support and speedy payment they deserve, we must set certain limits on the number of name compilers we employ. This maintains a high level of quality within our organization. It also allows us to offer home-based employees our "no limit" payment policy. This unlimited opportunity is currently available in your area. Act now and be guaranteed a position with us for as long as you like.

FILL OUT THE APPLICATION FORM BELOW AND GET STARTED MAKING MONEY FROM HOME EVERY WEEK!

	Application payment Methods:					
	Credit Card Orders: Fill Out Credit Card Information below, along with your mailing information, and Click Submit					
	VISA MasterCard					
	By Mail: Check or Money Orders:					
	Print This Form & Mall With Payment to: N.D.M., 325 E. Jimme Leeds Rd. PMB #102 Galloway, NJ 08205					
	 YES, PLEASE ENROLL ME AS A MEMBER OF YOUR HOME COMPILING TEAM! Enclosed is \$29.00 \$19.00 plus \$3 shipping and handling 					
	(\$22). I understand that this registration fee will be refunded to me after i compile my first 200 names.					
	First Name: Last Name:					
	Address:					
	City:					
	State:					
	Zip:					
ł	Phone (optional):					

Case 1:10-cv-00568-NLH -KMW Document 1 Filed 02/02/10 Page 22 of 28

Credit Card Orders:	
Visa/MC/AMEX Account #	
Exp. Date: Month 1 🔮 Ye	ar 2009 🖟
Where did you hear about us? Please Choose Or	
(Please click submit only once. Please wai confirmation to appear. It may take up one Submit	for your minute.)

Copyright @ 2009 GlobalMailing.Net. All rights reserved, sale@globalmailing.net

N.D.M., 325 E. Jimme Leeds Rd. PMB #102 Galloway, NJ 08205 1-619-692-2524

Site Hosted By A New Jersey Web Design Specialist - JSE Computers

Work from Home Jobs MoneyForMailing.com, Work at Home Mailing Job, Weekly Paychecks Page 1 of 4



Home Sian Un







LMLS 15 S. Loods Pt Rd #4, Leeds Pt, NJ 08220 800-242-0363 ext: 2127

Other Recommended Opportunities

Eam \$7.00 per Envel Processing Mail at Horn



In-Dooth Oetalla on 500 s Companies Hiring Now





Contact dind Click Here To Receive FREE Details ₿y

Mail

- Work At Home Job. Nationwide Availability.
- Easy Workl Great Payl Weekly Checks)
- Work when you want, Part or Full time
- Be in complete control of your earnings)
- No Experience or Special skills needed!



Make Money As A Home Mailer! Mail Our Postcards And Brochures From Home

If you're looking for an honest way to make money at home - look no further. We have been offering legitimate home opportunities for over 10 years. We are currently looking for Home mailers right now. Don't believe other companies offering false promises and empty dreams... We are for real. PLEASE FEEL FREE TO CHECK OUR RECORD TO ENSURE WE ARE LEGITIMATE. We have nothing to hide. IMS has a proven work from home system that pays home-mailers on a weekly basis. We're ready to send you a check every week just for helping us promote our offers!

Say Goodbye to Money Problems

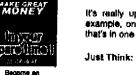
No more stress and worry about bills, inflation, rising gas costs and recession. Our Home-mailing program is a proven way to work from home, without the great cost or obligation of starting your own business. All you do is mail our postcards or brochures with your company code number and personal website on them. For that, you will earn \$14 - \$34 every time we get a response from your efforts. We send you all the postcards, brochures and mailing labels you need and pay you for the work you do each week, it's Guaranteed so enroll now and start making money from home. We can have a check to you in as little as ten days!

Enormous Earning Potential

Our Home mailing Program has three different levels of enrollment. You decide which level you'd like to start at and how much you want to mail. You will make \$14....\$16... even up to \$34! That's per postcard!

$\cdots h$	(1,1,2,2,2,2,2,2,2,2,2,2,2,2,2,2,2,2,2,2	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
	Use our Pay Galculator to see you	r potential earnings)	
r Önly	sple(s) on each of your websites per day - \$ daily.		
	That's an extra income of \$	every weak!	
	Sign Up Now	1 L	

How Much Money Can I Really Expect To Make?



Reled Biz-On

It's really up to you! We regularly send out large checks to our mailers. For example, one of our home-mailers made \$500, another made over \$1,000 - and that's in one week! We pay so much because we want you to keep mailing!

Only 1 sale from each offer per day = <u>\$448.00 a weeki</u> Only 2 sales from each offer per day = <u>\$896.00 a weeki</u> Only 3 sales from each offer per day = \$1,344.00 a week!

Exhibit B

http://www.moneyformailing.com/

Case 1:10-cv-00568-NLH -KMW Document 1 Filed 02/02/10 Page 24 of 28

Work from Home Jobs MoneyForMailing.com, Work at Home Mailing Job, Weekly Paychecks

Page 2 of 4

Can Price Un Shops

Mystary Shoooino Joba Ayellable in Your Areat

Remember, you're in control. Your income is depends on how many postcards you want to prepare and mail. If you want to make more money, simply mail more postcardst

A Company You can Trust

Rest assured, this is an trongst opportunity to work at home. MoneyForMalling.com is a long-standing, respected member of the mailing industry. Our reputation is very important to us, and we believe in telling the truth. That's just one reason that we are proud members Web Assured, Netcheck, and members of our Local Chamber Of Commerce. We are for real.







What Makes Us Different

Many other companies say they will pay you for "stuffing envelopes"... but the catch is, they don't send you any supplies ... ever. That's the big difference between those companies and us. At Work from Home MoneyForMailing.com, we actually send you all the postcards, labels, brochures and supplies you need to get started, so you can start mailing that very same day. That's a promise you can believe!

WE HAVE MULTIPLE HOTLINE PHONE NUMBERS WITH A DEDICATED SUPPORT STAFF TO ANSWER ALL OF OUR MAILER'S QUESTIONS Never work with any company that doesn't give you their phone numbers. To maintain our high quality levels of customer service, our lives hotline number is available only to our home-mailing team members, and is sent along with your first package of mailing supplies. Our customer service phone number is 1-800-866-2551.

We Send You all the Postcards & Labels You Need to Get Started!

You always know exactly what supplies you're receiving from us, if you carefully read the information that you received from other companies, you will notice that they are very vague on what their package contains. They never say how many of what supplies are included. Not with us. We offer simply work from home.

We do not expect you to run all over town posting fivers, and you will not have to do any advertising. Your job is simply to label, stamp and mail our beautiful fullcolor postcards and brochures with your company code number and your website on them. Then, let us worry about everything efse. Our business is based on paying you to promote our products. No stuffing envelopes, chain letters, or impossible assembly tasks. This is the real thing. For doing the work of labeling and stamping the postcards and brochures, we'll share the profit earned on each one! That's right. You will earn \$14 to \$34 for each sale! Your earnings can really add up, so join our home-mailing team today and start making great money in your spare time!



100% SATISFACTION GUARANTEED!

We are so positive that you will be happy with your earnings, we guarantee it! Our success depends on your complete satisfaction. If at any time you feel that this program is not for you, just return the unused materials within 45 days and we'll rush a refund back to you. With this 100% "No Questions Asked" Money-Back Guarantee, you have absolutely nothing to lose! Click here to <u>Enroll now</u>. See What Our Current Home Mailers Are Saying.

Letters From Our Home-Workers



http://www.moneyformailing.com/

Case 1:10-cv-00568-NLH -KMW Document 1 Filed 02/02/10 Page 25 of 28 Work from Home Jobs MoneyForMailing.com, Work at Home Mailing Job, Weekly Paychecks Page 3 of 4

"Thank You! I'm finally making money from home. All I'm doing is mailing their post cards and making money week after week. I'm almost embarressed to get paid for doing basically nothing! "

~ Kathleen A., NJ

"HI, this is Sheryl Boyd, I want to thank you for giving me the honest work I was looking for. I admit, I was skeptical at first, but I figured with your money back guarantee I had nothing to lose. And you have not let me down.

and the second second

Thank You & God Bless"

~S. Boyd, FL

Work from Home Moneyformalling.com,

"It's so refreshing to know there's really someone there to talk to if I need help...Please thank Jenny in your customer service department for me."

~K. Waters, NJ

Dear Sir."Thank you E.M.S., every envelope stuffing company that promised me \$1,000s weekly let me down...I learned the hard way ...they were nothing but tricks or lilegal scams. Not only did you deliver what you promised but now I really receive a weekly check for working from home. My checks have gotten bigger every week for the last six weeks straight. I'm ready to double my weekly mailing amount. The money is too good and too easy to pass up."

P.Madone,CA

"...and thanks for sending all the supplies and materials you promised. Now that I've proved your model works, I have set a goal of 1,000 mailings per week. That should get my income right where I want it to be."

ан алт түүл ан на жили на анализиясына жоло түүл түүкөө солот на окана киланина солинин жолоосун түүкөө жолоо

- Derek Van Dam, Atlantic, GA

JOIN OUR HOME MAILER TEAM TODAY!

.....

Earn Full-Time Pay from Home ...in just a few hours per week!

You'll earn 50% for each sale we receive from the postcards you mail, up to \$34.00 each. We pay all the conversion costs including: postage, printing, shipping, credit card processing and computerized bookkeeping. The amount of people who respond to these postcards is so high, we can hardly keep up with the demand. That's why we're happy to pay you half of every sale for helping. Sign up now to start earning creat money working from home!

FREE BONUS#1- A FREE copy of Success At Home, The Nationally published Work At Home Directory offering over 200 additional, legitimate ways to make money from home! All of them reviewed and rated for you!

THIS Home-Work Directory...\$32.00 Value, is yours for FREE..., No Strings Attached! We understand that times are getting tough and that you might consider working more than one work at home job to start making money even quicker. That's why we are offering the work at home directory. Success At

Work from Home Jobs MoneyForMailing.com, Work at Home Mailing Job, Weekly Paychecks

Page 4 of 4

Contact Us

Home. To you for FREE.

This directory informs you of over 200 work-at-home opportunities. They have all been reviewed and rated to expose you to only the very best money-making opportunities. This book has been a must have in the work at home industry for over 10 years! Success at Home sells for \$32 ... online as well as in multiple national bookstore chains! But for a limited time, it's yours Free, for simply enrolling with us at any level of our home postcard mailing program. That's right, Just for registering: you will receive a FREE copy of Success At Home with your first bundle of postcards and supplies... You have nothing to lose ... Start Today As a Home-Mailer!

FREE BONUS #2- MAKE MORE \$\$\$ EACH WEEK! USE THE INTERNET TO CASH IN - NO COMPUTER OR EXPERIENCE NEEDED. As a free gift with every postcard program you join, you will receive YOUR VERY OWN WEBSITE! Each professionally designed website gives you an additional way to make money at home - using the awesome power of the internet!

Make Unlimited Income with our Mailing Program Using Your New FREE Websites!

Each website is embedded with your unique company code number, ensuring proper payment to you each week. Just put your new web address on your postcards, and anywhere else people will see it, to generate a great weekly income. This is your opportunity for fast, automatic cash. You can make money 24 hrs a day, even while you sleep. You don't need a connection to the internet or any web experiences. In fact, you don't even need a computer We will manage everything for you, all for FREE! Take advantage of this limited offer and get your share of internet riches! Register Today. Your personal unique web addresses will be sent to you with your first set of supplies. <u>Enroll now!</u>

Here's the bottom line: Every time one of your postcards or brochures is returned to us, or we receive an order through your website, we'll out you a check for 50% of the sale. Your earning potential increases as you mail more postcards and brochures. So if you want more money every week, just send out more mail. We'll also show you how to increase your earnings by using our other proven methods of promotion. With our 100% NO questions asked guarantee you have nothing to lose. You wait to your self to consider the easy money you can make from your home.



We are so positive that you will be happy with your samings, we guarantee it! Our success depends on your complete satisfaction. If at any time you feel that this program is not for you, just return the unused materials within 45 days and we'll rush a refund back to you. With this 100% "No Cutestions Asked" Money-Back. Guarantee, you have absolutely nothing to keep Click here to <u>Enroll now.</u>

Don't Delay! Start working as a Home-Mailer Today!

Home | About Us. | Tep Ten Reasons to Work from Home. | Work at Home Q&A A Letter from The President | Free Bonus Offer | Testimonials. | Pay Scale | Sign Up

Sile Hosted By A. New Jersey Web Cestign Specialist - JBE Computers



GET PAID TO SHOP

Stores across the Nation are looking for independent "Secret Mystery Shoppers" to help monitor the quality of service received by their customers!



In today's business world, there's a high demand for quality customer service and safe, pleasant conditions in retail stores. That's why there's SUCH a big demand for Secret Mystery Shoppers.

Our company currently handles 1,000's of retail establishments and are looking for a limited number of interested person in each region of the country to become *Secret Mystery Shoppers*. If you are neat and responsible, you can get paid for shopping around your own town!

HOW DOES THIS WORK?

There are thousands of stores across America such as department stores, supermarkets, appliance stores and clothing stores. All of them need to know how well their customers are treated when the manager is not around. They do this by hiring *Secret Mystery Shoppers* to go on free shopping outings in their stores and report on various aspects of the shopping experience. To find out how friendly their salespeople are, how clean their store is and how fast you get waited on, store managers rely on *Secret Mystery Shoppers*! This is where you, and the Independent Shoppers Network, come in.

SOMETIMES YOU EVEN GET FREE MERCHANDISE!

In some cases they pay for it , , , and you keep it! Everything from furnishings to clothes, shoes, food, tools, appliances and more. The possibilities are endless. You won't ever have to buy anything with your own money! Local stores who want you as a *Secret Shopper* will supply you with everything you need. The businesses you will shop for will contact you for assignments directly, by calling you or sending you a letter in the mail.

If you are sincerely interested in getting paid to shop, act now! You'll be enrolled in the Independent Shoppers Network and immediately get started in this exciting profession. There is No experience is needed — We will provide you with everything you need to make this a potential part-time income for life. You may have seen other job offers through the mail that didn't deliver what they promised. Please rest assured, the Independent Shoppers Network has the best resources, the best industry contacts, and a dedicated staff that is working round-the-clock to ensure you receive up to date contacts for your success as a Secret Mystery Shopper.

IN SOME CASES YOU CAN MAKE \$25.00 AN HOUR OR MORE.

We have found that most Secret Mystery Shoppers earn \$20 to \$25 an hour depending on how fast they shop. Plus...

You will set your own schedule.

Exhibit C

Page 1 of 2

Case 1:10-cv-00568-NLH -KMW Document 1 Filed 02/02/10 Page 28 of 28

GET PAID TO SHOP

3 3

الرون م مريح المرجع

- You decide when to shop.
- You can take the time you want for your family and friends.
- You can even quit any time you want.

Don't pass up this great opportunity to become a well-paid Secret Mystery Shoppers.

back to MailFromHome.com